MENA FCCG

Making a Collective Impact

Webinar: OECD Common Reporting Standard

Tuesday 24th January 2017





Welcome to the webinar

- The audio for this webcast can be delivered through your PC speakers or telephone.
- You have been muted upon entry. Please submit any questions in the Q&A window. If viewing in full screen mode, please click the 2 icon in the floating participant panel tray. We will address as many questions as time permits at the end of the presentation.
- Today's webcast will be recorded. The recording and presentation deck will be made available to you within the next couple of days.





Presenters Bios:

Mr. Pierre Arman – TRTA Market Development Lead, Thomson Reuters

Pierre Arman is the Market Development Lead for Tax and Accounting at Thomson Reuters, and is responsible for the strategy and product management of all Tax & Accounting and Global Trade Management solutions in the MENA region.

An experienced consultant in the tax technology consulting field, Pierre held different roles from pre-sales engineer to implementation manager throughout his career with Thomson Reuters.

Before being based out of Dubai, Pierre spent 5 years in London, including a secondment in Australia.

Prior to joining Thomson Reuters, Pierre's worked for an Actuarial Consulting firm where he focused on optimizing the tax position of HNWI and UHNWI's pension arrangements between Monaco and London.

Mr. Chahdan E. Jebeyli – Group Chief Legal & Compliance Officer, Bank Audi

He is a General Manager, member of the Group Executive Committee, Chairman of the Compliance Officers Committee of the Association of Banks in Lebanon and President of Compliance Officers Committee at the World Union of Arab Bankers.

Prior to joining Bank Audi in 1997, he was the Managing Director for Legal & Compliance at Citibank - Middle East & North Africa. Before Citibank, was in private legal practice in the USA with focus on commercial and banking matters.

He is a former Lebanese Judge and a member of the N.Y. and American Bar associations. He has an LLM in International Banking from Boston University, School of Law.

Ms. Carine Medlej – Manager, Group Compliance, Bank Audi

Ms. Carine Medlej has 16 years of experience in the banking industry with 10 years of experience in the Compliance area (AML & Regulatory). She worked for BNP Paribas for 6 years and is currently a Manager at Group Legal & Compliance – Bank Audi.

She overseas compliance in the private banking business line of Group Audi along with several projects including FATCA/CRS, Anti Bribery and Corruption, Compliance in Capital Markets.

Ms. Medlej holds a Master's degree in Economics and is a Certified Anti-Money Laundering Specialist (CAMS).

Ahmad Al Qawasmeh – VP & Head of Communication and Standards and FATCA Task Force, Arab Bank

Mr. Al Qawasmeh has 13 years of experience in the regulatory compliance field with five years of experience in the legal arena. He is currently working at Arab Bank - Group Regulatory Compliance as the Head of Communications and Regulatory Standards. As one of the experienced FATCA specialists in Jordan, Mr. Al Qawasmeh has been managing the FATCA/CRS Program at Arab Bank for over four years. The Program covers FATCA and the OECD Common Reporting Standard regulations across Arab Bank branches and subsidiaries in different jurisdictions. Mr. Al Qawasmeh holds Masters degree (LLM) in International Commercial Law and is a Certified Anti-Money Laundering Specialist (CAMS) and Certified FATCA Specialist.







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Common Reporting Standard Overview

- Developed by the OECD and the G20 countries to provide a single global standard for the exchange of financial account information
- Imposes account due diligence and reporting requirements on financial institutions in committed jurisdictions
- Exchange of data is facilitated through "Competent Authority Agreements" (CCA) between jurisdictions. The CCA is based on FATCA Model 1 Intergovernmental Agreement (IGA)
- As of July, 2016, 101 jurisdictions have signed the Competent Authority Agreement
 - Onboarding requirements for jurisdictions that are "early adopters" started on January 1, 2016, reporting requirements commence on March 31, 2017





Committed Jurisdictions

JURISDICTIONS UNDERTAKING FIRST EXCHANGES BY 2017 (54)

