



**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**

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## EXECUTIVE SUMMARY

The Advisory on the Implementation of Targeted Financial Sanctions in the Kingdom of Bahrain provides the operational framework for fulfilling the Kingdom's obligations under United Nations Security Council Resolutions related to terrorism, terrorist financing, and proliferation financing. It consolidates national procedures established in line with the relevant AML/CFT/CPF laws, regulations, and decisions, and clarifies the responsibilities of competent authorities, supervisory bodies, and regulated entities.

The Secretariat of the Committee for Combating Extremism, Terrorism and its Financing and Money Laundering serves as the central coordinating authority, ensuring that designations, amendments, delisting, and humanitarian exemptions are implemented within 24 hours of notification through a secure electronic system. The Advisory embodies Bahrain's commitment to transparency, proportionality, and accountability while reinforcing cooperation among national institutions, regional partners, and the international community.

By aligning with the National AML/CFT/CPF Strategy (2025–2027) and the National Risk Assessment, the Kingdom ensures that its targeted financial-sanctions regime remains risk-based, responsive to emerging threats, and fully consistent with international standards established by the Financial Action Task Force (FATF).

# INTRODUCTION

The Kingdom of Bahrain reaffirms its steadfast and enduring 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 pursued a comprehensive and principled approach to combating terrorism and its financing, unifying the efforts of its national institutions and strengthening cooperation with regional and international partners to protect societies from the threats of violence, extremism, and radical ideologies. This firm national stance reflects the Kingdom’s unequivocal rejection of all forms of terrorism, regardless of its causes, motives, advocates, or funders, and underscores Bahrain’s determination to work actively with brotherly nations in the region and the international community to deter and eliminate this danger.

The Kingdom will continue to contribute decisively and effectively to the global effort to combat extremism and terrorism in all their forms and to eliminate the sources of their financing through full compliance with international obligations and active participation in regional and international arrangements dedicated to countering the financing of terrorism.

These efforts are carried out within the normative framework established by the United Nations Security Council through its series of binding resolutions, demonstrating Bahrain’s commitment to the principles of cooperation, legitimacy, and shared responsibility. In fulfilment of this vision, the Kingdom of Bahrain, as a Member State of the United Nations, bears binding obligations to implement all United Nations Security Council Resolutions adopted under Chapter VII of the Charter of the United Nations.

These obligations form an essential part of Bahrain’s contribution to upholding international peace and security and maintaining the integrity of the global financial system. The Kingdom continues to strengthen its legal and institutional framework to prevent the misuse of financial systems for terrorist or proliferation-related purposes, ensuring that national measures remain consistent with international law and the principles of transparency and accountability. These national efforts are implemented in coherence with the Kingdom’s National Risk Assessment

(NRA) and the National AML/CFT/CPF Strategy (2025-2027), ensuring that Bahrain’s targeted financial sanctions framework remains risk-based, proportionate, and aligned with identified national and international priorities.

Recognising the evolving nature of terrorist financing and proliferation-financing risks, including the misuse of cross-border trade, corporate structures, and digital assets, Bahrain ensures that its targeted financial sanctions framework remains operationally responsive and risk-informed. Bahrain is equally committed to the effective implementation of the international Anti-Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing standards, including those established by the Financial Action Task Force. These requirements are central to denying terrorists, extremist financiers, and proliferators the ability to access or misuse financial and economic resources, and they reinforce Bahrain’s continued efforts to maintain a secure, stable, and resilient financial system.

Accordingly, the advisory outlines the national framework, coordination mechanisms, and procedural guidance for implementing Targeted Financial Sanctions within the Kingdom of Bahrain. It translates Bahrain’s national directives and international commitments into an operational mechanism that ensures all relevant United Nations Security Council Resolutions related to terrorism, terrorist financing, and proliferation financing are implemented promptly, effectively, and transparently.

The advisory applies to competent authorities, including ministries, regulatory bodies, and law enforcement agencies; supervisory authorities overseeing the financial and non-financial sectors; and financial institutions and designated non-financial businesses and professions that bear primary responsibility for frontline implementation.

Through these measures, the Kingdom of Bahrain reaffirms its determination to safeguard national security, preserve the integrity of its financial system, and contribute actively to international peace and stability. This advisory therefore stands as both a procedural guide and a reflection of His Majesty the King’s vision, which is rooted in justice, cooperation, and the collective defence of humanity against terrorism and its financing.

# 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                      | 17 |
| 6. Domestic Measures for Unfreezing and Humanitarian Access       | 19 |
| 7. Criteria for Designations                                      | 21 |
| 8. National Compliance Architecture and Oversight Framework       | 23 |



## 1. LEGAL FRAMEWORK

The implementation of Targeted Financial Sanctions (TFS) in the Kingdom of Bahrain is based on the relevant national AML/CFT/CPF laws, decrees, and decisions, as well as binding international obligations under United Nations Security Council Resolutions.

