



**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 TARGETED FINANCIAL SANCTIONS IN THE KINGDOM OF BAHRAIN

January 2023

Version: 2023 Edition
(supersedes the 2022 Edition)



EXECUTIVE SUMMARY

The Advisory on the Implementation of Targeted Financial Sanctions in the Kingdom of Bahrain provides guidance on the national framework for implementing the Kingdom's binding obligations under United Nations Security Council Resolutions relating to terrorism, terrorist financing, and the proliferation of weapons of mass destruction. It brings together the relevant legislative and regulatory instruments applicable to targeted financial sanctions and outlines the respective roles and responsibilities of competent authorities, supervisory authorities, and entities subject to sanctions obligations.

The national mechanism for implementing listing and delisting decisions is structured through Ministerial Decision No. (14) of 2023, which establishes the procedures for publication, circulation, reporting, and documentation of measures taken in respect of national and United Nations sanctions decisions. Under this framework, freezing measures must be implemented without delay and in any event within 24 hours of publication, in accordance with applicable national legislation.

The Secretariat of the Committee for Combating Extremism, Terrorism and its Financing and Money Laundering serves as the central coordination authority for receiving and disseminating sanctions-related communications, maintaining the national register of actions taken, and coordinating with the Ministry of Foreign Affairs for communication with the United Nations where required.

Through the formalization of implementation procedures and strengthened inter-agency coordination, the Kingdom of Bahrain ensures the consistent and effective application of targeted financial sanctions in accordance with its national laws and international obligations.

INTRODUCTION

The Kingdom of Bahrain reaffirms its steadfast commitment to countering terrorism and extremism in all their forms and manifestations, guided by the directives and vision of His Majesty King Hamad bin Isa Al Khalifa.

Under His Majesty’s leadership, Bahrain has adopted a comprehensive national approach to combating terrorism and its financing, strengthening institutional coordination and enhancing cooperation with regional and international partners. This approach reflects the Kingdom’s firm rejection of all forms of terrorism and its determination to prevent the misuse of financial and economic systems for unlawful purposes.

As a Member State of the United Nations, the Kingdom of Bahrain bears binding obligations to implement all relevant United Nations Security Council Resolutions adopted under Chapter VII of the Charter of the United Nations. These obligations form an essential component of Bahrain’s contribution to maintaining international peace and security and protecting the integrity of the global financial system.

In furtherance of these obligations, the Kingdom continues to strengthen its legal and institutional framework for the implementation of targeted financial sanctions. Through the issuance of Ministerial Decision No. (14) of 2023, the national mechanism governing the circulation, execution, reporting, and documentation of listing and delisting decisions has been formally structured to ensure uniform implementation across competent authorities and supervisory bodies.

Accordingly, this Advisory sets out the national framework, coordination arrangements, and procedural guidance for implementing targeted financial sanctions within the Kingdom of Bahrain. It clarifies the respective responsibilities of competent authorities, supervisory bodies, and entities subject to sanctions obligations, and ensures that all relevant United Nations Security Council decisions relating to terrorism and the proliferation of weapons of mass destruction are implemented without delay and in accordance with applicable national legislation.

This Advisory applies to competent authorities, including ministries, regulatory bodies, and law enforcement agencies, as well as supervisory authorities overseeing the financial and non-financial sectors and other entities subject to sanctions obligations under national law.

Through these measures, the Kingdom of Bahrain reaffirms its commitment to safeguarding national security, upholding the rule of law, and ensuring effective compliance with its international obligations.

TABLE OF CONTENTS

1. Legal Framework	06
2. Implementation of the International (UN) List	07
3. UN Delisting Requests by Listed Individuals and Entities	10
4. Implementation of UNSCRs on Weapons of Mass Destruction (WMDs)	12
5. National Listing and Delisting Procedures	14
6. Domestic Measures for Unfreezing and Humanitarian Access	16
7. Criteria for Designations	18
8. National Compliance Architecture and Oversight Framework	20

1. LEGAL FRAMEWORK

The implementation of Targeted Financial Sanctions (TFS) in the Kingdom of Bahrain is grounded in the Kingdom's national AML/CFT legislative framework and in its binding obligations under United Nations Security Council Resolutions adopted pursuant to Chapter VII of the Charter of the United Nations.