Anguilla, Argentina, Barbados, Belgium, Bermuda, British Virgin Islands, Bulgaria, Cayman Islands, Colombia, Croatia, Curaçao, Cyprus, Czech Republic, Denmark, Estonia, Faroe Islands, Finland, France, Germany, Gibraltar, Greece, Greenland, Guernsey, Hungary, Iceland, India, Ireland, Isle of Man, Italy, Jersey, Korea, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Mexico, Montserrat, Netherlands, Niue, Norway, Poland, Portugal, Romania, San Marino, Seychelles, Slovak Republic, Slovenia, South Africa, Spain, Sweden, Trinidad and Tobago, Turks and Caicos Islands, UK

JURISDICTIONS UNDERTAKING FIRST EXCHANGES BY 2018 (47)

Albania, Andorra, Antigua and Barbuda, Aruba, Australia, Austria, The Bahamas, Bahrain, Belize, Brazil, Brunei Darussalam, Canada, Chile, China, Cook Islands, Costa Rica, Dominica, Ghana, Grenada, Hong Kong (China), Indonesia, Israel, Japan, Kuwait, Lebanon, Marshall Islands, Macao (China), Malaysia, Mauritius, Monaco, Nauru, New Zealand, Panama, Qatar, Russia, Saint Kitts and Nevis, Samoa, Saint Lucia, Saint Vincent and the Grenadines, Saudi Arabia, Singapore, Sint Maarten, Switzerland, Turkey, UAE, Uruguay, Vanuatu

Committed jurisdictions must ensure effective implementation including the introduction of provisions that:

- Prevent circumvention of the CRS (anti-abuse provisions)
- Require reporting financial institutions to keep records of the steps undertaken to comply with the CRS (record-keeping requirements)
- Permit the effective enforcement of the obligations in the CRS (including penalties for non-compliance)





Key dates and requirements



*Will vary across jurisdictions





FATCA vs. CRS

	FATCA	CRS	
Governance	 Penalties determined by IRS Responsible Officer certifications FIs can choose various approaches to compliance (Lead / Single FI, etc) 	 Local law financial penalties for non-compliance No notion of Responsible Officer FIs will be required to comply in their own right 	 Local authorities are required to adopt an enforcement regime to ensure effective implementation Jurisdictions are subject to peer review by Global Forum
Due Diligence	-Indicia focused on US citizenship	 Indicia focused on tax residency Due diligence modelled off a Model 1 IGA with a number of key differences / Documentation relies on customer self certifications 	Expanded scope (i.e. US persons vs. over 100 countries' tax residents) FIs must asses self-certifications reasonableness based on KYC data and/or "public data search" for entities
Withholding	Required on Recalcitrant / Non-Participating FFI (NPFFI) accounts	No withholding applies No notion of "NPFFI"	Local financial penalties apply for non-compliant FIs
Reporting	Reporting to IRS	 Reporting to local authority - Required on account balances, income and sale proceeds from day one Requirement to notify account holder 	Requires multiple reporting for individuals and entities falling under more than one tax jurisdiction





CRS Compliance Roadmap

I. Establish Program Governance	II. Assess Overall Impact	III. Plan Compliance Efforts	IV. Determine Strategic FATCA & CRS reporting platform
 Identify Steering Committee Establish change management protocols and build stakeholder awareness Build internal communications strategy including Board involvement 	 Map early adopter countries to group footprint Understand requirements, local privacy laws and agreements between jurisdictions Determine impact to LoBs Perform comparison to FATCA, identify synergies 	 Establish work- streams Prioritize activities and secure resources (phasing of CRS implementation) Define milestones and build work plans 	 Identify reporting solution strategy and approach Develop customer communication strategy (individual reports or general terms and conditions)





CRS Compliance Roadmap

Nine Key Work streams:







II III Individuals

Higher Value

Residence address test* based on documentary evidence, or perform Electronic record search of Indicia

- · Electronic record search for indicia
- Paper record search if electronic records are incomplete
- Relationship manager inquiry actual knowledge – "annual process"

*Government issued documents that do not contain a specific address can be used as documentary evidence if the residence address on file is in the same jurisdiction as the government that issued the document.

Indicia:

- 1. Identification of the account holder as a resident of a reportable jurisdiction;
- 2. Current mailing or residence address (including a post office box) in a reportable jurisdiction;
- 3. One or more telephone numbers in a reportable jurisdiction and no telephone number in the jurisdiction of the reporting institution;
- 4. Standing instructions (other than with respect to a depository account) to transfer funds to an account maintained in a reportable jurisdiction;
- 5. Currently effective power of attorney or signatory authority granted to a person with an address in a reportable jurisdiction
- 6. A "hold mail" instruction or "in-care-of" address in a reportable jurisdiction if the reporting financial institution does not have any other address on file for the account holder







*Must obtain Documentary Evidence or a self-certification from the account holder. if this procedure does not successfully establish the account holder's residence for tax purposes then the reporting financial institution must report the account as an undocumented account.





