



**Issued by the Committee for Combating Extremism,
Terrorism and its Financing and Money Laundering**

**MINISTRY OF INTERIOR
KINGDOM OF BAHRAIN**

**NATIONAL ADVISORY ON THE IMPLEMENTATION OF
HUMANITARIAN CARVE-OUTS
UNDER THE UNITED NATIONS SECURITY COUNCIL
SANCTIONS REGIMES
KINGDOM OF BAHRAIN**

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Secretariat of the Committee for
Combating Extremism, Terrorism



EXECUTIVE SUMMARY

This Advisory provides national operational guidance on the implementation of humanitarian carve-outs under United Nations Security Council sanctions regimes, in accordance with United Nations Security Council Resolution 2664 (2022). It sets out the procedures and coordination arrangements through which the Kingdom of Bahrain gives effect to the humanitarian exemption established by that resolution, while maintaining full compliance with binding asset-freeze obligations.

Following the adoption of United Nations Security Council Resolution 2664 (2022), adopted under Chapter VII of the Charter of the United Nations, the Committee for Combating Extremism, Terrorism and its Financing and Money Laundering issued this Advisory to provide national operational guidance on the implementation of the humanitarian exemption established by that resolution. Resolution 2664 (2022) decides that, without prejudice to the obligations imposed on Member States to freeze the funds and other financial assets or economic resources of designated individuals and entities, the provision, processing, or payment of funds, other financial assets or economic resources, as well as the provision of goods and services necessary to ensure the timely delivery of humanitarian assistance or to support other activities that support basic human needs, are permitted and do not constitute a violation of asset-freeze measures imposed by the Security Council or its Sanctions Committees. The Resolution further requests that providers relying on this exemption use reasonable efforts, including strengthened risk-management and due-diligence strategies and processes, to minimize the accrual of any benefits prohibited by sanctions. This Advisory reflects those decisions and requests and sets out the corresponding national procedures for their consistent and effective implementation within the Kingdom of Bahrain.

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1. PURPOSE AND SCOPE

Purpose

The purpose of this Advisory is to provide clear national procedures for the implementation of humanitarian carve-outs established under United Nations Security Council Resolution 2664 (2022), in order to:

- Facilitate the timely delivery of humanitarian assistance and activities supporting basic human needs;
- Ensure that humanitarian carve-outs are relied upon in a manner consistent with Security Council decisions;
- Support reasonable risk-management and due-diligence efforts by relevant actors; and
- Preserve the integrity and effectiveness of Bahrain’s targeted financial-sanctions framework.

For the avoidance of doubt, the humanitarian carve-out established by United Nations Security Council

Resolution 2664 (2022) applies exclusively to asset-freeze measures and does not affect the application of travel bans or other sanctions measures, which remain subject to separate legal provisions and approval processes.

Scope

This Advisory applies to:

- All United Nations Security Council sanctions regimes implemented by the Kingdom of Bahrain;
- All competent authorities, supervisory bodies, financial institutions (FIs), and designated non-financial businesses and professions (DNFBPs); and
- All humanitarian activities and transactions relied upon pursuant to Resolution 2664 (2022).

2. LEGAL AND INTERNATIONAL FRAMEWORK

Humanitarian carve-outs are implemented in the Kingdom of Bahrain pursuant to:

- United Nations Security Council Resolution 2664 (2022);
- Relevant sanctions-regime resolutions and Committee guidance;
- Decree-Law No. (4) of 2001, as amended;
- Decree-Law No. (29) of 2020;
- Cabinet Decision No. (12) of 2021; and
- Ministerial Decision No. (120) of 2021.

These instruments collectively provide the legal basis for national coordination, monitoring, and reporting in support of the implementation of humanitarian carve-outs, without prejudice to the binding nature of Security Council decisions.



3. DEFINITION OF HUMANITARIAN CARVE-OUTS

For the purposes of this Advisory, a humanitarian carve-out refers to:

The reliance on the exemption established by United Nations Security Council Resolution 2664 (2022), under which the provision, processing, or payment of funds, other financial assets or economic resources, or the provision of goods and services necessary to ensure the timely delivery of humanitarian assistance or to support activities that support basic human needs, is permitted and does not constitute a violation of asset-freeze measures.

This exemption applies without prejudice to the obligation to freeze the assets of designated individuals and entities.