National Legislative and Executive Instruments

The legal basis for the implementation of targeted financial sanctions includes:

1. Decree-Law No. (4) of 2001 on the Prohibition and Combating of Money Laundering, as amended by:
 - Decree-Law No. (36) of 2017 – strengthens the prescribed penalties for terrorist-financing offences;
 - Decree-Law No. (57) of 2018 – updates the definition of “terrorism”; and
 - Decree-Law No. (29) of 2020 – affirms the obligation to implement measures *without delay*, expands the definition of “funds” to include digital assets, and introduces administrative sanctions.
2. Law No. (58) of 2006 on the Protection of Society from Terrorist Acts – defines “terrorist act” and constitutes the substantive legal basis for national listing decisions.
3. Decree No. (50) of 2020 concerning the establishment and composition of the Committee for Combating Extremism, Terrorism and their Financing and Money Laundering, and designating its Secretariat as the national coordinating and implementing authority.
4. Cabinet Decision No. (12) of 2021 concerning national terrorism lists and the implementation of United Nations Security Council resolutions adopted under Chapter VII of the UN Charter

on preventing, suppressing, and ceasing the proliferation of weapons of mass destruction – specifies the procedures for implementing Security Council resolutions, managing national terrorist lists, handling delisting and humanitarian-access requests (including applications to use frozen funds to cover basic and extraordinary expenses), and publishing sanctions decisions.

5. Ministerial Decision No. (120) of 2021 concerning the mechanisms for reporting information and measures taken, and for receiving applications to authorize the use of frozen funds of listed persons under the national sanctions and terrorism lists, as well as the conditions and procedures for managing such funds. It establishes a mandatory 24-hour reporting obligation with acknowledgment of receipt and sets the conditions for appointing a manager of frozen funds.
6. Ministerial Decision No. (14) of 2023 which establishes the national mechanism for the implementation of United Nations Security Council resolutions and national terrorism listings. This decision defines the binding operational procedures for circulating UNSCR listings, acknowledging receipt, implementing freezing measures without delay, reporting actions taken, updating the national register, and ensuring consistent coordination among competent authorities, supervisory bodies, and regulated entities. It operationalises the obligations set out in Cabinet Decision No. (12) of 2021 and Ministerial Decision No. (120) of 2021 by standardising publication, circulation, reporting, and registration procedures.

United Nations Security Council Resolutions

Pursuant to Article 10(7) of Decree-Law No. (29) of 2020, all persons and entities within the Kingdom are required to implement relevant United Nations Security Council Resolutions without delay.

These include, inter alia:

- o Terrorism and Terrorist Financing: 1267 (1999), 1373 (2001), 1988 (2011), 1989 (2011), 2253 (2015), 2368 (2017), 2170 (2014), 2178 (2014), 2396 (2017), 2462 (2019), and successor resolutions.
- o Proliferation of Weapons of Mass Destruction: 1718 (2006) and subsequent resolutions

concerning the Democratic People's Republic of Korea; 2231 (2015) concerning Iran; and 2664 (2022) concerning humanitarian exemptions under United Nations sanctions regimes.

The obligations arising from these resolutions are implemented in accordance with Cabinet Decision No. (12) of 2021 and the formal mechanism established under Ministerial Decision No. (14) of 2023.

2. IMPLEMENTATION OF THE INTERNATIONAL (UN) LIST

Purpose

This section sets out Bahrain's national mechanism for the immediate implementation of designations, amendments, and delistings issued by the United Nations Security Council and its Sanctions Committees. It ensures that competent authorities, supervisory authorities, and entities subject to sanctions obligations give full and timely effect to terrorism-related targeted financial sanctions in line with Legislative Decree No. (4) of 2001 (as amended), Decree-Law No. (29) of 2020, Cabinet Decision No. (12) of 2021, Ministerial Decision No. (120) of 2021, and Ministerial Decision No. (14) of 2023. The mechanism establishes clear procedures to implement Security Council decisions without delay, prevent the movement or dissipation of assets, protect bona fide third parties, and maintain consistent national compliance. It also provides a structured communication process to ensure rapid and uniform dissemination of United Nations listings to all obligated entities.

Receipt of UN Notifications

- The Secretariat of the Committee for Combating Extremism, Terrorism and its Financing and Money Laundering receives official notifications of new designations, amendments, and delistings directly from the UNSC or its Sanctions Committees.

- Each communication is authenticated and recorded electronically, noting the exact date and time of receipt.
- The Secretariat classifies each notice as a listing, amendment, or delisting to determine the follow-up actions required.
- The Secretariat initiates internal processing immediately to ensure implementation begins without delay and to prevent any opportunity for movement or concealment of funds or assets linked to designated persons or entities.

Circulation to Competent Authorities

- Within 24 hours of receipt, the Secretariat circulates the UN communication and annexes to competent authorities and supervisory authorities through the secure electronic platform. Supervisory authorities ensure onward circulation to entities under their supervision in accordance with their respective mandates.
- The circular includes:
 - o the official UN notice and annexes;
 - o identifying data of the listed person or entity; and

- o instructions to implement freezing measures without prior notice and without delay.
- All competent authorities and supervisory authorities must acknowledge receipt through the secure electronic platform.

