

SECTION I – GENERAL ADMINISTRATIVE INFORMATION

Registered name	ARQAAM CAPITAL LIMITED	
Trading name (if different)		
Registered address	Level 4, Building GV05 , The Gate Village Dubai International Financial Centre PO Box 506687, Dubai United Arab Emirates	
	Physical presence at this address?	Y
Trading address	Level 4, Building GV05 , The Gate Village Dubai International Financial Centre PO Box 506687, Dubai United Arab Emirates	
	Physical presence at this address?	Y
Banking License No. & Date Issued	F000407, 23 May 2007	
License type	Licence under Article 48 of Regulatory law 2004	
Commercial Registration No. and Expiry (if any)	CL0360	
Names of financial regulators	Dubai Financial Services Authority	
Web address	www.arqaamcapital.com	
Name and address of external auditor	Ernst & Young. PO Box 9267, 28 th Floor – Al Attar Business Tower, Sheikh Zayed Road, Dubai	
SWIFT BIC address		
Are your shares publicly traded? If 'yes', list exchanges and symbols	No	
Name of ultimate parent company (if applicable)	Arqaam Capital (Cayman) Limited	
Country of incorporation of parent company	Cayman Islands	

Anti-Money Laundering Due Diligence Questionnaire for counter parties

SECTION II – OWNERSHIP INFORMATION

Please list (or attach a listing of) all parties owning 5% or more of the issued capital of your institution:

Name	Ownership Interest (percentage)	Nature of ownership (direct/indirect)
Arqaam Capital (Cayman Islands) Ltd	100	100

SECTION III – POLICIES & PROCEDURES

		Yes	No
1	Does the country in which you are based have laws & regulations in relation to Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT)?	√	
2	Is your institution subject to such laws/regulations?	√	
3 a)	Do you have a written policy and operational procedures for prevention of money laundering and terrorist financing?	√	
3 b)	If not, are they planned to be introduced? Please indicate the estimated date of implementation:	n/a	
4	Are your policies & procedures compliant with local laws & regulations with regard to AML / CFT?	√	
5	Are your policies / procedures compliant with the Financial Action Task Force's (40 +9) recommendations?	√	
6	Would you provide us with a copy of your policies if we requested them?	√	
7	Are the AML/CFT policies and procedures applicable to your head office also applied to your foreign branches and majority owned subsidiaries (both local and overseas)? If 'no' please give / attach details of any units that are excluded:	n/a	
8	Does your policy require you to:	√	
	a) Verify the true identity of all customers prior to entering into a business relationship / undertaking any transactions?		
	b) Verify the true identity of underlying beneficial owners, if any?	√	
	c) Verify the source of wealth / funds and the level of economic activity of your customers?	√	
	d) 'Risk rate' your customer base based on criteria such as residence / volume and type of activity?	√	
	e) Apply enhanced customer due diligence on those customers identified as having a higher risk profile?	√	
	f) Periodically update due diligence information obtained?	√	
g) Review the AML/CFT controls of respondent banks before opening an account for them?	√		

SECTION III – POLICIES & PROCEDURES

		Yes	No
9	Do you retain copies of all relevant customer Identity Documents and transactions information? If 'yes' for what period?	√ - 1	
10	Do you have appropriate risk management systems to determine whether a customer is a Politically Exposed Person (PEP)?	√	
11	Do your policies and procedures permit you to open or maintain anonymous accounts?		√
12	Do your policies and procedures permit you to conduct business with Shell banks, i.e. banks which maintain no physical presence in the country of their incorporation (except if a subsidiary of a regulated financial group)?		√
13	Are any third parties (e.g., 'payable through' accounts) allowed direct access to the account (if any) maintained with us?		√
14	If 'yes' has their identity been verified as per your AML policies & procedures?	n/a	
15	Does your institution comply with FATF Special Recommendation VII and ensure that full originator information is included in all payments that you make?	√	
16	Does your institution have procedures for identifying payments / transactions related to persons / entities (appearing in relevant regulatory lists) suspected of terrorism? If 'yes' are these automated or manual?	√	
17	Do you have a system for detecting abnormal customer transactions or patterns of activity in relation to the expected norm? Is this manual or automated?	√ - 2	
18	Do you have policies and procedures for the identification and reporting of transactions that are required to be reported to the authorities?	√	
19	Are you permitted by your local regulations to share relevant customer identification data with your correspondents should this be requested?	√ - 3	
20	If 'yes', would you be willing to do so if required by us where a legitimate need has arisen?	√	
21	Does your institution have an established audit and / or compliance review function to test the adequacy of compliance with your AML / CFT policies and procedures?	√	
22	Does the Regulatory body / competent authority in your country conduct AML / CFT reviews of your institution. If 'yes' with what frequency?	√	
23	To the best of your knowledge are you in compliance in all material respects with all relevant AML / CFT laws and regulations?	√	

Anti-Money Laundering Due Diligence Questionnaire for counter parties

SECTION III – POLICIES & PROCEDURES

		Yes	No
24	Has your institution been subject to any investigation, indictment, conviction or civil enforcement related to money laundering and terrorism financing in the past five years? If 'yes' please attach details.		√
25	Does your institution have an established employee training program to teach employees about money laundering and to assist them in identifying suspicious transactions? If 'yes' with what frequency is training required?	√	

SECTION IV – CONTACT DETAILS

Has your institution appointed a Money Laundering Reporting Officer (MLRO)? If 'yes' please provide:

Name:	Robin Roy	Phone:	+971 (0) 4 507 1700
Address	Level 4, Building GV05 , The Gate Village Dubai International Financial Centre PO Box 506687, Dubai United Arab Emirates	Fax:	+971 (0) 4 507 1701
Title	MLRO	E-Mail	robin.roy@arqaamcapital.com