



CENTRALE BANK VAN ARUBA

May 22, 2012

HAND DELIVERED

To the managements of all supervised
financial institutions and trust service providers

CMB/lcw/5.5/INT/1341

Subject: Reporting form Sanctions Regulations

Dear Management,

Pursuant to the Sanctions State Ordinance 2006 (AB 2007 no. 24)¹, which became effective on April 26, 2007, rules may be laid down by State Decree containing general administrative orders for the implementation of a convention or an international resolution that Aruba is obligated to comply with, and which entail a restriction, prohibition or the imposition of an obligation for residents. In connection herewith, the Centrale Bank van Aruba (CBA) informed you by letters of August 10, 2010 (CMB/lcw/2.416/SUP/11350) respectively, April 28, 2011 (CMB/1.13/INT/102), of the following two state decrees that were enacted by the Government of Aruba:

- Sanctions State Decree to Combat Terrorism and Terrorist Financing (AB 2010 no. 27). Pursuant to article 4, paragraph 1, of the this state decree, all funds or other assets present in Aruba that belong directly or indirectly to a designated person (refers to natural persons, legal person and entities on one of the freezing lists), are frozen.
- Sanctions State Decree Libya 2011 (AB 2011 no. 25). Pursuant to article 2, paragraph 1, of the this state decree, all funds or other assets present in Aruba that belong directly or indirectly to, are owned by, are in possession of or are under the control of a natural person, legal entity or other entity, mentioned in Annex II of the United Nations Security Council Resolution 1970 (2011) respectively United Nations Security Council Resolution 1973 (2011), are frozen.

Pursuant to article 1, paragraph 2, of the Sanctions State Decree to Combat Terrorism and Terrorist Financing, and article 4, paragraph 2, of the Sanctions State Decree Libya 2011 the CBA is entrusted with the supervision of compliance with these state decrees by financial institutions or trust service providers.

Reporting requirements

Sanctions State Decree to Combat Terrorism and Terrorist Financing

- Pursuant to article 4, paragraph 4, of this state decree it is required, when frozen funds or other assets are in the custody of your institution or trust service provider, to promptly take such measures so that these funds and other assets cannot be transferred, converted,

¹ The text hereof can be found on the CBA's website www.cbaruba.org.

moved or made available. You must report to the CBA any frozen funds or other assets which are in the custody of your institution or trust service provider.

- Pursuant to article 8 of this state decree you are required to report each request for a service whereby a designated person (refers to natural persons, legal person and entities on one of the freezing lists) acts as counterparty or is involved in any way, to the CBA.
- Pursuant to article 11 of this state decree, if in case of a request for rendering a service regarding a frozen fund or other asset it has been established that the fund or other asset belongs to a person or organization bearing the same or a similar name as the designated person, this must be reported to the CBA.

Sanctions State Decree Libya 2011

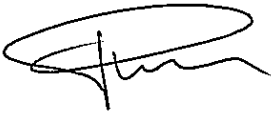
- Pursuant to article 3, paragraph 2, of this state decree it is required, when frozen funds or other assets are in the custody of your institution or trust service provider, to take such measures, so that these funds and other assets cannot be used, transferred, converted, moved or made available. You must report to the CBA any frozen funds or other assets which are in the custody of your institution or trust service provider.

Reporting form

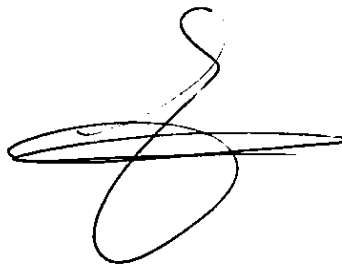
In connection with aforementioned reporting requirements the CBA has issued a reporting form (enclosure 1) and further written guidance (enclosure 2) on the reporting procedure. The reporting form must be used for the reporting to the CBA as previously mentioned notwithstanding the obligation to also (where applicable) report to the MOT. This form and the further guidance can also be found on the CBA's website under the heading "Financial Sanctions".

Should you have any questions, you can contact Mrs. Charlene Linders-Bryson or Mr. Bas Jennen of the Integrity Supervision Department at telephone number (297) 5252-178, respectively, (297) 5252-229 or by e-mail, c.m.linders-bryson@cbaruba.org respectively, b.jennen@cbaruba.org.

Sincerely yours,



Centrale Bank van Aruba



Enclosures: 2