### National Legislative and Executive Instruments

- 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.
- 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.
- 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.
- 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.

- 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.
- Ministerial Decision No. (14) of 2023 which establishes the national mechanism for the implementation of United Nations Security Council resolutions and national terrorism listings in accordance with relevant United Nations Security Council obligations and applicable FATF standards. 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 mandating clear, immediate, and standardised implementation steps that meet the international requirements for targeted financial sanctions..

### United Nations Security Council Resolutions

Under Article 10(7) of Decree-Law 29 of 2020, Bahrain is legally bound to implement all relevant UNSCRs without delay, including:

- 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 successors.

- Proliferation of Weapons of Mass Destruction: 1718 (2006) and all subsequent DPRK resolutions (1874, 2087, 2094, 2270, 2321, 2356, 2371, 2375, 2397 and successors); 2231 (2015) on Iran; and 2664 (2022) establishing humanitarian exemptions.

These obligations are implemented through the

national mechanism established by Ministerial Decision No. (14) of 2023, which applies to all United Nations Security Council resolutions relating to terrorism and proliferation financing and ensures the circulation, acknowledgment, and execution of these decisions without delay across all competent authorities.

The following sections provide guidance for financial institutions, DNFBPs, and competent authorities to ensure prompt implementation of all UN sanctions designations and amendments.

## 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 and regulated entities 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 all competent authorities, supervisory bodies, financial institutions (FIs), and designated non-financial businesses and professions (DNFBPs) through the secure electronic platform.
- The circular includes:
  - the official UN notice and annexes;
  - identifying data of the listed person or entity; and
  - instructions to implement freezing measures without prior notice and without delay.



- All recipients must acknowledge receipt through the Secretariat's electronic system.
- Acknowledgment records form part of the national audit trail used to verify timely implementation.

### Immediate Implementation of Freezing Measures

- Upon notification, each competent authority, FI, and DNFBP 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

- Every competent authority, FI, and DNFBP must report to the Secretariat within 24 hours:
  - 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.
- Reports must be submitted through the secure electronic platform.
- Entities must take reasonable measures to verify potential matches before submission to reduce both false positives and false negatives

### Follow-Up on Positive Matches

- The Secretariat verifies the accuracy, completeness, and authenticity of all information received from competent authorities, financial institutions, or DNFBPs concerning potential matches to designated persons or entities.
- Upon confirmation, the Secretariat prepares a consolidated verification report detailing the assets identified, the implementing authority, and the status of the targeted financial sanctions.
- The Secretariat notifies the Ministry of Foreign Affairs (MOFA) of each confirmed match and submits the verification report for official communication to the 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 UN Sanctions Committee without delay that the freezing action has been implemented in accordance with the applicable Security Council Resolution.
- All correspondence, confirmations, and supporting documentation are recorded in the Secretariat's centralised sanctions database to maintain a complete audit trail for supervision, national review, and international evaluation.
- Competent authorities must conduct follow-up inquiries where necessary to determine whether additional assets, accounts, or related parties require freezing under the same designation.
- Any inconsistencies, errors, or issues identified during verification must be escalated to the originating authority for immediate correction and re-submission.
- The Secretariat monitors the timeliness and quality of follow-up responses to ensure that implementation remains consistent with national obligations to act without delay.

### Implementation of Delistings

- Delisting communications issued by the United Nations Security Council or its Sanctions Committees are automatically reflected on the Committee's website and circulated to competent authorities,

supervisory bodies, financial institutions (FIs), and DNFBPs through the secure electronic platform.

- All competent authorities, FIs, and DNFBPs must immediately lift freezing measures, unblock or release assets, and cease any restrictions imposed solely on the basis of the prior designation.
- Regulated entities must update internal screening systems to reflect the delisting and must submit confirmation of unfreezing actions to the Secretariat within 24 hours.
- The Secretariat records acknowledgments and unfreezing confirmations in the national sanctions database to maintain a complete audit trail.
- Any issues impeding the release of assets or removal of restrictions must be escalated to the Secretariat for guidance.

### Publication of Updated Lists

- The Secretariat publishes every new UN designation, amendments, or delisting on the Committee's website, in parallel with the Legal and Opinion Commission's publication in the Official Gazette, pursuant to Article 20 of Cabinet Decision No. 12 of 2021.
- Competent authorities and regulated entities must synchronize their internal databases and screening systems accordingly.
- The Secretariat must update the online sanctions lists immediately upon publication and remove outdated entries to prevent screening errors.
- All competent authorities, financial institutions, and DNFBPs must confirm completion of internal system updates through the secure electronic platform.
- The Secretariat retains a timestamped record of each publication update to support verification, tracking, and national audit requirements.

### Verification Keeping and Record

- The Secretariat compiles all confirmations, acknowledgments, and implementation reports into a comprehensive verification dossier for each United Nations Security Council (UNSC) communication

relating to designations, amendments, delistings, or exemptions under targeted financial sanctions (TFS) regimes.

