



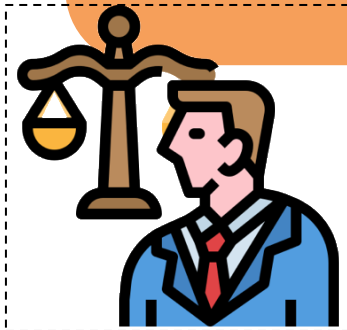
وزارة العدل والشؤون الإسلامية والأوقاف
Ministry of Justice, Islamic Affairs
and Waqf

Guidelines regarding attempt transactions in the profession of lawyers and in foreign legal consulting offices

Prohibiting and combating money laundering, terrorist financing and the illegal cross-border transfer of funds

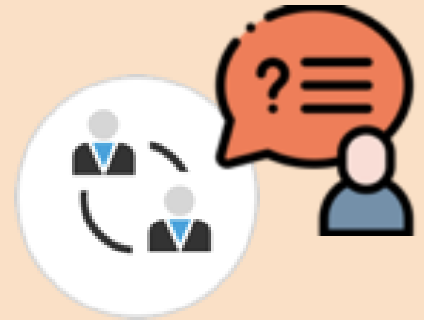
Order No. (14) of 2021

Regarding the Measures to Prohibit and Combat Money Laundering, Terrorism Financing and Illegal cross-border transfer of funds in the Profession of Lawyers and Foreign Legal Consulting Offices and the Rules related to Freezing and Unfreezing Funds, and the Prohibition of dealing with persons or entities on the Terrorist Lists



Definition of attempt transactions:

Initiating or seeking to establish any business relationship concerning legal work or submitting work of a special nature related to suspicious or unusual transactions between the lawyer or the foreign office and the client.



Examples of attempt transactions in the profession of lawyers and foreign legal consulting offices

- **When the client refuses to disclose his identity or the identity of the ultimate beneficiary.**



- **When the client - if a legal person - refuses to disclose information related to the company.**



- **When the client tries to conceal or provide inaccurate information while implementing due diligence procedures and cancels the transaction due to a reason not related to the fees.**



- **When the client conceals or provides inaccurate information related to the source of his income or wealth, or the source of the income or wealth of the ultimate beneficiary.**



- **When the client conceals or provides inaccurate data related to his job or the job of the ultimate beneficiary.**



- **When the client refuses to use the credit card for large amounts to complete the transaction.**



- **When the client provides inaccurate data and then does not complete the transaction due to a reason not related to the fees.**



- **When the client negotiates with the lawyer or the foreign office and reaches an agreement but refuses to agree with the terms and conditions and fails to complete the transaction due to a reason not related to the fees.**



When should the attempted transaction be reported?

Every compliance officer or his deputy -as the case may be- shall inform the Enforcement Unit by filling an electronic form and notify the Follow-up Unit if suspicious transactions were detected within a period not exceeding 24 hours from the time of detection or from the time of receiving such notification.



Contact Details

Follow-up Unit: gr-followup@moj.gov.bh
Enforcement Unit: str@bahrainfiu.gov.bh



What is the relationship between the Sanctions List and the National Terrorism Lists and attempt transactions?

A client that is listed on the Sanctions List or the National Terrorism Lists who seek to start a business relationship related to receiving funds is considered to be as an attempt transaction, and must be reported to the concerned entities and the lawyer or the foreign office must refrain from handing over the funds.