Immediate Implementation of Freezing Measures

- Upon notification, competent authorities and entities subject to sanctions obligations must:
 - o screen all customers, beneficial owners, counterparties, and transactions against the updated UN list using reasonable measures to ensure screening accuracy;
 - o identify and freeze immediately any funds or other assets owned or controlled, directly or indirectly, by designated persons or entities;
 - o prevent any movement, transfer, withdrawal, conversion, or use of such funds or other assets;
 - o prevent the making available of any funds, assets, or financial services, directly or indirectly, to a designated person or entity.
- All freezing actions must be executed within 24 hours, consistent with Article 10(7) of Decree-Law No. 29 of 2020.
- Freezing measures must be applied before any public announcement to avoid alerting the designated person and enabling asset flight or dissipation.

Reporting to the Secretariat

- Entities subject to sanctions obligations must report implementation measures to their respective supervisory authority within 24 hours, including:
 - o confirmation of screening and implementation;
 - o positive match details, including the type, value, and location of funds or other assets frozen; or
 - o a nil return where no match is identified.
- Supervisory authorities must transmit consolidated confirmations, including positive matches and nil returns, to the Secretariat within the prescribed timeframe, in accordance with Ministerial Decision No. (120) of 2021.

- Reports must be submitted through the secure electronic platform.
- Entities must take reasonable measures to verify potential matches before submission in order to reduce false positives and false negatives.

Follow-Up on Positive Matches

- The Secretariat reviews information received through supervisory authorities concerning potential matches to confirm consistency with the relevant United Nations designation.
- Where a match is confirmed, the Secretariat coordinates with the Ministry of Foreign Affairs (MOFA) for official communication to the relevant United Nations Sanctions Committee.
- The Ministry of Foreign Affairs, through the Permanent Mission of the Kingdom of Bahrain to the United Nations in New York, informs the relevant United Nations body that the freezing action has been implemented in accordance with the applicable Security Council resolution.
- Competent authorities may undertake follow-up inquiries, where appropriate, to determine whether additional assets, accounts, or related interests are owned or controlled, directly or indirectly, by the designated person or entity.
- Relevant correspondence and supporting documentation are recorded in the national register and retained in accordance with applicable national requirements.
- Any inconsistencies, errors, or incomplete information identified during follow-up must be corrected without delay.

Implementation of Delistings

- Delisting communications issued by the United Nations Security Council or its Sanctions Committees are published and circulated through the secure electronic platform to competent authorities and supervisory authorities without delay.
- Supervisory authorities are responsible for ensuring prompt onward notification to entities under their supervision.

- Upon delisting, freezing measures applied solely on the basis of the prior designation must be lifted without delay, and affected funds or other assets must be unblocked or released in accordance with applicable procedures.
- Entities must confirm implementation of unfreezing actions to their supervisory authority within 24 hours, and supervisory authorities must report completion to the Secretariat through the electronic platform.
- Any legal, operational, or procedural issue that may delay the release of assets must be escalated to the Secretariat for coordination and resolution.

Publication of Updated Lists

- The Secretariat publishes United Nations designations, amendments, and delistings on the Committee's official website and ensures publication in the Official Gazette in accordance with Article 20 of Cabinet Decision No. (12) of 2021.
- Competent authorities and supervisory authorities must ensure that entities under their supervision update relevant records and screening processes accordingly.
- Confirmation of necessary updates must be communicated through the established reporting process.

Documentation and Recordkeeping

- The Secretariat maintains a national register of listings, delistings, and measures taken, in accordance with Cabinet Decision No. (12) of 2021 and Ministerial Decision No. (14) of 2023.
- Relevant documentation is retained in accordance with applicable national requirements and is available for competent review when required.

3. UN DELISTING REQUESTS BY LISTED INDIVIDUALS AND ENTITIES

Purpose

This section outlines the procedures available to individuals and entities listed under United Nations Security Council sanctions to request delisting. It describes the channels through which a petition may be submitted and the role of the Secretariat in facilitating communication through official national and international procedures.

These procedures apply to individuals and entities listed under the ISIL (Da'esh) and Al-Qaida Sanctions List and any other United Nations sanctions regime that provides for delisting requests by listed parties.