- Each verification dossier includes:
  - o the authenticated UN notification and any accompanying annexes;
  - o a time-stamped record of national dissemination, receipt, and acknowledgment by competent authorities, financial institutions (FIs), and designated non-financial businesses and professions (DNFBPs); and
  - o documentary evidence of implementation demonstrating that the funds or other assets of the designated persons or entities have been identified, frozen, and reported without delay.
- All records are secured, indexed, and retained within the Secretariat's centralised TFS compliance database to ensure a verifiable audit trail consistent with FATF requirements for transparency, traceability, and accountability.
- The verification dossiers are maintained for a minimum of five years and are accessible for supervisory inspection, domestic inter-agency review, mutual evaluation, and international cooperation purposes, as required under the Kingdom's AML/CFT/CPF legal and regulatory framework.
- The Secretariat must ensure that all data entries associated with each dossier are complete, consistent, and time-stamped to support accurate supervisory and audit processes.
- Any discrepancies or missing information identified during compilation must be escalated to the originating authority for immediate correction and re-submission.
- The Secretariat must generate periodic summary reports on verification outcomes to support national oversight and demonstrate consistent implementation across all obligated entities.



## 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 explains the channels through which a delisting petition may be submitted, the required information and documentation, and the role of the Secretariat in forwarding requests through the appropriate official pathways. These procedures apply to all persons and entities listed under the ISIL (Da'esh) & Al-Qaida Sanctions List and any other UN sanctions list that provides for petitions by listed parties..

### Submission of Delisting Requests Through the Secretariat

- Listed individuals or entities may seek delisting under relevant United Nations Security Council resolutions. Requests may be submitted through the Secretariat, which forwards them to the United Nations via the appropriate official channels, or directly to the UN Office of the Ombudsperson, which handles delisting petitions for individuals and entities listed under the ISIL (Da'esh) & Al-Qaida Sanctions List.
- Petitioners submitting a delisting request through the Secretariat must include:
  - o a clear explanation of why the listing criteria no longer apply;
  - o any change in circumstances, activities, or associations;
  - o up-to-date identifying information (including aliases and new identifiers);
  - o supporting documentation demonstrating that the basis for the original listing is no longer relevant or was applied in error;
  - o for deceased individuals: an official death certificate or similar documentation, and

where applicable, information on legal beneficiaries or joint owners of assets.

- Upon receiving a delisting request, the Secretariat:
  - o records the request in the national sanctions system;
  - o acknowledges receipt to the petitioner;
  - o forwards the request to the appropriate UN mechanism, in coordination with the Ministry of Foreign Affairs where required;
  - o maintains an audit record of the request and any subsequent correspondence.

### Submitting a Delisting Request 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](mailto: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.

### Delisting Requests Submitted Through a Member State

- A petitioner may request that the State of nationality or residence submit the delisting petition on their behalf.
- In such cases, the request must be submitted to the Secretariat for coordination with the Ministry of Foreign Affairs, which may transmit the request to the UN Sanctions Committee in accordance with established diplomatic procedures.

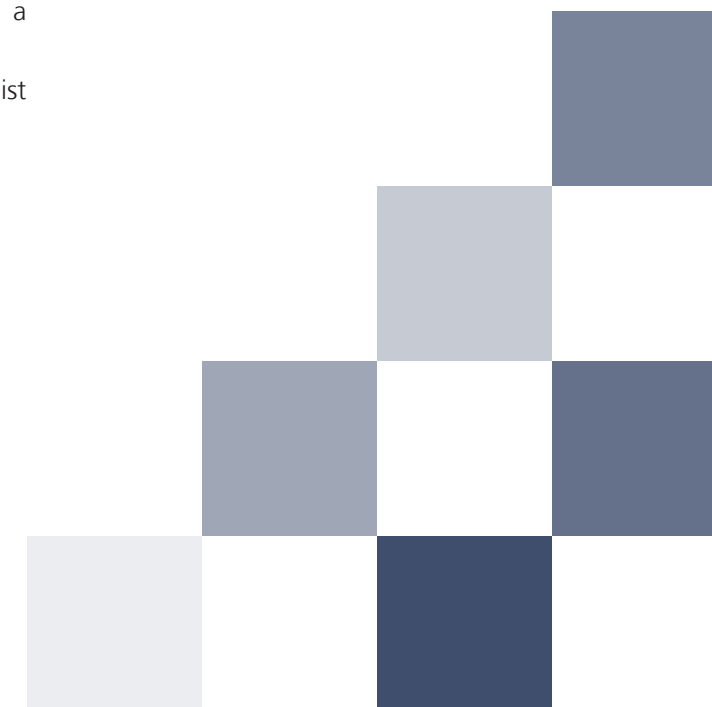
### Processing of Delisting Requests and UN Decision-Making

- Once transmitted, delisting requests are considered under UN procedures applicable to the relevant sanctions regime.
- The Secretariat maintains records of all delisting requests and their outcomes in the national sanctions database.
- Regulated entities must continue to implement all freezing measures until an official UN delisting decision is issued and reflected through the national communication platform.
- If the UN Sanctions Committee approves a delisting:
  - o the Secretariat will circulate the updated list without delay;

- o all competent authorities, FIs, and DNFBPs must immediately unfreeze funds or other assets;
- o all internal screening systems must be updated promptly;
- o confirmations of unfreezing actions must be submitted within 24 hours.