4. ELIGIBLE HUMANITARIAN ACTORS AND ACTIVITIES

Eligible Humanitarian Actors

Humanitarian carve-outs may be relied upon by the actors specified in operative paragraph 1 of Resolution 2664 (2022), including:

- United Nations entities, programmes, funds, and specialized agencies;
- International organizations;
- Humanitarian organizations having observer status with the United Nations General Assembly;
- Non-governmental organizations participating in United Nations Humanitarian Response Plans, Refugee Response Plans, other United Nations appeals, or OCHA-coordinated humanitarian clusters;

- Employees, grantees, subsidiaries, and implementing partners acting in those capacities; and
- Any additional actors as may be added by relevant Sanctions Committees within their respective mandates.

Eligible Humanitarian Activities

Eligible activities are those necessary to ensure the timely delivery of humanitarian assistance or to support activities that support basic human needs, as determined by the context of the relevant humanitarian operation.



5. NATIONAL COORDINATION AND NOTIFICATION ARRANGEMENTS

Role of the Secretariat

The Secretariat of the Committee serves as the national coordination point for humanitarian carve-outs and is responsible for:

- Receiving notifications and information relating to humanitarian activities relied upon pursuant to Resolution 2664 (2022);
- Coordinating with competent authorities and supervisory bodies for oversight and information-sharing purposes;
- Supporting national reporting and cooperation with United Nations mechanisms where required.

National coordination and notification arrangements do not constitute a condition for the permissibility of humanitarian activities under Resolution 2664 (2022) and do not alter the legal effect of the humanitarian exemption established by the Security Council.

Communication with the Relevant UNSC Committee

Where information is required to be transmitted to United Nations Sanctions Committees or other UN mechanisms, the Secretariat coordinates with the Ministry of Foreign Affairs through established diplomatic channels.

5. OBLIGATIONS OF FINANCIAL INSTITUTIONS AND DNFBPS

Financial institutions and DNFBPs must:

- Continue to implement all applicable asset-freeze obligations without prejudice;
- Process transactions relied upon pursuant to Resolution 2664 (2022) in accordance with its terms;
- Apply reasonable risk-management and due-diligence measures when relying on the humanitarian carve-out;

- Monitor transactions for indicators of diversion or misuse, consistent with a risk-based approach

Nothing in this Advisory alters existing obligations relating to sanctions compliance or suspicious-transaction reporting.

7. REPORTING, MONITORING, AND RECORD-KEEPING

Entities relying on humanitarian carve-outs must maintain appropriate records of transactions and activities conducted pursuant to Resolution 2664 (2022).

Competent authorities may collect and consolidate information for national oversight and to support cooperation with United Nations monitoring and

reporting mechanisms, consistent with operative paragraphs 5 and 6 of the Resolution.

Records must be retained for a minimum of five years and made available for supervisory or audit purposes, in accordance with national law.

8. RISK-MANAGEMENT AND SAFEGUARDS

All relevant actors are expected to use reasonable efforts, including strengthened risk-management and due-diligence processes, to minimize the risk of diversion or the accrual of prohibited benefits to designated individuals or entities, in line with operative paragraph 3 of Resolution 2664 (2022).

Where concerns arise regarding potential misuse, entities should escalate such concerns to the appropriate competent authority in accordance with existing reporting channels.

9. TRANSPARENCY AND PUBLIC GUIDANCE

The Committee's official website provides information on humanitarian carve-outs, relevant procedures, and points of contact. Any public guidance issued is

intended to support understanding and consistent implementation of Resolution 2664 (2022) and does not modify its legal effect.

CONCLUSION

Through this Advisory, the Kingdom of Bahrain gives effect to United Nations Security Council Resolution 2664 (2022) by setting out clear national procedures for reliance on the humanitarian carve-out established by the Security Council. These procedures support the timely delivery of humanitarian assistance and activities supporting basic human needs, while preserving the binding nature and effectiveness of targeted financial-sanctions measures.

All competent authorities, supervisory bodies, financial institutions, and DNFBPs must implement this Advisory in accordance with Resolution 2664 (2022) and applicable national law.

For further information: Secretariat of the Committee for Combating Extremism, Terrorism and its Financing and Money Laundering, Ministry of Interior, Kingdom of Bahrain.

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