Submission of Delisting Requests

Through the Secretariat

- Listed individuals or entities may seek delisting under the relevant United Nations Security Council resolutions.
- A delisting request may be submitted to the Secretariat for onward transmission through official channels in coordination with the Ministry of Foreign Affairs, or, where applicable, directly to the United Nations Office of the Ombudsperson in cases relating to the ISIL (Da'esh) and Al-Qaida Sanctions List.
- Petitioners submitting a request through the Secretariat should use the standard Delisting Request Form annexed to this Advisory, where applicable.
- A delisting request must include:
 - o a clear explanation of why the listing criteria no longer apply;
 - o details of any change in circumstances, activities, or associations;
 - o updated identifying information, including aliases and identifiers;
 - o supporting documentation demonstrating that

the basis for the original listing is no longer applicable or was applied in error;

- o in the case of deceased individuals, official documentation confirming death and, where applicable, information relating to legal beneficiaries or joint ownership of assets. .
- Upon receipt of a delisting request, the Secretariat:
 - o acknowledges receipt to the petitioner;
 - o reviews the submission for completeness;
 - o coordinates with the Ministry of Foreign Affairs for onward transmission to the appropriate United Nations mechanism where required; and
 - o records the request and related correspondence in accordance with applicable national procedures.

Directly to the UN Ombudsperson

- Listed individuals or entities may submit a delisting request directly to the UN Office of the Ombudsperson, which reviews petitions and makes recommendations to the UN Sanctions Committee.
- Direct petitions may be submitted via:
 - o Ombudsperson Website: <https://www.un.org/securitycouncil/ombudsperson>
 - o Ombudsperson Email: ombudsperson@un.org
- Petitions submitted directly to the Ombudsperson must follow the procedures published on the Ombudsperson's website, including:
 - o a written submission explaining why the listing is no longer justified or was incorrect;
 - o relevant identifying information and supporting documentation;

- o authorization for any representative acting on behalf of the petitioner;
- o cooperation with the Ombudsperson during the information-gathering and review stages.

Processing and Status Pending a UN Decision

- Once transmitted, delisting requests are considered under UN procedures applicable to the relevant sanctions regime.
- Until an official delisting decision is issued by the United Nations and formally communicated through the established national channels, all freezing measures remain in effect and must continue to be implemented.

Implementation Following a Delisting Decision

- Where the relevant United Nations body approves a delisting, the Secretariat ensures publication and circulation without delay in accordance with the national mechanism established under Cabinet Decision No. (12) of 2021 and Ministerial Decision No. (14) of 2023.
- Following publication and circulation:
 - o competent authorities and supervisory authorities must ensure that freezing measures applied solely on the basis of the prior designation are lifted without delay;
 - o supervisory authorities must ensure entities under their supervision take the necessary unfreezing actions;

- o confirmation of unfreezing actions must be reported within 24 hours in accordance with the reporting mechanism under Ministerial Decision No. (120) of 2021 and the implementation mechanism under Ministerial Decision No. (14) of 2023.

- The operational steps for publication, circulation, reporting, and registration of delisting actions are implemented in accordance with Section 2 of this Advisory.

4. IMPLEMENTATION OF UNSCRS ON WEAPONS OF MASS DESTRUCTION (WMDS)

Purpose

This section outlines Bahrain's national mechanism for implementing targeted financial sanctions and related prohibitions concerning the proliferation of weapons of mass destruction and their financing.

These measures arise from United Nations Security Council Resolution 1718 (2006) and subsequent resolutions relating to the Democratic People's Republic of Korea, Resolution 2231 (2015) relating to Iran, and Resolution 1540 (2004).

Implementation is carried out in accordance with Cabinet Decision No. (12) of 2021 and the formalized national mechanism established under Ministerial Decision No. (14) of 2023.

Receipt, Publication, and Circulation

- The Secretariat receives official notifications of WMD-related designations, amendments, and delistings from the United Nations Security Council or its Sanctions Committees.
- In accordance with Ministerial Decision No. (14) of 2023, such decisions are published without delay and disseminated through the secure electronic coordination system.
- The electronic system ensures standardized circulation to competent authorities and supervisory authorities.
- Recipients must acknowledge receipt electronically and ensure implementation within the prescribed legal timeframe.

Immediate Implementation of Targeted Financial Sanctions

Upon publication of a WMD-related designation:

- Competent authorities and entities subject to

sanctions obligations must screen relevant records and transactions against the updated WMD-related sanctions lists.

- Any funds or economic resources owned or controlled, directly or indirectly, by designated persons or entities must be frozen without delay and in any event within 24 hours.
- No funds, financial services, or economic resources may be made available, directly or indirectly, to designated persons or entities.

Freezing measures must be implemented in accordance with Decree-Law No. (29) of 2020 and related national legislation.

Reporting and Notification

- Entities must submit reports of confirmed matches, freezing measures, or nil returns to their respective supervisory authority within 24 hours.
- Supervisory authorities must transmit confirmations to the Secretariat through the electronic reporting mechanism in accordance with Ministerial Decision No. (120) of 2021.
- Where required under the relevant United Nations resolution, the Secretariat coordinates with the Ministry of Foreign Affairs for official communication to the appropriate United Nations body.
- Measures taken are recorded in the national sanctions register in accordance with Ministerial Decision No. (14) of 2023.