I II III Entity

- Self-Certification of account holders (entity status (i.e. FI/NFE) and tax residence
- Establish Reasonableness of self certification based on KYC information and / or publicly available information
- If account is Passive NFE and below USD1 million use KYC
 information to establish tax residence of Controlling Persons
- If account is above USD1 million obtain Self-Certification from Controlling Persons
- If no Self-Certification obtained, an indicia search must be established











Controlling Persons for Preexisting Entity Accounts







Due Diligence – New Account



- Obtain a self-certification on tax residence
- Confirm the reasonableness of the self-certification based on information obtained as part of accounts opening, AML/KYC procedures





Due Diligence – New Account







Individual tax residency self-certification form – TEMPLATE

Individual tax residency self-certification FORM -(please complete parts 1-3 in BLOCK CAPITALS)

	Number or equivalent number* ("TIN") (See App	endix)	
Part 1 – Identification of Individual Account Holder	transet of equivalent number (this flore tipp		
A. Name of Account Holder:	Please complete the following table indicating (i) where the	Account Holder is tax resident and (ii) the Account H	tolder's
Family Name or Surname(s): *	TIN for each country/jurisdiction indicated. Countries/Jurisd		
Title:	certification include a tax identifying number for each coun	try/jurisdiction of residence (rather than for each Repo	ortable
First or Given Name: *	Jurisdiction).		
Middle Name(s):	If the Account Holder is tax resident in more than three cour	tries/jurisdictions, please use a separate sheet	
B. Current Residence Address: Line 1 (e.g. House/Apt/Suite Name, Number, Street, if any)*	If a TIN is unavailable please provide the appropriate reason		
Line 2 (e.g. Town/City/Province/County/State)*	Reason A - The country/jurisdiction where the Account Hole Reason B - The Account Holder is otherwise unable to obtai		
Country:*	unable to obtain a TIN in the below table if you have selecte	d this reason)	
Postal Code/ZIP Code (if any):*	Reason C - No TIN is required. (Note. Only select this reason the collection of the TIN issued by such jurisdiction)	f the domestic law of the relevant jurisalction does not i	require
C. Mailing Address: (please only complete if different to the address shown in Section B)			
Line 1 (e.g. House/Apt/Suite Name, Number, Street)			
Line 2 (e.g. Town/City/Province/County/State)	Country/Jurisdiction of tax residence	TIN If no TIN avail: enter Reason A,	
Country:			
Postal Code/ZIP Code:	1		
	2		
D. Date of Birth* (dd/mm/yyyy)	3		
E. Place of Birth	Please explain in the following boxes why you are unable to	obtain a TIN if you selected Reason B above.	
Town or City of Birth *	1		
Country of Birth*	2		





Part 2 - Country/Jurisdiction of Residence for Tax Purposes and related Taxpayer Identification

Individual tax residency self-certification form – TEMPLATE

Part 3 – Declarations and Signature*

I understand that the information supplied by me is covered by the full provisions of the terms and conditions governing the Account Holder's relationship with [the Financial Institution/insert FI's name] setting out how [that Financial Institution /insert FI's name] may use and share the information supplied by me.

I acknowledge that the information contained in this form and information regarding the Account Holder and any Reportable Account(s) may be provided to the tax authorities of the country/jurisdiction in which this account(s) is/are maintained and exchanged with tax authorities of another country/jurisdiction or countries/jurisdictions in which the Account Holder may be tax resident pursuant to intergovernmental agreements to exchange financial account information.

I certify that I am the Account Holder (or am authorised to sign for the Account Holder) of all the account(s) to which this form relates.

I declare that all statements made in this declaration are, to the best of my knowledge and belief, correct and complete. I undertake to advise [the Financial Institution/insert FI's name] within [XX] days of any change in circumstances which affects the tax residency status of the individual identified in Part 1 of this form or causes the information contained herein to become incorrect or incomplete, and to provide [the Financial Institution that maintains the account/FI's name] with a suitably updated self-certification and Declaration within [up to XX] days of such change in circumstances.

