

dti

the department for Enterprise

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The Rt. Hon. Peter Lilley MP
Secretary of State for Trade and Industry

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CHD
2/4.

Dear Secretary of State

IRAQ/KUWAIT SANCTIONS: ENFORCEMENT AND CO-ORDINATION

Over the last few days I have been concerned to sharpen up the arrangements between Departments for the rigorous pursuit of reports suggesting potential breaches of sanctions. And, as a result of your morning meeting last Wednesday, MISC 118 (the official Group on Policy toward selected Non-Community Countries) next day considered various aspects of these arrangements

MISC 118 invited the DTI to establish forthwith an Embargo Enforcement Unit (EEU), under DTI chairmanship, with representatives of other interested Departments. Its main role will be to concert the investigation and pursuit of reports, especially those coming from the Embargo Surveillance Centre (ESC), of activities incompatible with the sanctions regulations needing action by home departments, including Customs and Excise, the Home Office and DTI itself. The FCO will of course continue to act on reports from ESC needing action abroad. The EEU will also advise where necessary on individual sanctions, import and export licensing decisions, and advise us on any necessary changes in the secondary legislation under which these are made. We will circulate details of the terms of reference, representation and method of working of the EEU as soon as possible, the aim being, wherever possible, to give Ministers quickly concerted advice agreed by all interested Departments.

I shall therefore take responsibility for the effective performance of this Unit and for the public presentation of decisions taken in this area: this does not require any change in formal Ministerial or Departmental responsibilities. I (and





the department for Enterprise

my Press Office) will need to be able to call on officials of other Departments for briefing and information, and I trust that you and our colleagues will be content with this. I will need of course to correspond or meet colleagues on policy and specific issues, and I should be grateful to be consulted on points touching on these matters.

As to the policy to be operated, I attach a paper on the implementation of UNSCR 661 (other than by import and export controls). It was prepared at the request of MISC 118 and has been agreed between Departments. I should draw attention to paragraphs 19-22 which give the flavour some of the more important implications, and to the publicity aspects and conclusions in paragraph 30-33. Subject to your views and those of colleagues, I propose that we should use this as an agreed initial guide to policy for the Embargo Enforcement Unit and that the conclusions should be put into effect.

I am copying this letter to the Prime Minister, John Major, Tom King, Cecil Parkinson, John Wakeham, Michael Howard, Patrick Mayhew, Robin Butler, Brian Unwin and Bernard Ingham.

Yours sincerely

(Approved by the Secretary of State and signed in his absence.)



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THE IMPLEMENTATION OF UN RESOLUTION 661 OTHER THAN BY
EXPORT/IMPORT CONTROLS

Note by the Department of Trade and Industry

Introduction

1. This paper has been prepared in response to the request from MISC 118 for proposals for dealing with Iraqi and Kuwaiti companies effected by the United Nations Sanctions Order.
2. The first part of the paper outlines the steps which the Bank of England, acting as the agent of HM Treasury, has taken to freeze Iraqi and Kuwaiti financial assets in the UK.
3. The second part of the paper sets out the implications of the Sanctions Order for Iraqi and Kuwaiti companies; suggests procedures for giving effect to the Order and ways of bringing them to public attention.

UN Resolution in relation to financial assets

4. UN Resolution 661 includes (paragraph 4) the decision that:

"... all states shall not make available to the Government of Iraq or to any commercial, industrial or public utility undertaking in Iraq or Kuwait, any funds or any other financial or economic resources and shall prevent their nationals and any persons within their territories from removing from their territories or otherwise making available to the Government or to any such undertaking any such funds or resources and from remitting any other funds to persons or bodies within Iraq or Kuwait, except payments exclusively for strictly medical or humanitarian purposes, and, in humanitarian circumstances, foodstuffs."

The following paragraphs describe the operation of the freeze of Iraqi and Kuwaiti financial assets in the UK.

