



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

Obligations of Lawyers and Foreign legal consulting offices regarding the prohibition and combating of money laundering, terrorist financing and the illegal cross-border transfer of funds



Obligations of Lawyers and Foreign legal consulting offices

1. Appointment of a Compliance Officer, Deputy Compliance Officer or a Branch Compliance Officer.



2. The verification of a professional bank account that may be a single account or shared by several lawyers according to their agreement, whereby all money collected on behalf of their clients are deposited. The Follow-up Unit must be notified by filling out the designated form and sending it via e-mail. The money should only be transferred to the professional bank account, and payments may be received in cash however it shall not exceed 1000 Bahraini Dinars.



3. The data and documents of the clients must be kept for a period of 5 years from the date of the end of the legal work or work of a special nature, and it is prohibited to destroy any records related to it if it is under investigation by the competent authorities without the need to refer back to the Follow-up Unit and the Enforcement Unit.



4. Contracting with licensed audit offices to audit professional accounts if the income is more than 10 thousand Bahraini Dinars per year.



To view the list of auditing companies licensed by the Ministry of Industry, Commerce and Tourism, please click on the link below



<https://s3-eu-west-1.amazonaws.com/nbrproduserdata/media/xEsWuchHgzo4V3pZhit2zgw2FdRYwMcXxQAKrwNyw.pdf>

5. Submitting an electronic report in which all legal work or work of special nature is recorded, provided that it includes (Client data, subject of work, date of submission of work, method of payment, transfer number, bank name, transfer date) for those whose income is less than 10 thousand Bahraini Dinars per year.



6. The compliance officer or his deputy -as the case may be- shall provide the Follow-up Unit with the follow-up form and the financial report or the electronic report at the end of each year without exceeding 3 months from the end of the year.



Types of financial reports:

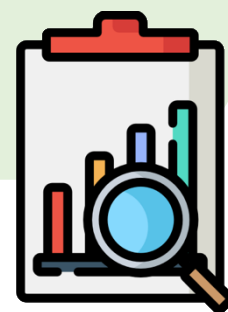
Audited: Reports that are prepared by one of the auditing offices licensed by the Ministry concerned with commerce.

It is obligatory for lawyers and foreign legal consulting offices whose annual income is more than ten thousand Bahraini Dinars.

Unaudited: It is an electronic information register in which all legal work or of a special nature provided to clients are recorded.

The register should include (client data, work subject, date of work submission, The payment of the fee method, transfer number, bank name, transfer date).

It is obligatory for lawyers and foreign legal consulting offices whose annual income is less than ten thousand Bahraini Dinars.



7. Participate whenever possible, in training programs related to combating money laundering and terrorist financing.



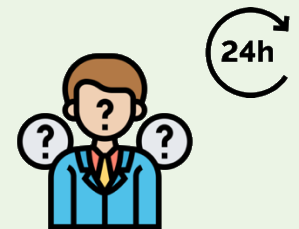
8. Update the data of the employees, lawyers and the legal advisors periodically, and notify the Follow-up Unit by filling the update form on the Ministry's website and sending it via the Follow-up Unit's e-mail.



9. Submit a disclosure form – Know Your Client – upon the request of the Enforcement Unit or the Follow-up Unit.



10. The compliance officer or his deputy -according to the case- shall inform the Enforcement Unit and notify the Follow-up Unit regarding any suspicious or unusual transactions or attempts to deal in them as soon as he detects them or receives a notification from the lawyer or the foreign legal consulting office, within a period not exceeding 24 hours from the time of detection or notification.



11. The lawyer or the foreign legal consulting office must ensure if any of their current clients names are not listed on the Sanctions List or the National Terrorism Lists and notify the Follow-up Unit if there is no match.



12. The lawyer or the foreign legal consulting office must ensure if any of their current or new clients or clients that want to conduct a new transaction names are listed on the Sanctions List or the National Terrorism Lists and report it to the Enforcement Unit and the Committee to Combat Extremism and Terrorism its financing, and money laundering and the Follow-up Unit in case of a match within 24 hours from publishing the lists.



To view the National Terrorist Lists



<https://www.legalaffairs.gov.bh/Media/LegalPDF/RNCAB0119.pdf>

To view the Sanctions List



<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>

Please subscribe to the Official Gazette to receive updates on the National Terrorism Lists and the Sanctions List



https://www.bahrain.bh/wps/portal/!ut/p/a1/IZFNT8MwDIZ_C4ce06Qf6we3HkbHNAINRazNBSUh6YLapktTyvbrSYELEts032y9fv3YhhiWEHfkQ9bESNWRZs5x9Lp6QpHnJ_46XywDtM3zYrP1N8vHlxDullaYdaY3e1hJQhy08BykhJBMkgbU5MSN4WAY6cC07GdboPIh5IOZO3sm32BFRRJST4SApF4Ewpj4gHgoBSgKoliwNE5Y

Contact Details

The Follow-up Unit: Gr-followup@moj.gov.bh

The Enforcement Unit: Str@bahrainfiu.gov.bh