Signature: *	
Print name: *	
Date:*	

Note: If you are not the Account Holder please indicate the capacity in which you are signing the form. If signing under a power of attorney please also attach a certified copy of the power of attorney.

Capacity: *





Due Diligence – New Account



For certain Entity Account Holders (Passive NFES), the Reporting Financial Institution must establish whether the Entity is controlled by a Reportable Person(s).





Due Diligence – New Account







Entity tax residency self-certification form – TEMPLATE

Part 1 –Identification of Account Holder	(c) Active NFE – a corporation the stock of which is regularly traded on an established securities market or a	п
A Lond Name of Table (Second B	corporation which is a related entity of such a corporation	-
A. Legal Name of Entity/Branch*	If you have ticked (c), please provide the name of the established securities market on which the corporation is regularly	
B. Country of incorporation or organisation	traded:	
C. Current Residence Address	If you are a Related Entity of a regularly traded corporation, please provide the name of the regularly traded corporation that the Entity in (c) is a Related Entity of:	
Line 1 (e.g. House/Apt/Suite Name, Number, Street, if	and the childy in [c) is a newted childy of	-
any)*	(d) Active NFE – a Government Entity or Central Bank	
Line 2 (e.g. Town/City/Province/County/State)*	(e) Active NFE – an International Organisation	
Country *		
	(f) Active NFE – other than (c)-(e) (for example a start-up NFE or a non-profit NFE)	
Postal Code/ZIP Code (if any)*	(g) Passive NFE (Note: if ticking this box please also complete Part 2(2) below)	
D. Mailing Address (please only complete if different to the address shown in Section C above)	If you have ticked 1(a)(i) or 1(g) above, then please:	
Line 1 (e.g. House/Apt/Suite Name, Number, Street)		
Line 2 (e.g. Town/City/Province/County/State)	 Indicate the name of any Controlling Person(s) of the Account Holder:* 	
Country		-
Postal Code/ZIP Code		-
Part 2 – Entity Type Please provide the Account Holder's Status by ticking one of the following boxes.		_
1. (a) Financial Institution – Investment Entity	b. Complete "Controlling Person tax residency self-certification form" for each Controlling Person.*	
 An Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution (Note: if ticking this box please also complete Part 2(2) below) 	Please see the definition of Controlling Person in Appendix	
ii. Other Investment Entity		
(b) Financial Institution – Depository Institution, Custodial Institution or Specified Insurance Company		
If you have ticked (a) or (b) above, please provide, if held, the Account Holder's Global Intermediary Identification Num ("GIIN") obtained for FATCA purposes.	ber	



the answer company**
THOMSON REUTERS*



Entity tax residency self-certification form – TEMPLATE

Part 3 – Country/Jurisdiction of Residence for Tax Purposes and related Taxpayer Identification Number or functional equivalent* ("TIN") (see Appendix)

Please complete the following table indicating (i) where the Account Holder is tax resident and (ii) the Account Holder's TIN for each country/Reportable Jurisdiction indicated. Countries/Jurisdictions adopting the wider approach may require that the self-certification include a tax identifying number for each jurisdiction of residence (rather than for each Reportable Jurisdiction).

If the Account Holder is not tax resident in any country/jurisdiction (e.g., because it is fiscally transparent), please indicate that on line 1 and provide its place of effective management or jurisdiction in which its principal office is located.

If the Account Holder is tax resident in more than three countries/jurisdictions, please use a separate sheet

If a TIN is unavailable please provide the appropriate reason A, B or C where appropriate:

Reason A - The country/jurisdiction where the Account Holder is resident does not issue TINs to its residents Reason B – The Account Holder is otherwise unable to obtain a TIN or equivalent number (Please explain why you are unable to obtain a TIN in the below table if you have selected this reason)

Reason C – No TIN is required. (Note. Only select this reason if the domestic law of the relevant jurisdiction does not require the collection of the TIN issued by such jurisdiction)

Country/Jurisdiction of tax residence		TIN	If no TIN available enter Reason A,B or C
1			
2			
3			

Please explain in the following boxes why you are unable to obtain a TIN if you selected Reason B above.