### Delisting Requests Submitted Through a Member State

- A petitioner may request that the State of nationality or residence submit the delisting petition on their behalf.
- In such cases, the request must be submitted to the Secretariat for coordination with the Ministry of Foreign Affairs, which may transmit the request to the UN Sanctions Committee in accordance with established diplomatic procedures.



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

### Purpose

This section outlines Bahrain's national mechanism for implementing targeted financial sanctions and activity-based prohibitions related to the proliferation of weapons of mass destruction and their financing. These measures stem from United Nations Security Council Resolution 1718 of 2006 and its successor resolutions on the DPRK, Resolution 2231 of 2015 on Iran, and the broader obligations set out in Resolution 1540 of 2004. Bahrain gives effect to these resolutions immediately upon receipt of official United Nations communications and in accordance with Ministerial Decision No. (14) of 2023, which establishes the national process for circulating, acknowledging, and implementing Security Council resolutions. These measures support Bahrain's obligations under relevant United Nations Security Council Resolutions and applicable international AML/CFT standards.

### Receipt and Classification of Notifications

- The Secretariat receives DPRK- and Iran-related UNSCR notifications directly from the United Nations Security Council or its Sanctions Committees.
- Each communication is authenticated and recorded electronically with a time stamp.
- The Secretariat classifies each notification as a listing, amendment, or delisting.
- The Secretariat initiates internal processing immediately to ensure implementation without delay and to prevent movement or concealment of assets linked to designated persons or entities.

### Circulation to Competent Authorities

- Within 24 hours of receipt, the Secretariat circulates all UNSCR communications and annexes to competent authorities, supervisory bodies,

financial institutions (FIs), and designated non-financial businesses and professions (DNFBPs) through the secure electronic coordination platform.

- Circulation includes identifying information and instructions for immediate implementation.
- All recipients must acknowledge receipt electronically.
- Acknowledgment records are retained as part of the national audit trail.

### Reporting and UN Notification Chain

- All competent authorities, financial institutions (FIs), and DNFBPs must report all confirmed matches, interdictions, asset freezes, or enforcement actions to the Secretariat within 24 hours of detection.
- Reports must also include any attempted, rejected, aborted, or suspended transactions displaying proliferation-financing indicators, sanctions-evasion typologies, or links to prohibited activities.
- All entities must include supporting documentation such as transaction details, routing data, shipping documents, ownership information, and risk indicators to enable accurate verification and escalation.
- The Secretariat verifies the accuracy, completeness, and timeliness of every submission and prepares a consolidated verification dossier summarizing the actions taken, assets affected, and authorities involved.
- Where inconsistencies or incomplete submissions are identified, the Secretariat must return the file to the originating entity for immediate correction and re-submission.
- The Secretariat informs the Ministry of Foreign Affairs (MOFA) of each confirmed action 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, notifies the UN Sanctions Committee without delay that the targeted financial-sanctions measures have been implemented.
- All communications, supporting documentation, and verification materials are recorded, indexed, and securely retained by the Secretariat to maintain a complete audit trail accessible for domestic supervisory inspection and international cooperation.
- The Secretariat must maintain a time-stamped record of each UN communication transmitted, actions taken, and notifications sent to ensure traceability and compliance with national obligations.

### Immediate Implementation of Targeted Financial Sanctions

- Financial institutions and DNFBPs must screen all customers, beneficial owners, transactions, trade instruments, payment messages, vessels, and business relationships against updated WMD-related sanctions lists immediately upon circulation.
- Entities must immediately freeze any funds or economic resources owned or controlled, directly or indirectly, by designated persons or entities, and must prevent any movement, transfer, conversion, or use of such assets prior to public notification.
- Entities must report freezing actions to the Secretariat within 24 hours, including:
  - o confirmation of screening;
  - o a full description of each frozen asset, its value, and location;
  - o a nil return when no match is identified.
- Entities must document and reject any prohibited or suspicious transaction involving proliferation programmes, dual-use items, deceptive shipping practices, or sanctions-evasion typologies, and must record each rejection action.
- Banks, subsidiaries, and correspondent institutions must apply enhanced vigilance when dealing with customers or institutions linked to the DPRK or Iran, including monitoring for high-risk corridors,

third-country payment chains, or unusual routing.

