



**AXA INSURANCE GULF  
ANTI-MONEY LAUNDERING POLICY AND PROCEDURES**

A handwritten signature in black ink, appearing to be 'Cedric Charpentier', written over a horizontal line.

**Cedric Charpentier  
Chief Executive Officer**  
**(Authorised to sign on behalf of the Audit Committee which approved the policy in their meeting held on 06 November 2017 and ratified by the Board Executive Committee in their meeting held on 15 November 2017)**

Policy owner: Ajay Kumar C, Head of Regional Compliance, on behalf of the Audit Committee  
Last revision: November 2017

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# AXA Gulf Anti Money Laundering Policy

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## **A. COMMITMENT**

*“AXA is a global leader in the provision of financial protection and wealth management. Operating in the financial services sectors of numerous countries throughout the world, AXA is conscious of the risks arising out of money-laundering and terrorist financing. These criminal activities threaten society, as well as the Company, its customers, shareholders and staff.*

*AXA is committed to fighting these threats by harnessing the strengths of the entire Group. In this fight AXA intends to be among the companies of reference. AXA exercises the utmost vigilance wherever its products and services are involved, whether they are distributed by AXA owned distribution channels or external distribution channels. This vigilance extends to third party products and services when AXA is acting as the distributor.*

*To carry out this policy, Group entities are required to meet the higher of the requirements in this Charter and the requirements of applicable local regulations.”*

*Source: AXA Anti-Money Laundering and Counter Terrorist Financing Charter, Group Standard, approved by the Management Board on July 19, 2010:*

## **B. LEGAL ENVIRONMENT**

Do not hesitate to refer to the links below to learn more about the law of the country where your branch operates:

<b>Bahrain</b>	Amiri decree No 4 of 2001 with respect to preventing and prohibition of the Laundering of Money ( <a href="http://www.track.unodc.org/LegalLibrary/LegalResources/Bahrain/Laws/Bahrain%20Anti-Money%20Laundering%20Law%202001.pdf">http://www.track.unodc.org/LegalLibrary/LegalResources/Bahrain/Laws/Bahrain%20Anti-Money%20Laundering%20Law%202001.pdf</a> ) Central Bank of Bahrain rulebook, Volume 3 “Insurance”, Financial Crime Module ( <a href="http://cbb.complinet.com/net_file_store/new_rulebooks/v/o/Vol_3_FC_Apr_2017.pdf">http://cbb.complinet.com/net_file_store/new_rulebooks/v/o/Vol_3_FC_Apr_2017.pdf</a> )
<b>Oman</b>	Royal Decree 30/2016 Issuing The Law of Money Laundering and Counter Terrorism Financing( <a href="http://www.fiu.gov.om/files/English/Anti-money%20Laundering%20&amp;%20Terrorism%20Financing/Oman%20AMLCFT%20law%20final-ENG%20revised%20on%208%2009%2016.pdf">http://www.fiu.gov.om/files/English/Anti-money%20Laundering%20&amp;%20Terrorism%20Financing/Oman%20AMLCFT%20law%20final-ENG%20revised%20on%208%2009%2016.pdf</a> ) AML Rules for insurance companies issued by the Capital Markets Authority CMA Implementing Instructions (No. E/62/2017) of AML/CFT law for insurance companies, insurance brokers and agents
<b>Qatar</b>	Anti-Money Laundering and Combating Terrorist Financing (General Insurance) Rules 2012 (AMLG) ( <a href="http://www.complinet.com/net_file_store/new_rulebooks/q/f/QFCRA_8999_VER4.pdf">http://www.complinet.com/net_file_store/new_rulebooks/q/f/QFCRA_8999_VER4.pdf</a> ) Anti-Money Laundering and Combating Terrorist Financing Law No. 4 of 2010 ( <a href="http://www.qfiu.gov.qa/files/AML_CFT_L4_EN_2010_APR_OT.pdf">http://www.qfiu.gov.qa/files/AML_CFT_L4_EN_2010_APR_OT.pdf</a> ) Law No. (3) Of 2004 (COMBATING TERRORISM) ( <a href="http://www.qfiu.gov.qa/files/3_2004.pdf">http://www.qfiu.gov.qa/files/3_2004.pdf</a> )
<b>UAE</b>	Insurance Authority Board Resolution (13) of 2015 – Directives on Procedures for Anti-Money Laundering and Combating Terrorism Financing through Insurance Activities ( <a href="http://www.ia.gov.ae/ar/Documents/%D8%BA%D8%B3%D9%84%20%D8%A7%D9%84%D8%A7%D9%85%D9%88%D8%A7%D9%84.pdf">http://www.ia.gov.ae/ar/Documents/%D8%BA%D8%B3%D9%84%20%D8%A7%D9%84%D8%A7%D9%85%D9%88%D8%A7%D9%84.pdf</a> ) Federal Law No (4) of 2002 regarding criminalization of money laundering ( <a href="http://www.centralbank.ae/en/pdf/amlsu/Federal-Law-No.4-2002-English.pdf">http://www.centralbank.ae/en/pdf/amlsu/Federal-Law-No.4-2002-English.pdf</a> ) Federal law No (8) of 2004 regarding Financial Free Zones ( <a href="http://www.centralbank.ae/en/pdf/amlsu/Federal-Law-No.8-2004-English.pdf">http://www.centralbank.ae/en/pdf/amlsu/Federal-Law-No.8-2004-English.pdf</a> ) Decree of Federal Law No. (1) of 2004, on Combating Terrorism Offences was issued on 28 July2004. ( <a href="http://www.centralbank.ae/en/pdf/amlsu/Decree-Federal-Law-No.1-2004.pdf">http://www.centralbank.ae/en/pdf/amlsu/Decree-Federal-Law-No.1-2004.pdf</a> )