UK Measures

5. Action was taken in the UK to freeze Kuwaiti assets on 2 August, and to freeze Iraqi assets on 4 August. The action took the form of Treasury directions under the Emergency Laws (Re-enactments and Repeals) Act 1964, which are contained in two Statutory Instruments. The key parts of the texts of the Statutory Instruments read:

"Except with permission granted by or on behalf of the Treasury, no order given by or on behalf of the Government of or any person resident in [Kuwait]

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[Republic of Iraq] at the time of the coming into force of these directions or at any later time while these directions are in force, shall be carried out, insofar as the order:

- (i) requires the person to whom the order is given to make any payment or to part with any gold or securities; or
- (ii) requires any change to be made in the persons to whose credit any sum is to stand or to whose order any gold or securities is to be held."

6. The directions apply to all persons in the UK, including bodies corporate, and to all UK citizens who are ordinarily resident in the UK, wherever they may currently be. They extend to the Channel Islands and the Isle of Man. They cover all financial assets. Their practical effect is to make it impossible for any person legally to carry out any order from an Iraqi or Kuwaiti owner of such assets which would have the effect of moving those assets, unless permission is given by or on behalf of the Treasury.

7. In practice, the administration of the directions is carried out by the Bank of England on the Treasury's behalf. The Bank has issued guidance, drawn up in consultation with the Treasury, which grants certain general permissions in relation to the directions. The purpose of these permissions is to ensure that good order in financial transactions is maintained, while the purpose and letter of the directions and of UN resolution 661 is respected. In relation to Kuwaiti financial assets there is a second purpose to the permissions: the need to avoid unnecessary damage to the economic interests of the legitimate Government of Kuwait (or paragraph 9 of UN resolution 661).

8. The guidance in relation to Kuwaiti financial assets grants general permission for payments to be made into Kuwaiti accounts in the United Kingdom ("Kuwaiti accounts" are sterling, foreign currency and gold bullion accounts held in the UK by Kuwaiti residents). Permission is also granted for certain payments out of these accounts, for eg living, medical, educational and similar expenses, and for payments to other Kuwaiti accounts. There is no general permission for payments to accounts outside the UK. Nor can changes in the ownership of gold or securities be made without specific permission.

9. The guidance in relation to Iraq is modelled closely on the guidance in relation to Argentina during the Falklands War. It permits payments into "Iraqi accounts" (defined similarly to Kuwaiti accounts). But it does not grant general permission for payments to be made for living expenses etc - specific permissions must be sought. Nor does it allow payments from the Iraqi account to another. The restrictions applied to Kuwaiti accounts apply, of course, to Iraqi accounts.

from UK or 3rd countries (in order to fulfil the UNR remit to protect assets of the lawful Kuwait Government). A first attempt at dividing companies into the 3 groups is at Annexes A, B and C.

20. If the policy set out in para 19 is endorsed the practical implementation is likely to mean that Iraqi businesses would be run down to a care and maintenance level or closed completely (with loss of some UK employment). For Kuwaiti companies controlled from Kuwait or Iraq decisions would be ad hoc and would involve consideration of the nature of the business and the implications for its longer-term viability and, in some circumstances, implication for UK employment. For Kuwaiti companies controlled other than from Kuwait and Iraq, it may prove most practicable to issue open licences for supply of goods to the specific companies concerned by any UK company or citizen.

21. If a ban on delivery of goods is to be made effective then a prohibition on mail delivery seems essential to prevent simple evasion, but this would require warrants under the Interception of Communications Act 1984. Telecommunications are probably best left in place for safety, humanitarian and security reasons.

Position of UK registered companies "controlled from Iraq - Kuwait"

22. There are a number of UK registered companies which are owned or controlled by Iraqi companies or residents. Some of these have been involved in arms procurement. While these companies are clearly front runners for severe treatment it must be borne in mind that in at least one case (Matrix Churchill) the implications for the UK machine tool industry and for its UK suppliers of a virtual close down may be significant. It might be possible to explore obtaining undertaking from the firms about ceasing to trade with Iraq or Kuwait but certainly in the case of Matrix Churchill such undertaking would in the light of previous experience be of little worth. It is worth noting that the finances of Matrix Churchill seem in a parlous condition.