1	
2	
3	





Due Diligence – New Account







Controlling Person tax residency self-certification form – TEMPLATE

Part 1 -	 Identification 	of a Controllin	g Person
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A. Name of Controlling Person:

· · · · · · · · · · · · · · · · · · ·
Family Name or Surname(s): •
Title:
First or Given Name: *
Middle Name(s):
B. Current Residence Address: Line 1 (e.g. House/Apt/Suite Name, Number, Street, if any)*
Line 2 (e.g. Town/City/Province/County/State)*
Country:*
Postal Code/ZIP Code (if any):*
C. Mailing Address: (please complete if Section B above not completed)
Line 1 (e.g. House/Apt/Suite Name, Number, Street)
Line 2 (e.g. Town/City/Province/County/State)
Country:
Postal Code/ZIP code:
D. Date of birth*(dd/mm/yyyy) E. Place of birth
Town or City of Birth*
Country of Birth*
F. Please enter the legal name of the relevant Entity Account Holder(s) of which you are a Controlling Person
Legal name of Entity 1
Legal name of Entity 2
Legal name of Entity 3





Controlling Person tax residency self-certification form – TEMPLATE

Part 2 – Country/Jurisdiction of Residence for Tax Purposes and related Taxpayer Identification Number or functional equivalent* ("TIN") (See Appendix)

Please complete the following table indicating (i) where the Controlling Person is tax resident; (ii) the Controlling Person's TIN for each country/jurisdiction indicated; and, (iii) if the Controlling Person is a tax resident in a country/jurisdiction that is a Reportable Jurisdiction(s) then please also complete Part 3 "Type of Controlling Person". Countries/Jurisdictions adopting the wider approach may require that the self-certification include a tax identifying number for each country/jurisdiction of residence (rather than for each Reportable Jurisdiction).

(You can also find out more about whether a country/jurisdiction is a Reportable Jurisdiction on the <u>DECD automatic exchange of</u> information portal).

If the Controlling Person is tax resident in more than three countries/jurisdictions, please use a separate sheet

If a TIN is unavailable please provide the appropriate reason A, B or C:

Reason A - The country/jurisdiction where the Controlling Person is resident does not issue TiNs to its residents

Reason B - The Account Holder is otherwise unable to obtain a TIN or equivalent number (Please explain why you are unable to obtain a TIN in the below table if you have selected this reason)

Reason C -No TIN is required. (Note. Only select this reason if the domestic law of the relevant jurisdiction does not require the collection of the TIN issued by such jurisdiction)

C	ountry/Jurisdiction of tax residence	TIN	If no TIN available enter Reason A, B or C
1			
2			
3			

Please explain in the following baxes why you are unable to obtain a TIN if you selected Reason B above.

1	
2	
3	

Part 3 - Type of Controlling Person

(Please only complete this section if you are tax resident in one or more Reportable Jurisdictions)

Please	provide the Controlling Person's Status by ticking the appropriate box.	Entity 1	Entity 2	Entity 3
a.	Controlling Person of a legal person - control by ownership			
b.	Controlling Person of a legal person - control by other means			
c.	Controlling Person of a legal person - senior managing official			
d.	Controlling Person of a trust - settlor			
e.	Controlling Person of a trust – trustee			
f.	Controlling Person of a trust – protector			
g.	Controlling Person of a trust – beneficiary			
h.	Controlling Person of a trust – other			
i.	Controlling Person of a legal arrangement (non-trust) - settlor-equivalent			
j.	Controlling Person of a legal arrangement (non-trust) – trustee-equivalent			
k.	Controlling Person of a legal arrangement (non-trust) – protector-equivalent			
ь.	Controlling Person of a legal arrangement (non-trust) – beneficiary-equivalent			
m.	Controlling Person of a legal arrangement (non-trust) – other-equivalent			





Reporting

II III

Reportable accounts:

Accounts held by one or more Reportable Persons or by a Passive Non-Financial Entity with one or more Controlling Persons that is a Reportable Person

 A Reportable Person is an individual or Entity resident in a Reportable Jurisdiction for tax purposes under the laws of that jurisdiction A person is considered to have a tax residence in a country if he/she, under the laws of that country, is liable to tax due to domicile, residence, place of management, or any other similar criterion