## **C. WHAT IS MONEY LAUNDERING**

Money laundering is the process by which the true origin and ownership of proceeds of criminal / illegal activities are concealed and transforming these proceeds of criminal / illegal activities into legitimate capital.

### **C.1. Money Laundering offence**

Under the Bahrain AML Law (and in almost all other AML laws of other applicable jurisdictions), a money laundering offence includes:

- a. Conducting a transaction with the crime proceeds;
- b. Concealing the crime proceeds;
- c. Receiving/transferring the crime proceeds
- d. Retentions/possession of the crime proceeds.
- e. Tampering with the evidence on Money laundering.
- f. Knowing of any money laundering offence or providing any facility to any person committing the money laundering offence.

In addition, the above as per the provisions of the AML law following are also considered money laundering offences

- g. **Failure to disclose information;**
- h. **Failure to comply with official orders;**
- i. **Prejudicial disclosure of information;**

### **C.2. Stages of Money Laundering**

The Money Laundering process often involves the following three Stages:

#### **a. Placement**

Placement is the first stage by which funds derived from a criminal activity are introduced into the financial system, either directly or through using other retail businesses. This can be in the form of large sums of cash or a series of smaller sums..

#### **b. Layering**

The aim of the second stage is to disguise the transaction through a succession of complex financial transactions with the purpose of erasing as quickly as possible all links with its unlawful origin. The funds may be converted into shares, bonds, life insurance policies or any other easily negotiable asset or may be transferred to other accounts in other jurisdictions.

#### **c. Integration**

Complex integration schemes then place the laundered funds back into the economy through real estate, business assets, securities and equities, in such a way that they re-enter the financial system appearing as normal business funds that have been legitimately earned. It is the final stage in which the money launderer takes the illegal money back into the legitimate economy.

## **D. REPORTING OF SUSPICIOUS TRANSACTIONS & STAFF AWARENESS**

### **D.1. Suspicious transactions – typical cases**

AXA encourages all staff members to report suspicious transactions. All suspicious transaction cases as well as any attempted suspicious transaction should be reported directly to MLRO. Examples of money laundering could include:

Sales / underwriting:

- **any large payment by cash** (cash payments in excess of BHD1,000 / AED10,000 / OMR1,000 / QAR10,000 are considered material and may be reported to the MLRO for verification).
- **payment by way of third party** cheque or money transfer where there is a variation between the account holder, the signatory and the insured;
- **a proposer who is not resident** and where the purchase of an insurance policy in the GCC appears abnormal or suspicious, or any proposer with no discernible reason for purchasing insurance
- **any transaction in which the insured is unknown or is a front** covering several unconnected individuals;
- any transaction where **the customer has no clear insurable interest**;
- **a transaction not in keeping with normal practice** in the market to which they relate, e.g. with reference to size or class of business;
- **refusal to provide the information and identification documents**, could also constitute suspicious transaction and should be reported

Endorsements / cancellations:

- **assignment of policies to apparently unrelated third parties**;
- **early cancellation** of policies with return of premium, with no discernible purpose or in circumstances which appear unusual;

Claims:

- **abnormal settlement instructions**, including large cash payment, or payment to apparently unconnected parties, or to countries in which the insured is not known to operate.
- **large claims in the first year**, need special attention as this could indicate layering whereby laundered funds are given the legitimacy of insurance funds.

