

Sanction compliance program:

Proceeding from the Bank's faith in its role within the local and the international economic system, the Bank is keen to comply with the UN Security Council Resolutions ratified by the Hashemite Kingdom of Jordan regarding the sanction lists related to counterterrorism and the banning of weapons of mass destruction. Furthermore, the Bank complies with any resolutions issued by international bodies ratified by the Hashemite Kingdom of Jordan and the countries where the Bank operates, as well as the sanctions and restrictions imposed by countries in which the Bank of Jordan has dealings with correspondent Banks in the jurisdictions where they operate, within the working limits of dealing with the correspondent Bank.

The Bank of Jordan established an independent function within the organizational chart of the Compliance Department to monitor the application of the Bank's compliance program with the international sanctions, following up and reflecting any international updates within the international sanctions' compliance program.

Bank of Jordan applies the international sanctions compliance program at the Bank Group level, including the following:

- Sanctions Compliance Group Policy that is approved by the bank's board of directors and circulated to all bank employees according to their job duties and at all managerial levels.
- The bank follows a zero-tolerance approach with any form of non-compliance with International sanction programs imposed by international committees

According to the aforementioned policy, the Bank of Jordan is committed to the following:

- ✓ The bank refuses to deal with any persons or entities listed in accordance with the decisions issued by the UN Security Council.
- ✓ Immediately freezing the assets of any government, agency, individual, or institution within the sanctions regulations issued by the decisions of the UN Security Council's sanctions committees and informing the Technical Committee for the Implementation of the Security Council Resolution.
- ✓ Any transactions to and from the prohibited countries, according to the sanctions programs imposed on these countries are prohibited
- ✓ Any transactions related to specific types of economic and commercial activities within a country subject to sanctions are prohibited within the limits binding on the bank in this regard.

- ✓ Complying with the sanctions issued by OFAC of the US Department of Treasury within the limits that are binding on the bank in this regard.
 - ✓ Complying with the sanctions issued by the European Union within the limits binding on the bank in this regard.
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- Employing automated systems that provide a database on a daily basis that includes all global lists of persons and entities prohibited to deal with.
 - Implementing automated systems that provide an up-to-date database that includes all international lists of individuals and entities listed on embargo lists .
 - Automated integrating between customer onboarding channels and the worlds' compliance lists to make sure none of the new clients are listed on the international embargo lists; this verification process includes any UBO (partner/authorized/agent/guardian).
 - Continuously verifying that no pre-existing clients have been listed after account opening, through implementing automated periodical screening processes according to the risk based approach(RBA).
 - The implemented automated system automatically gives alerts in case the names of any pre-existing or new customer, UBO`s or entities are matched with the names of any sanctioned entities or individuals to be further investigated by the compliance department.
 - Clear work procedures that clarify the actions to be taken in case of any clients become listed on embargo lists, including the escalating and reporting process following discovery.
 - Verifying the parties to any financial transaction before its execution.
 - Implementing the Online Safe-watch system, which is fully integrated with the SWIFT transaction system, and automatically scans all fields of SWIFT messages for the existence of any listed individuals or entities, which therefore insures that no financial transactions are made with sanctioned entities.
 - Circulars updated periodically across the bank of Jordan banking group containing the names of countries with high risks in accordance with Security Council resolutions and international sanctions programs for the purposes of taking enhanced due-diligence measures before carrying out any operation to which one of these countries is a party.
 - A continuous examination process to verify the compliance of all bank employees with the requirements of the International Sanctions Compliance Program within the compliance verification programs conducted by the Compliance Department on a regular basis.
 - Internal audit programs to independently verify the adequacy of the procedures taken by compliance department to meet the requirements of the Compliance program of international sanctions.

- Continuous training programs that include training courses and awareness brochures for employees of all managerial levels, including the bank's board of directors, and updating the programs on an ongoing basis.

It should be noted that all the activities of the Compliance Department are subject to continuous scrutiny and review by the Internal Audit Department as an independent department which reports directly to the compliance committee emanating from the board of directors.