- Correspondent-banking relationships that present proliferation-financing risk must be restricted, suspended, or terminated, and such actions must be reported to the Secretariat.
- Public financial support, export credits, guarantees, or insurance must not be issued for any trade or investment linked to sanctioned programmes, sectors, or entities, in accordance with relevant UNSCR provisions.
- Entities must review historical transactions where appropriate to identify prior dealings with designated persons or entities or proliferation-related activities.

### Publication and System Updates

- The Secretariat publishes all WMD-related listings, amendments, and delistings on the Committee's website in parallel with the Legal and Opinion Commission's publication in the Official Gazette, pursuant to Article 20 of Cabinet Decision No. (12) of 2021.
- All competent authorities, supervisory bodies, financial institutions (FIs), and DNFBPs must update internal screening systems and compliance databases immediately upon publication.
- The Secretariat must update online sanctions lists immediately upon receipt of UN communications and remove outdated versions to prevent screening failures or false negatives.
- All competent authorities, FIs, and DNFBPs must confirm completion of internal system updates and database synchronisation through the secure electronic platform.
- The Secretariat must maintain a time-stamped log of every publication, update, correction, or withdrawal of sanctions-related content to ensure transparency, traceability, and auditability.
- Any discrepancies found in published sanctions lists, including errors in names, aliases, identifiers, or references, must be escalated immediately to the Secretariat for correction and re-circulation.
- Entities must ensure that any third-party screening vendors, automated systems, or external compliance tools are updated simultaneously to avoid operational inconsistencies.

## Activity-Based Financial Prohibitions

- Institutions must not finance, insure, underwrite, or facilitate the supply, sale, transfer, manufacture, maintenance, or use of items, materials, equipment, goods, or technology prohibited under UNSCRs 1718 and 2231.
- Entities must reject or return any transaction involving such prohibited activities and must document each rejection.
- Financial institutions must apply enhanced scrutiny to customers, transactions, or counterparties linked to DPRK or Iran, including those involving dual-use goods, front companies, opaque ownership structures, unexplained intermediaries, or high-risk jurisdictions.
- Correspondent-banking relationships presenting proliferation-financing risk must be restricted, suspended, or terminated, and such actions must be reported to the Secretariat.

## Trade and Customs Enforcement

- Customs, port, and aviation authorities enforce all import, export, and transit bans on WMD-related goods, materials, technology, and services under applicable UNSCRs.
- High-risk cargo must be inspected, intercepted, or denied entry, and all interdictions must be reported to the Secretariat within 24 hours.
- Authorities must prevent financing, insurance, brokering, shipping, or any facilitation of transactions involving prohibited or proliferation-sensitive items, even when the counterparty is not designated.
- Catch-all financial and trade controls must be applied immediately to any suspicious dual-use items pending Secretariat instruction.

## Maritime and Aviation Controls

- Deny port entry, refuelling, trans-shipment, maintenance, or docking services to vessels engaged in prohibited activities or sanctions-evasion practices, and report such denials to the Secretariat within 24 hours.

- Verify vessel documentation, cargo declarations, manifests, and routing information to detect inconsistencies or risk indicators of DPRK or Iran sanctions evasion.
- In aviation, prohibit the carriage, refuelling, trans-shipment, or facilitation of cargo linked to prohibited WMD-related items or designated persons or entities, and report all detections to the Secretariat without delay.
- Inspect aircraft, air cargo, courier shipments, and supporting documentation when proliferation-sensitive indicators, dual-use materials, or misdeclared goods are detected.
- Cooperate with regional maritime, port, aviation, intelligence, and enforcement authorities to exchange information on sanctioned vessels, aircraft, beneficial owners, routes, and evasion typologies.
- Maintain records of all interdictions, denials of service, inspections, and cross-agency communications to ensure a verifiable audit trail and support supervisory review, international cooperation, and UNSCR reporting obligations.
- Escalate immediately to the Secretariat any case involving high-risk routing patterns, off-manifest cargo, or coordination with front companies, maritime intermediaries, or aviation facilitators linked to sanctioned actors.

## Proliferation-Financing and Sanctions-Evasion Indicators

- Potential indicators of proliferation-financing or sanctions-evasion activity include:
  - Ship-to-ship transfers or AIS blackouts near known rendezvous zones.
  - Dual-use goods described under generic or misleading customs codes.
  - Circular trade routes, third-country payment chains, or unexplained intermediaries.
  - Recently formed or dormant companies with opaque ownership or inconsistent business profiles.
  - Repeated small-value payments structured to evade detection thresholds.

- Required Actions
  - Entities must immediately escalate any detected indicator to the Secretariat and relevant competent authorities for coordinated analysis and action.
  - All escalated cases must include supporting documentation such as trade documents, routing data, payment details, ownership information, and other relevant material to enable rapid verification.
  - Entities must document all detection events, potential matches, and escalations in their internal record-keeping systems for supervisory inspection and follow-up.