## **D.2. Suspicious transactions – actual examples**

The examples below are derived from actual cases reported by AXA France. Names and locations have been changed. The same could happen here in AXA Gulf!

### **CASE 1: UNDERWRITING**

*The manager of a car rental company contracts a policy for his small fleet through a broker. He pays the premiums in cash. In fact, according to the broker, the real owner of the company is a business representative from Central Europe and the cash used for the premium payments is originated from Egypt.*

Do we have to report a suspicious transaction?

**Solution: YES!**

- *The rental company is the legal client. However, the fact that it is owned by unidentified foreign interests and that the payment was made in cash make it suspicious. The rental company could be acting as a front to launder money.*
- *Even in the case where the broker might have reported this as a suspicious transaction to the regulator, the insurance company itself has to do the same. AXA could be fined for failing to report a suspicious transactions that the regulator or the judiciary has come to know through different ways (this happened in Europe!).*

### **CASE 2: UNDERWRITING & CLAIMS**

*Mr X, profession teacher, subscribes through a broker in Saudi Arabia a car insurance contract for two second-hand large-engine-capacity cars, that he has bought for a total value of USD 150,000 in cash from a private individual residing in Qatar.*

*The policyholder brings some cash and a check provided by his brother from a bank account of a free-zone company. Nothing about this company can be found on the web and on the web-site of the free zone.*

*The client declares the cars stolen during a burglary after 6 months and makes a claim.*

Do we have to report a suspicious transaction?

Solution: YES!

- The **sum insured is not in keeping with the client's declared profession.**
- The **source of the payment cannot be traced.**
- If not detected at the underwriting stage, it should be reported when making a claim. It could be a **case of claim fraud / fake burglary.** The police report provided does not prove anything, as the police have to provide a report for all theft declared to them – whether they can be verified or not.

**CASE 3: PREMIUM REFUND**

AXA underwrites through a broker a heavy lorry fleet policy and group life and savings policy for a small trading company.

The contract includes provisional (in advance) premium payments and a reviewed premium based on the company's annual statements (turnover, salaries, number of insured employees, ..).

The broker and the insured company agree on overestimating the provisional premium, to be safe.

The annual revision of the policy resulted in partial refund of the premium. The company ask the refund to be partly paid on the account of the Chairman, partly credited to his life and savings policy.

Do we have to report a suspicious transaction?

Solution: YES!

- **Large or recurring premium refunds** are usually suspicious because they are an easy way to launder money.
- The broker's agreement to do the operation is not a guarantee. The broker might simply want to complete the transaction to receive the commission. In the actual case in France, the broker was sharing the premium refund with the client!
- Here there is also a case of misappropriation of company's assets. We should **be careful to pay to the client company's bank account, not to an employee** or another unrelated company. This case should probably be reported to the police, not only to the insurance regulator.

**CASE 4: CLAIMS**

An expatriate businessman buys an industrial butcher business paid by funds from an unknown origin and underwrites an industrial multi-risk policy through a broker.

Two months following the underwriting, fire destroys the building. The insurance company pays an immediate compensation to the enterprise, as agreed in the contract. The deferred compensation meant to be paid based on actual invoices was never paid, as the business has never been reconstructed, but put in bankruptcy 6 months later due to cash flow issues.

Do we have to report a suspicious transaction?

Solution: YES!

- **We do not know where the claims payment went!** We do not know much about the actual purchase of this business (Price? Source of funds?). In the actual case, the immediate compensation paid proved to be higher than the actual purchase price!
- **We have no knowledge of the client's revenues and of his actual professional activity** (businessman is a generic term).

**D.3. Branch Money Laundering Reporting Officers**

In case of any doubt on the nature of a transaction, the staff should contact their local Branch MLRO (or the Regional Money Laundering Reporting Officer, see below). The Branch MLRO will provide advice and will help to liaise with the regional MLRO.