23. Consideration is needed as to the way in which people might be advised of the need to obtain a licence to supply goods to UK companies controlled from Iraq this is covered in paras 30 and 31 below.

Actions other than the supply of goods

24. Article 2(1)(c) prohibits any person from doing any act calculated to promote exports from Iraq or Kuwait. Article 2(2) prohibits any person from processing goods which have been exported from Iraq or Kuwait after 6 August or doing any act calculated to promote dealing in or processing goods exported

from Iraq or Kuwait after 6 August. Article 3(c) prohibits any person from doing any act calculated to promote the supply of goods which are not in either country to a PIK or for the purpose of any business carried on in Iraq or Kuwait in contravention of Article 3(a) or (b).

25. These prohibitions affect the provision of services. Persons could promote exports/imports in a number of ways; by insuring goods or vessels or by providing services in Iraq (eg as an architect of a new harbour or supervisor of a plant exporting goods). Unlike the case of supply of goods, however, the act of supplying services to a PIK is not in itself an offence.

26. In the case of individual contractors currently caught in Iraq and Kuwait the proposed line is that enforcement of the UK measures will of course take account of the predicament of British nationals who are unable to leave Iraq or Kuwait. Once British nationals are free to leave the position will be different.

27. The position of UK companies and citizens resident in the UK who are providing services to PIKs has caused most difficulty so far. Decisions have been on a case by case basis so far - using the criterion of helping to preserve Kuwaiti assets. One significant service - the provision of electricity - has not yet been discussed, but supplying power for manufacturing purposes to a company making goods from Iraq could be an offence. Given the safety, practicality, and possible adverse PR consequences of cutting off electricity supply it would seem sensible only to consider cutting power supplies for production equipment.

28. For all other services (eg insurance) the line which seems to attract interdepartmental support is that where UNSO is applicable, services should be allowed in support of any other licensed activity (eg insurance of any licensed flights by Iraq Air), and that to minimise time spent on resolving complex legal and contractual problems the licensing regime should be more relaxed as the service becomes more distantly related to the import or export of goods to and from Iraq and Kuwait.

UK Citizens abroad

29. A special category of those possibly affected by the whole Order consists of UK citizens living abroad and operating companies which are, on past record, likely to play a role in sanctions breaking. It may be that the only practicable steps for these people is a public statement about supplying them with a simultaneous demarche to the host country's government.

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10. As noted, the directions as they apply to private persons rest on the concept of residence. This is determined by reference to the facts, including location, ownership, day-to-day control and management. Residence dates from the date of the instructions, and no subsequent change in status is possible without reference to the Bank of England. If a person is deemed not to be a resident of Kuwait or Iraq, orders made by him are not subject to the restrictions of the directions. For practical purposes, however, if he is not a resident of Iraq or Kuwait and he is operating in the UK he will be deemed instead to be a UK person, and he will thus himself be unable to carry out such orders without permission from the Treasury. A note of the persons so far determined as resident in Iraq/Kuwait, and those determined as UK resident, is attached at Annex 1.

11. If an order is given by a person affected by the directions, the Bank determines in consultation with the Treasury whether the order can be carried out. The guiding principle in relation to Kuwait residents is that as far as possible bona fide Kuwait organisations should be allowed to carry out their normal economic activities, provided that there is no risk of assets being sent to Iraq or to Iraq-occupied Kuwait. The determination of whether a Kuwait resident organisation is bona fide is made by reference to the facts. The only Kuwait organisations with significant assets in the UK are controlled by the legitimate Government of Kuwait. These are considered bona fide. They include the Kuwait Investment Office (KIO) and the Kuwait Petroleum Corporation (KPC). The Treasury and Bank are seeking to develop ways in which these organisations can continue to operate normally in the UK. This is analogous to the treatment which other major Western countries are giving to them (see paragraph 10, below). There are few Iraq resident companies in the UK. The presumption in their case is that permission should not be granted for the carrying out of orders.