## Corporate and DNFBP Responsibilities

- Trust and company service providers (TCSPs) must conduct beneficial-ownership due diligence on all customers and refuse incorporation, nominee, management, or administrative services involving designated persons, entities, or front companies linked to DPRK or Iran.
- TCSPs must identify and report to their supervisory authority any attempted or completed activity involving complex ownership structures, shell companies, or arrangements intended to conceal the involvement of sanctioned actors or proliferation-sensitive goods.
- Real-estate agents, lawyers, accountants, dealers in precious metals and stones, and other DNFBPs must screen all customers, beneficial owners, and transactions against the UN and national WMD-related sanctions lists.
- DNFBPs must immediately freeze any funds, assets, or economic resources owned or controlled, directly or indirectly, by designated persons or entities and

must submit an implementation report through their supervisory authority within 24 hours.

- DNFBPs must reject, terminate, or not proceed with any transaction, service, legal arrangement, or corporate formation that could directly or indirectly contribute to prohibited WMD-related procurement, financing, or supply chains.
- All DNFBPs must report both confirmed and attempted proliferation-financing activities, including the use of front companies, nominee directors, informal transfer networks, misdeclared goods, or unexplained intermediaries.
- DNFBPs must maintain time-stamped records of screenings, escalations, freezes, refusals of service, and communications with supervisory authorities for a minimum of five years.
- Where red-flag indicators or dual-use concerns arise, DNFBPs must escalate the case immediately to their supervisory authority for instruction, and the supervisory authority must notify the Secretariat without delay.



## Licensing and Prohibited Services

- No license, authorization, approval, insurance, brokerage, maintenance, or financial service may be granted, issued, or otherwise provided if it directly or indirectly facilitates any programme, activity, person, or entity subject to WMD-related targeted financial sanctions under the relevant UNSCRs.
- Competent authorities must refuse or withdraw any application for a license or service that involves, supports, or could reasonably contribute to prohibited WMD-related items, dual-use goods, transport, technology, or services, whether or not the counterparty is designated.
- All entities must suspend or decline any transaction, shipment, payment, service request, technical assistance, maintenance activity, or financing arrangement when the purpose, end-user, routing, or documentation indicates potential links to proliferation-sensitive activities.
- Any ambiguous, incomplete, or potentially facilitative case must be referred to the Secretariat for binding instruction to ensure uniform implementation of sanctions obligations.
- Entities must immediately halt any continuing service or contractual arrangement upon identification of proliferation-financing indicators and must notify their supervisory authority and the Secretariat within 24 hours.
- Public financial support, export credits, guarantees, or insurance must not be issued for any trade or investment linked to sanctioned programmes, sectors, or entities, in line with obligations under UNSCR 1874 and UNSCR 1929.

## Record-Keeping, Verification, and Cooperation

- Every competent authority, financial institution (FI), and DNFBP must maintain time-stamped records of all screenings, interdictions, freezes, denials of service, escalations, and related communications for inspection and audit.
- The Secretariat consolidates verification reports for each UNSCR notification, including information on assets frozen, interdictions, refusals of service,

and enforcement measures taken by competent authorities, FIs, and DNFBPs.

- The Secretariat briefs the Committee Chair on the verification outcome and ensures that all follow-up actions required under national or international obligations are initiated without delay.
- Entities must retain all records related to proliferation-financing risks, attempted transactions, typologies, red flags, and suspicious activity to support ongoing supervision and operational risk assessment.
- Competent authorities, customs, maritime, financial, intelligence, and supervisory bodies must cooperate continuously to identify and disrupt sanctions-evasion networks, cross-border procurement channels, and front-company structures.
- Information relevant to proliferation-financing typologies, red-flag indicators, high-risk jurisdictions, evasion patterns, bulk-cash movements, and deceptive shipping or aviation practices must be shared promptly among domestic authorities.
- Where appropriate, information must be shared with international partners to support coordinated enforcement, interdiction, and denial actions consistent with UNSCR obligations.
- All records must be retained for a minimum of five years and be readily accessible for supervisory inspection, national review, mutual evaluations, and international cooperation.

## 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:
  - o the Secretariat;
  - o competent national authorities, including law-enforcement, intelligence, supervisory, or regulatory bodies; or
  - o 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:
  - o committed, attempted, participated in, or facilitated a terrorist act;

- o provided or collected funds or other resources for terrorist acts or organizations; or
- o 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:
  - o full identifying information (names, aliases, DOB/POB, nationality, passport/ID numbers, addresses, business registrations, financial identifiers);
  - o a factual narrative linking the individual or entity to terrorist activity or terrorist financing;
  - o supporting intelligence, law-enforcement, security, supervisory, or judicial information;
  - o an assessment confirming that the case meets the criteria under Articles 2–8 of Cabinet Decision No. (12) of 2021.
- The Secretariat must:
  - o verify the reliability, credibility, and source of information;
  - o ensure completeness and sufficiency to meet national evidentiary standards;
  - o coordinate with domestic and foreign authorities through MOFA where needed;
  - o 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, supervisory bodies, FIs, and DNFBPs through the secure electronic platform in accordance with Ministerial Decision No. (14) of 2023.
- All entities must implement freezing actions within hours and not exceeding 24 hours, consistent with Decree-Law No. (29) of 2020 and FATF Recommendation 6 (“without delay”).