Branch	Branch MLRO
Bahrain	<b>Mariam Ismail Baqer</b> (email to <a href="mailto:compliance.bahrain@axa-gulf.com">compliance.bahrain@axa-gulf.com</a> )
Oman	<b>Mohamed Shabir</b> (email to <a href="mailto:compliance.oman@axa-gulf.com">compliance.oman@axa-gulf.com</a> )
Qatar	<b>Ritesh Bharadava</b> (email to <a href="mailto:compliance.qatar@axa-gulf.com">compliance.qatar@axa-gulf.com</a> )
UAE	<b>Essa Al Mulla</b> (email to <a href="mailto:compliance.uae@axa-gulf.com">compliance.uae@axa-gulf.com</a> )
Regional Office	<b>Ajith Ramachandran</b> (email to <a href="mailto:compliance@axa-gulf.com">compliance@axa-gulf.com</a> )

#### **D.4. Alerting the Money Laundering Reporting Officer**

All staff should report any suspicious, fraudulent or abnormal transaction to AXA Gulf's Money Laundering Reporting Officer (MLRO):

AXA Gulf Regional MLRO	<b>Ajay Kumar C</b> , <a href="mailto:ajay.kumar@axa-gulf.com">ajay.kumar@axa-gulf.com</a> Tel: (+973) 17202208
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The MLRO will analyze reported suspicious transactions and decide whether to report it to the regulators. The MLRO will keep the name of the staff member who reported the suspicious transaction confidential unless with his/her prior approval.

If for any reason the MLRO cannot be reached or does not acknowledge receipt, the staff should escalate to the Global Anti-Money Laundering Officer listed below:

AXA Global AMLO	<b>Robert Walsh</b> , <a href="mailto:Robert.Walsh@axa-equitable.com">Robert.Walsh@axa-equitable.com</a> Tel. (+1) 2123145381
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Any format for reporting is suitable (plain email, phone call...). **Failure to report a suspicious transaction without reasonable excuse would be considered as a professional mistake.** In case of any doubt, the MLRO should be contacted to obtain clarification.

#### **D.5. Staff awareness**

This policy is available to all employees. New employees will be given a paper copy when signing their contract and the importance of AML to AXA will be explained. It will be circulated to all staff and also uploaded on the company's website (<http://www.axa-gulf.com/> and click on "About AXA" tab and then "Compliance" tab) and posted on the ONE intranet.

AXA will provide training to staff in exposed functions or business lines. Staff can enrol for AML E-training on the AXA iLearn portal (for assistance contact your MLRO or the Learning & Development team - [Hrl&d@axa-gulf.com](mailto:Hrl&d@axa-gulf.com))

### **E. "KNOW-YOUR-CUSTOMER" PROCEDURES**

#### **E.1. Materiality**

AXA Gulf will exercise simplified due diligence when total transactions over 12 months for the same client remain below BHD 6,000 / AED 60,000 / OMR 6,000 / QAR 60,000 / USD 15,000.

AXA Gulf's policy for these less material clients is to rely on the usual checks performed by Underwriting and Claims departments (several of them built in the IT system), the Finance department and Internal Audit.

#### **E.2. Verifying the identity of the large clients**

The identity of large clients (above materiality threshold) should be systematically verified.

Verifying the identity consists in either:

- seeing an original valid Commercial Registration (or ID for individuals) and filing a copy marked "original sighted" by AXA staff,
- obtaining and filing a certified copy of a valid Commercial Registration (or ID for individuals). Faxes and electronic copies acceptable.

By law, the following persons can certify a document: a chartered accountant, or a lawyer, or an official from a ministry/embassy/consulate, providing he/she clearly identify him/herself in the certification (title, business card ...). In most company, the CFO would be suitable.

Cases where the client name differs from the Commercial Registration must be corrected. Reluctance from the broker or client to provide proof of identity should be reported to the local MLRO, for possible reporting to the regulator as a suspicious transaction. If need be, brokers should be reminded of their AML responsibility under the law.

### **E.3. Obtaining complete client details for all clients**

The data below should be collected upon sales or policy renewals. **Under no circumstances should AXA Gulf maintain anonymous or fictitious accounts.** .