Activity-Based Prohibitions

In accordance with relevant United Nations Security Council resolutions:

- No person or entity may finance, facilitate, insure, broker, supply, transfer, or otherwise support

activities involving items, materials, equipment, goods, or technology prohibited under the applicable WMD-related sanctions regimes.

- Competent authorities must refuse, suspend, or revoke licenses, approvals, or authorizations where necessary to ensure compliance with relevant Security Council measures.
- Entities must not engage in transactions that would directly or indirectly support sanctioned programmes, designated persons, or prohibited activities.

Trade and Sectoral Responsibilities

- Competent authorities responsible for trade, customs, licensing, and regulatory oversight must enforce applicable prohibitions established under relevant United Nations Security Council resolutions.
- Entities operating in regulated sectors must ensure compliance with WMD-related sanctions requirements within the scope of their supervisory framework.

Delisting and Record Maintenance

- Delisting decisions relating to WMD sanctions are implemented through the same publication, circulation, and reporting mechanism described above.
- Upon circulation of a delisting decision, freezing measures applied solely on the basis of the prior designation must be lifted without delay.
- Documentation relating to publication, freezing, unfreezing, and reporting actions must be maintained in accordance with applicable national record-keeping requirements.



5. NATIONAL LISTING AND DELISTING PROCEDURES

Purpose

This section establishes Bahrain's national procedures for adding or removing individuals or entities from the National Terrorist List in accordance with United Nations Security Council Resolution 1373 (2001), Law No. (58) of 2006 on the Protection of Society from Terrorist Acts, and Cabinet Decision No. (12) of 2021. It ensures that national listings are implemented without delay in accordance with United Nations Security Council Resolution 1373 (2001) and applicable national requirements, including freezing obligations, prohibitions on making funds available, and mechanisms for review, delisting, and humanitarian exemptions. Ministerial Decision No. (14) of 2023 sets out the unified national process for circulating, acknowledging, and implementing national listing and delisting decisions.

Initiating a Proposal for National Listing

- A proposal to designate an individual or entity may be initiated when there are reasonable grounds to suspect or a reasonable basis to believe, supported by credible and verifiable information, that the individual or entity meets the criteria under Cabinet Decision No. (12) of 2021 and UNSCR 1373 (2001).
- A proposal may originate from:
 - the Secretariat;
 - competent national authorities, including law-enforcement, intelligence, supervisory, or regulatory bodies; or
 - foreign states or international organizations transmitted through official channels and subject to assessment against national evidentiary standards.
- A proposal is justified when verifiable information indicates that the person or entity has:
 - committed, attempted, participated in, or facilitated a terrorist act;

- provided or collected funds or other resources for terrorist acts or organizations; or
- owned, controlled, or acted on behalf of such persons or entities.
- These designation criteria reflect UNSCR 1373 (2001) and are consistent with the evidentiary standard applied in the ISIL (Da'esh) and Al-Qaida sanctions regime.

Preparation of the Listing File

- The Secretariat prepares a Listing File including:
 - full identifying information (names, aliases, DOB/POB, nationality, passport/ID numbers, addresses, business registrations, financial identifiers);
 - a factual narrative linking the individual or entity to terrorist activity or terrorist financing;
 - supporting intelligence, law-enforcement, security, supervisory, or judicial information;
 - an assessment confirming that the case meets the criteria under Articles 2–8 of Cabinet Decision No. (12) of 2021.
- The Secretariat must:
 - verify the reliability, credibility, and source of information;
 - ensure completeness and sufficiency to meet national evidentiary standards;
 - coordinate with domestic and foreign authorities through MOFA where needed;
 - handle classified information in line with national security protocols.

Committee Review and Cabinet Approval

- The Secretariat submits the verified Listing File to the Committee for Combating Extremism, Terrorism

and their Financing and Money Laundering for deliberation.

- The Committee reviews the file and, if satisfied that the evidentiary threshold is met, recommends designation to the Cabinet of Ministers.
- The Cabinet of Ministers issues a Cabinet Decision formally designating the individual or entity.
- The Secretariat circulates the decision without delay to all competent authorities through the secure electronic platform in accordance with Ministerial Decision No. (14) of 2023.
- All entities must implement freezing actions without delay and in any event within 24 hours, consistent with Decree-Law No. (29) of 2020 and Cabinet Decision No. (12) of 2021.

Notification of Designation

- As soon as practicable after the designation takes effect, the Secretariat notifies the designated person or entity, subject to security considerations.
- Notification includes:
 - the fact and consequences of designation;
 - available review and delisting mechanisms;
 - relevant government contact points.

