Emirates NBD Capital الإمارات دبي الوطني كابيتال

SANCTIONS & HIGH RISK QUESTIONNAIRE

Date of Completion	D	D	M	M	Y	Y	Y	Y

Customer ID	Customer Name

a. Please provide your current list of top 5 suppliers and clients:

Sr. No.	Name	Country	Supplier / Client
1			Supplier
2			Supplier
3			Supplier
4			Supplier
5			Supplier
1			Client
2			Client
3			Client
4			Client
5			Client

b. Do you trade in products or services that originate in any of the following sanctioned countries?

S.no	Country Names	Yes / No	% of Business, if yes
1	Cuba		
2	Burma/Myanmar		
3	Iran		
4	North Korea (DPKR)		
5	North Sudan		

6	South Sudan		
7	Syria		
8	Crimea (Ukraine)		

c. Do you import goods or services of any origin from or which transit through any of the following sanctioned countries?

S.no	Country Names	Yes / No	% of Business, if yes
1	Cuba		
2	Burma/Myanmar		
3	Iran		
4	North Korea (DPKR)		
5	North Sudan		
6	South Sudan		
7	Syria		
8	Crimea (Ukraine)		

d. Do you export or re-export any goods or services either directly or indirectly to any of the following sanctioned countries?

S.no	Country Names	Yes / No	% of Business, if yes
1	Cuba		
2	Burma/Myanmar		
3	Iran		
4	North Korea (DPKR)		
5	North Sudan		
6	South Sudan		
7	Syria		
8	Crimea (Ukraine)		

e. Do you export or re-export any goods or services which transit through any of the following sanctioned countries?

S.no	Country Names	Yes / No	% of Business, if yes
1	Cuba		
2	Burma/Myanmar		
3	Iran		
4	North Korea (DPKR)		
5	North Sudan		

6	South Sudan		
7	Syria		
8	Crimea (Ukraine)		

f.	**Do you remit/receive any money directly to/from any sanctioned country or indirectly via another country or directly or indirectly to/from a sanctioned person? If yes, please elaborate**.	**Yes / No**	**Comments:**

g.	**Do you perform Business/transactions on behalf of a third party?** **If yes, provide details.**	**Yes / No**	**Comments:**

h.	**Do you have any subsidiary, branch, office or other presence in a Sanctioned Country? If yes, specify the sanctioned country and nature of Business / Operations.**	**Yes / No**	**Comments:**

h.	**Do you have any subsidiary, branch, office or other presence in a sanctioned country? If yes, specify the sanctioned country and nature of business/ operations.**	**Yes / No**	**Comments:**

- **<u>If any of your responses to questions (b, c, d or e) is "YES"</u>**
  - **Then please provide your responses to the below.**
  - **If "No" then only provide response to Q6 & Sign and Return.**

1) What is the nature of your customers, suppliers, counterparties or other persons with whom you transact with in the sanctioned country? How many are there? Who is the end user (if different) of the goods sold, in the sanctioned country.

2. What are the goods/products? For supplies from a sanctioned country describe the product and list the destination(s) to which they are sent? For supplies to a sanctioned country, list country/ies of origin and confirm if any goods products originated in the U.S.

3. Do you transact with any SDN/Sanctioned parties or entity owned by an SDN/Sanctioned party in any of the sanctioned countries.

4. Do you hold any specific licenses (e.g. OFAC) to conduct these transactions? Will you allow us to sight those licenses held? Or are there specific exemptions under US and EU sanctions rules that permit the nature of your activity with the sanctioned country?

5. Which Bank(s) are used by you to transact with sanctioned countries? (please provide details for each country)

6. Are you planning to explore business opportunities within Iran or with Iranian companies, if sanctions are lifted as part of the Iran Nuclear Deal (JCPOA)? – If yes please provide details of the anticipated business activities in Iran or connected to Iran.

7	Total Sales of client (USDm)		% sales involving each sanctioned country, or with sanctioned person/entity.	
8	Total Purchases of client (USDm)		% purchases involving each sanctioned country, or with sanctioned person/entity.	
9	Total Assets of the client (USDm)		% Assets in each sanctioned country, owned by sanctioned person/entity.	
10	Total Operating income of client (USDm)		% of Total Operating income (estimated) involving sanctioned Country or sanctioned person/entity.	

The Account Holder/Client undertakes it will not transact any business through their ENBDC KSA accounts that are for the direct or indirect benefit of any person or entity located in a Sanctioned Country or with any country, state, entity, vessel or individual designated as a sanctioned entity.

The Account Holder/Client agrees not to utilize the services of a 3rd party ENBDC KSA client to effect foreign currency transactions on their behalf via the use of internal account to account transfers, and that all such internal transfers will be executed only for legitimate business purposes.

The Account Holder/Client agrees to provide, if and when requested, any additional information and to execute and deliver such documents regarding its self, its beneficial owners, and or its transactions (conducted through their ENBDC KSA account) that may reasonably be required by the ENBDC KSA. The Account Holder/Client further acknowledge that failure to provide such documentation, or to provide false, incorrect or misleading information may result in the ENBDC KSA requesting immediate closure and exiting of all accounts and client relationships.

The Account Holder/Client shall notify the ENBDC KSA immediately in writing if any representation, undertaking or confirmation contained herein, or any information provided, becomes, or is likely to become untrue or inaccurate in whole or in part at any time.

I/We confirm that this Questionnaire has been signed by_____(name of the person) who holds position of_____in the company and that all information is correct and true at the time of responding and is authorized to provide such certifications / undertakings.

Signature & Co. Seal:	
Name of the Person:	
Designation:	
Date:	