<u>Natural persons</u>	<u>Legal entities</u>
<ul style="list-style-type: none"> <li>a) full legal name</li> <li>b) nationality</li> <li>c) date and place of birth</li> <li>d) passport number or CPR or Iqama number</li> <li>e) full permanent residential address or employer physical address otherwise</li> <li>f) Contact detail (tel., email)</li> <li>g) Occupation</li> <li>h) Employer's name</li> <li>i) Source of funds</li> <li>j) Anticipated premium volume</li> <li>k) Signature</li> <li>l) a certification by the client that he is acting on his own behalf.</li> </ul>	<ul style="list-style-type: none"> <li>a) full legal name</li> <li>b) legal form</li> <li>c) date and place of incorporation</li> <li>d) registration number</li> <li>e) registered address and trading address where applicable</li> <li>f) Contact detail (tel., email)</li> <li>g) type of business activity</li> <li>h) Source of funds</li> <li>i) Anticipated premium volume</li> <li>j) Name of the auditor</li> <li>k) a certification by the signatory that he is duly authorized by the company</li> <li>l) Details of shareholders (holding or controlling more than 10% of shares)</li> <li>m) Details of Directors</li> </ul>

### **E.3. Enhanced customer due diligence for Politically-Exposed Persons (PEP)**

**PEPs include heads of States, senior members of the government, the judiciary, the military, or state-owned companies. PEPs also include Members of Parliaments and senior members of political parties.**

AXA Gulf relies on World-check listing and data from customers to identify PEPs.

Maintaining a business relationship with a PEP or PEP family member implies enhanced due diligence measures that should be summarized in a report signed by the Country Manager, copied to the MLRO and filed in the customer file:

- **establishing the source of wealth / source of funds,**
- **stating the expected customer activity (what policies, for what amounts),**
- **detailing the existence of any foundation, trust, company or any complex financial structure used in dealing with AXA Gulf.**

Note that this report can be researched without necessarily questioning the client (PEP are not always accessible!).

Each branch is required to maintain a list of PEP clients using the VIP form (and subject to the same materiality threshold as stated above). VIPs includes (i.) PEPs, (ii.) large individual credit customers, (iii.) any other person that the branch would believe to be exposed to money-laundering schemes, blackmail ... or would want to bring to the MLRO's attention.

The senior management (country managers) should record his approval for taking on a client who is a PEP after due consideration of the potential risk for AXA.

The MLRO will maintain the same list at regional level for continuous monitoring.



#### **E.4. Enhanced customer due diligence for Non Cooperative Countries**

The same measures as for PEPs should be applied to any resident of a Non Cooperative Country as defined by the Financial Action Task Force (inter-governmental body of which the GCC is a member).

As of October, 2017 there are no countries on the NCCT list.

As of October 2017, the FATF identified jurisdictions that have strategic deficiencies and works with them to address those deficiencies that pose a risk to the international financial system (for latest list visit)

<http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/documents/fatf-compliance-june-2017.html>

Jurisdiction subject to a FATF call on its members and other jurisdictions to apply counter-measures to protect the international financial system from the on-going and substantial money laundering and terrorist financing (ML/FT) risks
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Democratic People's Republic of Korea (DPRK)
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Jurisdiction subject to a FATF call on its members and other jurisdictions to apply enhanced due diligence measures proportionate to the risks arising from the jurisdiction
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Iran
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FATF identifies the following jurisdictions with strategic AML/CFT deficiencies for which they have developed an action plan with FATF..
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Bosnia and Herzegovina Ethiopia Iraq Syria Uganda Vanuatu Yemen
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#### **E.5. Tracking corporate or individuals linked to terrorist organizations**

AXA Gulf should screen its clients database for persons subject to sanctions especially those connected to terrorist organisations, as identified by the United Nations and regularly updated under <http://www.un.org/en/sc/documents/resolutions/>

Branch MLRO's have access to World-check login which can be used to review new clients against the sanctioned lists.

AXA Gulf branch MLRO also have access to Watch list Management (WLM) system which is used for screening of customers on a monthly basis. Branch MLROs must investigate the alerts generated and notify Regional MLRO in case of any positive matches.

#### **E.6. Know-Your-Intermediary**

As per the law, the brokers have the same responsibility as the insurance companies. They must notably obtain sufficient client details, establish the source of their funds, and report suspicious transactions.