Implementation and Reporting

- Competent authorities, FIs, and DNFBPs must: Upon authorization, the relevant authority ensures that approved funds are released without delay.
 - screen customers, transactions, and beneficial ownership records against the updated list;
 - freeze all funds or assets owned or controlled, directly or indirectly, by listed persons or entities;
 - ensure no funds, assets, or economic resources are made available to them;
 - submit confirmation of implementation or a nil return to the Secretariat within 24 hours.
- The Secretariat consolidates acknowledgments and implementation reports into a verification file and submits it to the Committee Chair for oversight.

Publication of Listings and Delistings

- The Secretariat publishes all Cabinet Decisions on the Committee's website, in parallel with publication in the Official Gazette, pursuant to Article 20 of Cabinet Decision No. 12 of 2021.
- Competent authorities and regulated entities must update internal screening systems upon publication.

Record Keeping and Verification

- The Secretariat maintains a centralized electronic database for all listing and delisting actions, including:
 - proposals and supporting documents;
 - Cabinet Decisions and implementation reports; publication proof and follow-up actions.
- The Secretariat must conduct periodic reviews of all listing and delisting records to ensure accuracy and completeness and must make these records available for supervisory inspection, domestic review, and international evaluation upon request.
- Records must be retained for a minimum of five years and be accessible for supervisory inspection, national review, and international cooperation.

6. DOMESTIC MEASURES FOR UNFREEZING AND HUMANITARIAN ACCESS

Purpose

This section explains how requests to access or unfreeze frozen funds are submitted, assessed, and executed under national law and relevant United Nations Security Council Resolutions (UNSCRs). It ensures that humanitarian or basic-expense access is processed transparently, subject to oversight, and without delay (within 24 hours) of authorization.

Submission of Requests

- Any individual or entity whose funds or other assets are frozen under a Cabinet or UN decision may apply to the Secretariat of the Committee for authorization to use part of those funds.
- Requests may be lodged electronically via the Committee's official website or submitted in writing to the Secretariat.
- Each request must specify:
 - the amount requested and intended purpose;
 - whether it relates to basic expenses (food, rent, medical care, utilities, legal fees) or extraordinary expenses (contractual obligations or other exceptional needs); and
 - supporting documents such as invoices, medical reports, contracts, or bank statements.

Acknowledgment and Initial Review

- The Secretariat acknowledges receipt within 24 hours and enters the request into its electronic system.
- The Secretariat reviews the submission for completeness.
- Incomplete submissions are returned immediately with a written notice specifying the missing information.

Assessment and Coordination

- The Secretariat evaluates each request in coordination with relevant competent authorities, where appropriate.
- The assessment determines:
 - that the requested funds fall within categories permitted under Cabinet Decision No. (12) of 2021;
 - that the proposed use does not contravene national law or applicable United Nations obligations;
 - that the request does not create a risk of funds being diverted for prohibited purposes.
- Where required, the Secretariat coordinates with the Ministry of Foreign Affairs for transmission to the relevant United Nations Sanctions Committee.

Committee Review and Authorization

- The Secretariat submits the request and assessment to the Committee for Combating Extremism, Terrorism and its Financing and Money Laundering for consideration.
- If approved, the Secretariat issues written authorization specifying the permitted amount and purpose.
- Where the request concerns a person or entity listed by the United Nations, implementation occurs only after receipt of a no-objection or approval from the relevant United Nations body.

Release of Authorized Funds

- Upon authorization, the relevant financial institution or entity must release the approved

funds within 24 hours and submit confirmation to the Secretariat.

- Confirmation must include the amount released, date of disbursement, beneficiary details, and authorized purpose.
- Any deviation from the authorized purpose may result in the reapplication of freezing measures in accordance with national law.

Humanitarian carve-out in accordance with UNSCR 2664 (2022)

In accordance with United Nations Security Council Resolution 2664 (2022), humanitarian activities conducted by eligible humanitarian actors are not subject to asset-freeze prohibitions under applicable United Nations sanctions regimes.

- Requests relating to humanitarian operations may be submitted to the Secretariat.
- The Secretariat coordinates with the Ministry of Foreign Affairs where United Nations notification or approval is required.
- Upon confirmation of authorization, approved funds may be released without delay and in accordance with the applicable decision.

7. CRITERIA FOR DESIGNATIONS

Purpose

This section establishes the criteria, evidentiary standards, and procedural safeguards for identifying and designating individuals or entities on the National Terrorist List. It ensures that all designations are evidence-based, proportionate, timely, and compliant with national legislation and Bahrain's obligations under UNSCR 1373 (2001), UNSCR 1267 (1999), UNSCR 1989 (2011) and UNSCR 2253 (2015).

These criteria apply to:

2. All proposals submitted by the Secretariat, competent authorities, or partner states seeking to designate individuals or entities on the National Terrorist List.
3. All assessments of foreign or international requests under UNSCR 1373 and other relevant UNSCRs for domestic implementation.
4. All periodic reviews to confirm that ongoing designations continue to meet the applicable criteria.