12. Our information is that other major Western countries are approaching the freeze of Iraqi and Kuwaiti assets in the same way as the UK. The US authorities' power originally covered only Iraqi and Kuwaiti public sector assets. They are seeking to extend these powers to cover private persons. The US authorities are allowing the KIO to manage its assets freely provided that they are lodged with US controlled financial entities (including overseas branches of these entities). The Japanese authorities have given similar freedoms to the KIO. The French authorities are allowing all Kuwaiti persons to manage their assets freely within French jurisdiction. Our understanding is that all Western countries are applying much tighter sanctions against Iraqi assets, along similar lines to ourselves.

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Non-financial Sanctions

The Position of "A Person in Iraq or Kuwait"

The UN sanctions Order (UNSO) prohibits any person from (a) supplying goods to or to the order of "a person in Iraq or Kuwait"; (b) supplying goods to any person if knowing or having reasonable cause to believe that the person will deliver the goods to "a person in Iraq or Kuwait" or that the goods will be used for the purposes of a business carried on or operated from Iraq or Kuwait; or (c) doing any act calculated to promote the supply of goods to "any person in Iraq or Kuwait."

14. The term "person in Iraq or Kuwait" is defined for this purpose as including any body constituted or incorporated under the law of Iraq or Kuwait and any body carrying on a business (whether within Iraq or Kuwait or not) which is controlled by persons or bodies resident in Iraq or Kuwait or constituted or incorporated under the law of Iraq or Kuwait.

15. The prohibition applies to actions by any person within the UK and the actions by UK citizens (including UK registered companies) abroad.

16. The practical consequence of UNSO is that since 9 August it has been an offence to supply goods to a "person in Iraq or Kuwait" (PIK) (eg to deliver computer paper to Iraq Air in London). DTI has issued an Open General Licence to allow basic provisions and fuel to be delivered to such persons for their own use. Further items may be licensed in this way. Specific licences have also been issued to specific companies to enable deliveries of oil to Kuwait Petroleum in the UK and Italy, and to Kuwait Air in the UK. These have been ad hoc decisions cleared inter-departmentally to enable the Kuwaiti companies which were in the process of being deemed "bona fide" by the Treasury (see para 11 above) and run from the UK to continue in business.

17. Decisions are needed on a longer term basis as to the extent the Government will allow UK companies and citizens lawfully to supply PIK and to how we are to advise the public of what is lawful.

18. It seems likely that PIK will fall into 3 categories (and may move between at least 2 of them): (i) Iraqi, (ii) Kuwaiti controlled by the puppet government from Iraq and (iii) Kuwaiti controlled from outside Iraq and Kuwait.

19. In principle it would seem that the spirit of UNR 661 would lead the Government to be very highly restrictive of Iraqi businesses, possibly less restrictive on Kuwaiti companies controlled from Kuwait (in order to keep business ticking over pending restoration of the lawful Kuwait Government) and relatively relaxed about businesses controlled

Publicity

30. A crucial step in effective implementation of the UNSO is making the public aware of the issue. Statements will need close legal scrutiny to avoid liability, and will require careful handling in respect of provoking reactions in Iraq. The UNSO has been published in the quality press but no publicity at all has so far been given to the Open General Licence or to the implications of the UNSO.

31. Once clear policy guidelines have been agreed a possible sequence would be:-

- 1) publish Open General Licences, and a List of Kuwait persons for whom general licences to supply had been granted
- 2) Completion of detailed research to establish which other companies are a "person in Iraq or Kuwait" for the purposes of the Order and possibly publication of the list. By the implication this would identify those for whom licences might not be issued.
- 3) As further FIKs are identified publish further lists.