It is the responsibility of the staff dealing with brokers and agents to ensure that they are licensed by the insurance regulators and documents evidencing this must be obtained and maintained. The documents required for corporate intermediary due diligence are same as for the corporate customer due diligence

**The brokerage agreement should clearly state the intermediary's responsibility to implement AML procedures.** AXA may rely on the intermediary's customer due diligence

(KYC) process, however, the ultimate responsibility for customer due diligence remain with AXA Insurance Gulf

### **E.7. Know-Your-Agents and Counter Parties**

It is the responsibility of the insurance company to ensure that agents or authorised representatives are properly informed about the AML regulation, policies & procedures. AXA Gulf should conduct the KYC of the customer sourced through agents or authorised representatives.

Background check of counterparties to be done especially if the domicile of the counterparty is in a sanctioned country. The screening is done to ascertain whether the counter party is or has been involved in any financial crime. Finance team should refer to Regional Office Compliance team before effecting any payment to counterparties located in sanctioned countries

## **F. ACCOUNTABILITY & REPORTING**

### **F.1. Accountability**

Every year, the Audit Committee, approves the company's updated AML policy and reviews the AML report. Significant matters will be reported by the Audit Committee to the Board.

The MLRO is responsible for

- collecting STR and informing the relevant regulators whenever appropriate,
- drafting and updating the company's AML policy,
- monitoring the progress in implementing the relevant procedures across the Operations and informing the Management and the Audit Committee,
- maintaining archives of all STR, annual reports, training programs for a period of 5 years minimum.

### **F.2. Reporting**

The MLRO is responsible for the production of the company's Annual AML report.

AXA Group prescribes a model template providing guidance of the areas the report should cover. This is sent to the MLRO by the Global AML officer every year. The key areas as provided in the template are:

1. Local Regulations – Current regulations and changes during the period
2. Organization and Scope – Entities covered and AML organisation in the entity
3. AML/CTF Program - key elements of the AML/CTF Program of the entity
4. AML/CTF Reviews – Audits and Regulatory examinations
5. AXA Group - Describe ways AXA Group can help the entity.

### **F.3. Record Retention**

The branches must comply with record keeping requirements as specified in the respective countries regulation. This may vary from country to country.

In **Bahrain**, customer records, training records and compliance records must be maintained for a period of **five years** after the transaction is completed while transaction records must be maintained for a period of **ten years**.

In **Qatar**, all records must be maintained for a period of **six years**.

In **Oman**, all records must be maintained for a period of **ten years**.

In **UAE**, all records must be maintained for a period of **ten years**.

## **G. AML Audit and AML Training**

As per AXA Group AML Advisory 2016, AML Audit and AML Trainings must be conducted at least every two years.

## **H. AML Questionnaires**

AML Questionnaires received from banks and other third parties must be forwarded to Group Compliance for review prior to submission to banks or other third parties.

## **I. PENALTIES FOR NON-COMPLIANCE**

The company faces a huge reputational risk if it is deemed to be involved in Money Laundering related prosecution or faces regulatory censure for non-compliance with Anti-Money Laundering regulations of the respective countries. As a global brand, AXA is at risk not only locally but also internationally.

The AML regulations in all the countries impose criminal liability on the firms/individuals deemed to be involved in Money laundering and this includes fines, cancellation of licence and imprisonment. **Employees need to be aware that they can be individually prosecuted for involvement in Money Laundering offence.** As explained in section C.1 **failure to disclose information and tipping off customers under suspicion are deemed to be money laundering offence.**

**The company will also initiate disciplinary action against employees who are not in compliance with this policy.** The report will be made to the audit committee which will decide on disciplinary action to be taken.

**CONSULT YOUR MLRO IN CASE OF ANY DOUBTS WHETHER A  
TRANSACTION CONSTITUTES A SUSPICIOUS TRANSACTION**

**J. Form for reporting Internal Suspicious Transactions**

**AXA INURANCE (GULF) BSC (c)**



Branch: \_\_\_\_\_

In Respect of:  Individual  Company / Business

Date of transaction/attempted transaction:

1. Full Name of Client	
2. Nationality	
3. CR No. / ID No. / Passport No.	
4. Full Permanent address	
5. Date of Birth / Date of Incorporation	
6. Occupation / Business activity	
7. Contact Person & Designation (for companies)	
8. Telephone number;	
9. Fax number;	
10. E-mail address	
11. Website (if available)	
12. Source of Income	

Documents Collected	
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**Transaction Details**

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**Reason for Suspicion/Reporting** (attach additional sheets if required and note number of pages attached)

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**Name and Signature of Employee reporting**

**Date**

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**Comments by Branch MLRO and signature**

**Date**

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