Core Criteria for Designation

- An individual or entity may be proposed for designation when credible and verifiable information establishes reasonable grounds to suspect or reasonable grounds to believe that they have:
 - o Committed or attempted to commit a terrorist act, as defined in Article 1 of Law No. 58 of 2006;
 - o Participated in, organized, facilitated, or supported the commission of a terrorist act or the activities of a terrorist organization;
 - o Provided, collected, received, or made available funds, financial services, economic resources, or other assets, directly or indirectly, with the

intent or knowledge that they be used for terrorism or by a terrorist group;

- o Owned, controlled, directed, or influenced, directly or indirectly, funds or other assets belonging to a designated person or entity;
- o Acted on behalf of, at the direction of, or in support of a designated person or entity, including assisting in the evasion of freezing measures.

Evidentiary Requirements

- Each proposing competent authority must submit a designation request supported by the evidentiary threshold of reasonable grounds to suspect or believe, in line with national legislation and established evidentiary practices.
- Each proposal must include a Designation Dossier containing:
 - o Comprehensive identifying information (full names, aliases, DOB/POB, nationality, addresses, passport/ID details, legal identifiers, and financial information);
 - o Intelligence, law-enforcement information, or other credible closed-source or open-source material linking the subject to terrorism or terrorist financing;
 - o Any relevant judicial, administrative, or supervisory findings;
 - o A concise narrative summary demonstrating how the information satisfies the designation criteria.
- The Secretariat reviews and verifies the reliability, credibility, and completeness of all information provided in the dossier.
- The Secretariat may request supplementary information from competent authorities where clarification or additional verification is required.

- Classified or sensitive information is handled in accordance with national security protocols to protect sources while permitting its use in the designation process.

Coordination Among Competent Authorities

- The Secretariat must coordinate with law-enforcement, security, intelligence, supervisory, and financial authorities to ensure the accuracy and completeness of all information supporting a designation.
- In cross-border cases, the Secretariat cooperates with foreign counterparts through the Ministry of Foreign Affairs, in line with domestic legislation and Cabinet Decision No. 12 of 2021.
- Competent authorities must ensure timely information sharing to support implementation without delay.

Committee Review and Decision

- The Secretariat compiles and presents the verified Designation Dossier to the Committee for Combating Extremism, Terrorism and their Financing and Money Laundering.
- The Committee reviews whether the evidentiary threshold is met and decides whether to recommend designation to the Cabinet of Ministers.
- If approved, the Cabinet of Ministers issues a Cabinet Decision designating the person or entity on the National Terrorist List.
- The Secretariat circulates the decision without delay to competent authorities and regulated entities and ensures publication in the Official Gazette and on the Committee's website in accordance with Cabinet Decision No. 12 of 2021 and Ministerial Decision No. 14 of 2023.

Review and Delisting Triggers

- Competent authorities must notify the Secretariat when new information indicates that a listed individual or entity may no longer meet designation criteria.

- The Secretariat conducts periodic reviews of all listings to assess ongoing compliance with designation standards.
- A recommendation for delisting is prepared when:
 - o new information demonstrates the criteria are no longer met;
 - o the person is deceased or the entity no longer exists;
 - o any other reason indicates that the designation is no longer justified.
- Delisting follows the same evidentiary and procedural standards as initial designation.

Record Keeping and Documentation

- Competent authorities must maintain complete and accurate records of all designation proposals, supporting evidence, and correspondence submitted to the Secretariat.
- The Secretariat must maintain electronic Designation and Delisting Files containing:
 - o The proposal and supporting evidence;
 - o Inter-agency correspondence;
 - o Committee recommendations and Cabinet Decisions;
 - o Implementation reports and publication records.
- Records must be retained for a minimum of five years and may be extended for supervisory or audit purposes.
- Records must be made available for supervisory inspection, national review, or international evaluation upon request.

8. NATIONAL COMPLIANCE ARCHITECTURE AND OVERSIGHT FRAMEWORK

Purpose

This section describes Bahrain's national coordination and oversight arrangements for implementing targeted financial sanctions. It outlines how the Secretariat of the Committee oversees operational functions, coordinates with competent authorities, monitors national compliance, and supports accountability across supervisory bodies and regulated entities. These coordination and reporting arrangements operate in accordance with Ministerial Decision No. (14) of 2023 and give effect to Bahrain's obligations under relevant United Nations Security Council Resolutions and applicable international AML/CFT standards.