### 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:
  - o the fact and consequences of designation;
  - o available review and delisting mechanisms;
  - o relevant government contact points.

### Implementation and Reporting

- Competent authorities, FIs, and DNFBPs must:
  - o screen customers, transactions, and beneficial ownership records against the updated list;
  - o freeze all funds or assets owned or controlled, directly or indirectly, by listed persons or entities;
  - o ensure no funds, assets, or economic resources are made available to them;
  - o 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:
  - o 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:
  - o the amount requested and intended purpose;
  - o whether it relates to basic expenses (food, rent, medical care, utilities, legal fees) or extraordinary expenses (contractual obligations or other exceptional needs); and
  - o 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 registry.
- The Secretariat confirms that all mandatory fields and documentation are complete.
- 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 (e.g., Central Bank of Bahrain, Ministry of Justice, Financial Intelligence National Center).
- The assessment determines:
  - o that the funds requested fall within the basic or extraordinary expense categories set out in Decision 12 (2021);
  - o that the purpose does not contravene national law or international obligations; and
  - o that no portion of the funds could reasonably be used for terrorist or proliferation activities.
- A written Assessment Summary is prepared for Committee review.

### Committee Deliberation and Approval

- The Secretariat submits the Assessment Summary and full file to the Committee for Combating Extremism, Terrorism and its Financing and Money Laundering.
- If approved, the Secretariat issues a written authorization to the concerned financial institution or DNFBP permitting controlled release of funds for the approved purpose only.
- Where the request involves a UN-listed person or entity, the Secretariat coordinates with the Ministry of Foreign Affairs (MOFA), which forwards the request through the Permanent Mission of the Kingdom of Bahrain to the United Nations in New York to the relevant UN Sanctions Committee.
- Implementation occurs only after a no-objection or explicit approval is received from the UN Committee.

## Execution and Monitoring

- Upon authorization, the financial institution or DNFBP must release the funds without delay (within 24 hours) and confirm execution to the Secretariat.
- Confirmation reports must state the exact amount disbursed, beneficiary name, date, and purpose.
- The Secretariat monitors all disbursements to ensure compliance with approved terms.
- If any misuse or non-compliance is detected, the Secretariat orders an immediate refreezing of remaining assets and notifies the competent authorities.

## Reporting and Record Keeping

- The Secretariat creates a Humanitarian Access Register documenting all requests, authorizations, disbursements, and follow-up actions.
- Each entry contains:
  - o applicant identifiers and case reference number;
  - o amount and purpose authorized;
  - o supporting documents; and
  - o verification of fund use from the relevant institution.
- This process enables ongoing oversight, promotes continuous improvement, and ensures that implementation across all entities remains timely and effective.

## Transparency and Public Information

- The Committee's official website provides clear instructions, forms, and contact details for submitting requests for humanitarian or basic-expense access, consistent with UNSCR 2664 (2022).
- Guidance includes examples of eligible expenses and the required documentation.
- Personal data of applicants and beneficiaries remain confidential and are not published.

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

In accordance with United Nations Security Council Resolution 2664 (2022), humanitarian activities carried out by eligible humanitarian actors are not subject to asset-freeze prohibitions under any UN sanctions regime. This carve-out applies to all UN-designated persons and entities, including those subject to terrorism- and proliferation-related sanctions.

- Requests involving humanitarian operations may be submitted through the Secretariat.
- Upon receipt, the Secretariat coordinates with the Ministry of Foreign Affairs to transmit the request to the United Nations, where required, for no-objection or approval in line with UN procedures.
- Once authorization is confirmed, financial institutions and DNFBPs must release the approved funds or other assets within 24 hours and submit a written execution report to the Secretariat, including the amount released, the beneficiary, and the authorized purpose.
- The Secretariat maintains records of all humanitarian-related authorizations and disbursements to ensure transparency, proportionality, and consistency with national legislation and United Nations guidance.
- Guidance on eligible humanitarian organizations, permissible humanitarian activities, and reporting obligations is updated when the United Nations or national authorities issue new instructions requiring such changes.