Controlling Persons

- Must be interpreted in a manner consistent with FATF recommendations;
 i.e. the natural person who exercises
 "control" over an Entity, (25% ownership)
- Example:

A owns 20% in Entity B held in the name of Individual C, pursuant to a contractual agreement, A also controls 10 % of shares in Entity B. A is considered a "Controlling Person"





Reporting

Ι	Π	III	Reportable Data:			
I. Identification information						
 Name Address Jurisdiction of Residence TINs 				Required for Individual and Entity Account Holders that are Reportable Persons, Entities with Controlling Persons that are Reportable Persons and the Controlling Persons themselves		
Date of birthPlace of birth				Required for Individuals / Controlling Persons only		
II. Account information						
	account n name and		ng number (if any) of the Reporting Institution	Required for all Reportable Accounts		
III. Financial information						
All Acco	All Accounts Account balance or value or, if the account was closed, the closure of the account			osed, the closure of the account		
Deposito	ory	Gross amount of interest paid or credited to the account				
Custodia	al	•	 Gross amount of interest paid or credited to the account Gross amount of dividends paid or credited to the account Gross amount of other income generated with respect to the assets held in the account paid or credited to the account Gross proceeds from the sale or redemption of Financial Assets paid or credited to the account 			
Other Ac only*	ccounts		Gross amount paid or credited to the Account Holder with respect to the account with respect to which the Reporting Financial Institution is the obligor or debtor			
*(i.e. not Depository or Custodial Accounts)						





Key Compliance Challenges

• Huge number of accounts subject to due diligence and reporting:

- All committed countries" vs. U.S., CRS reportable accounts, over 100 times those of FATCA
- De minimis for individual accounts does not apply
- No exemption for investment entities whose interests are regularly traded, i.e. FIs will need to identify such entities' controlling persons
- Monitoring and analyzing local legislation including variations country to another
 - Over 15 CRS requirements allow competent authorities a choice in how they are implemented
- Complexity of laws determining tax residence

TTT

- Self certifications by customers on tax residency must be "validated" by FIs based on KYC/AML bank information
- Complexities surrounding a "global compliance program"
 - Jurisdictional based variations imposed by local legislation
 - Account due diligence relies on bank KYC/AML procedures that differ country to another





Key Compliance Challenges (Cont.)

I II III

- Multiple reporting required (i.e. for individual customers who have multiple residences/controlling persons of a foreign entity in different jurisdictions)
- Additional contact with pre-existing customers may be required to obtain missing information
 - Implications on overall customer experience following FATCA communications
- Re-classifications required to address different definitions under CRS
 - Entity reclassification (e.g. Certain non-reporting FIs under FATCA are reporting institutions under CRS)
 - Product reclassification (e.g. excluded low risk accounts may vary by jurisdiction)





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We will answer as many questions as time permits. For queries, or for more information, please contact:

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MENA Financial Crime Compliance Group (MENA FCCG)

The voluntary Group comprises of senior compliance officers from 12 banks^{*} representing eight MENA countries, including; Bahrain, Egypt, Jordan, Kuwait, Lebanon, Oman, Qatar, and the UAE. The Group, launched in September 2016 and presided over by Mr. Wissam H. Fattouh, Secretary General for the Union of Arab Banks, seeks to bring collective action in the fight against financial crime. Michael Matossian, Chief Compliance Officer and EVP of Arab Bank was nominated to act as the Deputy Chair. The Group also includes MENAFATF as a technical Advisor and Thomson Reuters, providing administrative support.

The Group aims to act as a link and feedback channel between the private sector and external/global bodies/regulators. To that end, it will arrange for financial crime seminars and invite key international bodies, financial crime specialists, and global correspondent banks as a key dialogue mechanism. The establishment of the Group will also demonstrate that banks in the region are working together to share leading practices and to make MENA a safer and more secure place to do business.

Working documents and guidelines developed through its Working Committees will be published on Group Website, currently under development.

Further information and Contact Details E-mail: info@menafccg.com

*Abu Dhabi Commercial Bank, Arab Bank, Al Baraka Banking Group, Bank ABC, Bank Audi s.a.l, Bank Muscat, Boubyan Bank, Commercial Bank of Qatar, Emirates National Bank of Dubai, Kuwait International Bank, Mashreq Bank, National Bank of Egypt, National Bank of Kuwait





Thank you