Central Coordination and Authority

- The Secretariat of the Committee for Combating Extremism, Terrorism and its Financing and Money Laundering acts as the central operational authority for all matters related to TFS implementation.
- Upon receiving UN or domestic sanctions communications, the Secretariat authenticates, logs, and circulates these communications through the national coordination system.
- As part of its coordination role, the Secretariat:
 - o circulate decisions to competent authorities, supervisory authorities, and entities subject to sanctions obligations;
 - o verify that freezing, unfreezing, and reporting actions are executed without delay (within 24 hours);
 - o maintain a centralized record of implementation data; and
 - o prepare verification and implementation summary reports for the Committee and the National AML/CFT Committee.
- Competent authorities must implement sanctions-

related instructions and requirements issued through the Secretariat in accordance with national law.

Integrated Electronic Coordination System

- The Secretariat maintains and operates a secure electronic platform that links ministries and supervisory authorities for receiving, acknowledging, and tracking sanctions communications.
- The national system:
 - o disseminates sanctions notifications in real time to obligated entities;
 - o receives acknowledgments, confirmations, and nil returns;
 - o tracks statutory deadlines to support timely implementation.
- Competent authorities and supervisory authorities must use the platform to:
 - o receive sanctions notifications;
 - o submit acknowledgments and implementation reports;
 - o meet reporting deadlines;
- Platform access is role-based and restricted to authorized users.
- The system supports real-time monitoring and the production of implementation status reports for reporting to the Committee.

Designation of Focal Points

- Each ministry, supervisory body, and law-enforcement or intelligence agency must designate a TFS Focal Point to act as the primary contact with the Secretariat.

- TFS Focal Points must:
 - o promptly disseminate Secretariat notifications within their institution;
 - o ensure immediate operational implementation of all sanctions-related instructions;
 - o submit acknowledgments, verification reports, and any required documentation through the electronic coordination system within 24 hours.
- All designated institutions must ensure that their TFS Focal Point has the authority, access, and resources necessary to fulfil these responsibilities.
- The Secretariat maintains a national registry of TFS Focal Points and provides orientation and technical guidance to support effective coordination.

Monitoring, Verification, and Reporting

- The Secretariat monitors national TFS implementation on an ongoing basis by reviewing information submitted by competent authorities, supervisory authorities, and entities subject to sanctions obligations.
- Verification reviews assess:
 - o timeliness and completeness of freezing, unfreezing, and reporting actions;
 - o adequacy of institutional compliance controls related to sanctions implementation.
- Summary updates may be provided to the Committee and relevant national coordination bodies to support oversight of implementation and follow-up where needed.
- Where deficiencies are identified, supervisory authorities initiate corrective actions in accordance with applicable legislation.

Transparency and Public Communication

- The Committee's official website serves as the national public portal for sanctions-related information.
- The website provides access to:
 - o updated national and UN sanctions lists;

- o procedures for listing, delisting, and humanitarian-access requests;
- o relevant forms and contact points;
- o explanatory material to support compliance by FIs and DNFBPs.
- The Secretariat ensures that published information is accurate, up-to-date, and consistent with Bahrain's international obligations.

Enforcement and Accountability

- Failure to implement TFS measures within the prescribed timeframe constitutes a violation under Decree-Law No. 4 of 2001 and Decree-Law No. 29 of 2020.
- Supervisory bodies and competent authorities must:
 - o identify and record breaches;
 - o notify the Secretariat of any non-compliance detected within their jurisdiction; and
 - o take administrative or criminal action, as appropriate.
- Sanctions for non-compliance include:
 - o administrative fines up to BHD 50,000 under Article 2 bis of Decree-Law 29 (2020);
 - o criminal penalties for wilful obstruction or delay under Article 3 (6-3) of Decree-Law 4 (2001);
 - o regulatory actions such as warnings, license suspension, or withdrawal for repeated violations.
- Regulated entities are expected to maintain adequate internal TFS controls and cooperate with supervisory authorities to promptly address weaknesses.

CONCLUSION

The Kingdom of Bahrain continues to translate its national resolve into tangible action by implementing effective and transparent measures to combat terrorism, its financing, and the proliferation of weapons of mass destruction.

Through its legislative framework and coordinated institutional mechanisms, the Kingdom ensures timely implementation of targeted financial sanctions adopted under United Nations Security Council resolutions. These measures safeguard national security, protect the integrity of the financial system, and support Bahrain’s binding international obligations.

All competent authorities, supervisory bodies, and entities subject to sanctions obligations must ensure full and continuous compliance with the measures set out in this Advisory. Implementation must be carried out without delay and in accordance with applicable national laws and decisions. The Kingdom of Bahrain remains fully committed to safeguarding the integrity of its financial system and upholding its obligations under the Charter of the United Nations and relevant Security Council resolutions.

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

Email: CTcommittee@interior.gov.bh

This Advisory is issued for public guidance. It does not replace or supersede any legal or regulatory obligation contained in Bahrain’s AML/CFT/CPF legislation or related decisions.