# 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:

- All proposals submitted by the Secretariat, competent authorities, or partner states seeking to designate individuals or entities on the National Terrorist List.
- All assessments of foreign or international requests under UNSCR 1373 and other relevant UNSCRs for domestic implementation.
- 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.
- Designation under this framework constitutes an administrative preventive measure based on the applicable evidentiary threshold and does not require a prior criminal conviction. The objective of designation is to prevent the misuse of funds or other assets for terrorist purposes while respecting applicable procedural safeguards under national law.
- 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 and regulated entities;
  - 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 performance 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, supervisory bodies, financial institutions, and DNFBPs 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;
  - o generates time-stamped audit records of all implementation actions.
- Competent authorities, supervisory authorities, FIs, and DNFBPs must use the platform to:
  - o receive sanctions notifications;
  - o submit acknowledgments and implementation reports;
  - o meet reporting deadlines;
  - o upload required supporting documentation.
- Platform access is role-based and restricted to authorized users.
- The system supports real-time monitoring and the production of national compliance dashboards 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:
  - promptly disseminate Secretariat notifications within their institution;
  - ensure immediate operational implementation of all sanctions-related instructions;
  - 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 through structured review of information submitted by competent authorities and regulated entities.
- Verification reviews assess:
  - timeliness and completeness of freezing, unfreezing, and reporting actions;
  - quality and accuracy of responses;
  - adequacy of internal screening systems, sanctions-filtering tools, and control mechanisms across institutions;
  - effectiveness of escalation procedures and internal decision-making processes related to potential matches and sanctions-evasion indicators.
- Monthly, quarterly, and annual verification summaries outline:
  - sanctions communications received;
  - implementation actions taken;
  - delays or non-compliance;
  - corrective measures recommended.
- Consolidated national statistics and supervisory findings are formally reported to the National AML/CFT Committee to support performance analysis, risk assessment, and evaluation of TFS

effectiveness.

- The Secretariat provides feedback to competent authorities and supervisory bodies on reporting quality and timeliness.
- Where deficiencies are identified, supervisory authorities initiate corrective actions, which may include enhanced monitoring, thematic inspections, remedial directives, or enforcement measures in accordance with applicable legislation.
- Where appropriate, aggregated findings, such as the number of positive matches, implementation timelines, and supervisory outcomes, may be reflected in national reporting to support transparency and demonstrate TFS effectiveness.

### Transparency and Public Communication

- The Committee's official website serves as the national public portal for sanctions-related information.
- The website provides access to:
  - updated national and UN sanctions lists;
  - procedures for listing, delisting, and humanitarian-access requests;
  - relevant forms and contact points;
  - 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:
  - identify and record breaches;
  - notify the Secretariat of any non-compliance detected within their jurisdiction; and
  - take administrative or criminal action, as appropriate.
- Sanctions for non-compliance include:
  - administrative fines up to BHD 50,000 under Article 2 bis of Decree-Law 29 (2020);
  - criminal penalties for wilful obstruction or delay under Article 3 (6-3) of Decree-Law 4 (2001);
  - regulatory actions such as warnings, license suspension, or withdrawal for repeated violations.
- The Secretariat maintains a compliance-breach register summarizing breaches and subsequent enforcement actions.
- Regulated entities are expected to maintain adequate internal TFS controls and cooperate with supervisory authorities to promptly address weaknesses.

### Continuous Improvement

- The Secretariat implements a structured performance-review cycle to enhance Bahrain's TFS effectiveness.
- Performance indicators include:
  - implementation timeliness;
  - accuracy and quality of reporting;
  - levels of inter-agency coordination.
- Review findings inform:
  - updates to operational procedures;
  - targeted capacity-building initiatives;

- Review findings are provided to the National Policy Committee for AML/CFT to support strategic alignment and ensure consistency between TFS implementation and national AML/CFT priorities.

- This continuous improvement process helps ensure that Bahrain's TFS system remains responsive to evolving threats and consistent with international standards.

### Integration with the National Framework

- This Advisory aligns with Bahrain's National Risk Assessment and the National AML/CFT Strategy (2025–2027).
- Relevant findings from sectoral risk assessments, supervisory reviews, and national coordination mechanisms are incorporated into updates of this Advisory and its related guidance.
- This integration supports risk-based implementation of TFS measures and ensures alignment with national priorities and Bahrain's international obligations.

# 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 a strong legislative framework, coordinated institutional mechanisms, and sustained international cooperation, the Kingdom ensures that these measures remain consistent with global standards and best practices. Under the guidance of national leadership, Bahrain’s institutions will continue to strengthen the integrity of the financial system, promote accountability, and prevent the misuse of financial channels for illicit purposes.

These national efforts are guided by the conviction that security and stability depend on constant vigilance, respect for the rule of law, and cooperation among nations committed to peace and human dignity. By maintaining these measures, the Kingdom reaffirms its role as an active and responsible partner in the international community and its determination to contribute to global efforts aimed at eliminating the root causes of terrorism and extremism.

Bahrain’s continuing work in this field reflects not only adherence to its international obligations but also a firm belief that protecting societies from the threat of terrorism is a moral, legal, and collective responsibility. All competent authorities, supervisory bodies, and regulated entities must ensure full and continuous compliance with the obligations set out in this Advisory. Implementation should be timely, coordinated, and proportionate to identified national risks, in accordance with the relevant AML/CFT/CPF laws and decisions. The Kingdom of Bahrain remains fully committed to safeguarding the integrity of its financial system and upholding its obligations under international standards.

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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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.

