



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

**Guidelines regarding dealing with politically  
exposed persons in the profession of lawyers and  
the foreign legal consulting offices**

**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 the Funds, and the Prohibition of dealing  
with persons or entities on the Terrorist Lists**



## Who are politically exposed persons?

- Individuals working in senior positions
- Politicians
- Judges
- Clergy
- Diplomats
- Members of the legislative body
- Heads of political and charitable societies and labor unions
- Artists
- Individuals whom Law No. (32) of 2010 regarding the financial disclosure is applicable to
- Foreign politically exposed persons
- Any other politically exposed persons
- Family members and close associates of politically exposed persons

## Obligations of lawyers and foreign offices

If the client is a politically exposed figure, enhanced due diligence procedures measures shall be implemented, and the compliance officer or his deputy -as the case may be- shall be notified immediately after starting the procedures.\*



\*Normal due diligence procedures are implemented only without enhanced due diligence procedures if the legal work required is related to personal status or an employment contract, or any legal act that does not involve the transfer of funds or dealing with it.

### Enhanced due diligence procedures

#### 1- Implement normal due diligence

Oblige clients to attach documents to their power of attorney proving the following:

a) Name



b) The full address (address and place of residence)



c) Nationality



d) Occupation



e) ID card or passport details



- Fill out the know your client (KYC) form.
- Validate the information related to the identity of the client and the ultimate beneficiary.
- Record the clients data in the records approved by the Ministry.
- Update these data and documents periodically.
- Inform the Enforcement Unit and the Follow-up Unit of any suspicious data.
- Refrain from dealing with unidentified individuals or those who refuse to prove their identity.

**2- Inquire about the source of funds and the purpose of the legal work or the work of special nature requested.**



**3- Verify if the legal work or the work of a special nature requested is suitable to the nature of the clients activity.**



**4- Any other suitable procedures that is in line with the legal work.**



**5- Request the clarification of complex transactions whenever unclear.**



**6- Obtaining more data to identify the clients and the ultimate beneficiary.**

**It is permissible to rely on the approved electronic methods and means to receive identities by implementing all recommendations issued by the Financial Action Task Force (FATF) related to Digital Identity, and informing the Enforcement Unit and notifying the Follow-up Unit of any suspicious data.**



**Updating existing customers' information when conducting any new transaction since they may become a politically exposed figure.**



**Rely on the internet and social media sources to identify, monitor and check data related to the politically exposed figures after verifying its credibility.**



## Contact details

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



**Enforcement Unit: Str@bahrainfiu.gov.bh**