Conclusion

32. Implementation of the UNSO is likely to be a difficult and sensitive task which will need careful legal scrutiny and co-ordination within Whitehall - with agreement on public statements, notices and licences.

33. Subject to that important qualification it is recommended:

- (i) That policy on licensing should be implemented:
 - (a) restrictively for Iraqi and Iraqi controlled businesses
 - (b) on a case by case for Kuwaiti controlled businesses (using the DTI daily meeting for the purpose)
 - (c) freely for Kuwaiti businesses controlled from outside Iraq or Kuwait
- (ii) That Open General Licences should be published forthwith
- (iii) That compilation of a list of Iraqi and Kuwait persons should continue urgently
- (iv) That the issues surrounding publication of such a list should be discussed by lawyers and then agreed by Misc 118 prior to submission to Ministers for approval to publish.

ANNEXES

- A. KUWAIT COMPANIES BEING TREATED AS UK RESIDENT BY THE BANK OF ENGLAND
- B. IRAQ OWNED COMPANIES
- C. KUWAIT OWNED COMPANIES

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ANNEX A

KUWAIT COMPANIES BEING TREATED AS UK RESIDENT BY THE BANK OF ENGLAND

Kuwait Petroleum (GB) Ltd
Cannock Fuels Ltd (80%)
Fenking Fuels Ltd
Fernhurst Fuels Ltd
Branston Fuels Ltd
Markim Fuels Oils Ltd
Laser Fuels Ltd
R W Wharton Ltd
R P Fuels Ltd
Ross Chemicals & Storage Co Ltd
M Kamper Services Ltd
Kuwait Petroleum Lubricants Ltd
Golden Eagle Petroleum Co Ltd
Golden Eagle Petroleum (Holdings) Ltd
Kuwait Petroleum International Ltd
Kent Petroleum Ltd
Kuwait Petroleum International Aviation Co Ltd
Kuwait Petroleum International Aviation Co (UK) Ltd
Santa Fe Exploration (UK) Ltd
Santa Fe Minerals Onshore (UK) Ltd

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KUWAIT OWNED COMPANIES

Company: KUWAIT NATIONAL PETROLEUM COMPANY (KSC)

Ultimate: Kuwait petroleum Corporation (Kuwait)

Company: ROSS CHEMICAL & STORAGE CO LTD

Holding: Ultamar Golden Eagle Ltd

Ultimate: Kuwait Petroleum International NV
(Kuwait)

Company: E E M C (UK) SERVICES LTD

Ultimate: EEMC Kuwait (Kuwait)

Company: KUWAIT PETROLEUM (UK HOLDINGS) LTD

Ultimate: Kuwait Petroleum Corporation (Kuwait)

Company: A V N O HOLDINGS LTD

Holding: Mizea Ltd (Isle of Man)

Ultimate: International Realty Investment Group
(Kuwait)

Subsids: TRACY PARK LEISURE LIMITED

Company: CANNON FUELS LTD

Holding: Kuwait Petroleum (GB) Ltd (RN 00762360)

Ultimate: Kuwait Petroleum Corporation (Kuwait)

Company: KUWAIT PETROLEUM INTERNATIONAL AVIATION CO LTD

Ultimate: Kuwait Petroleum Corporation (Kuwait)

Subsids: KUWAIT PETROLEUM INTERNATIONAL AVIATION
COMPANY

Company: KUWAIT PETROLEUM INTERNATIONAL LTD

Co Ltd Holding: Kuwait Petroleum International Aviation

Ultimate: Kuwait Petroleum Corporation (Kuwait)

Company: KUWAIT PETROLEUM INTERNATIONAL LTD

Ultimate: Kuwait Petroleum Corporation (Kuwait)

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Company: NORMANDIE HOUSE (KNIGHTSBRIDGE) LTD

Holding: Hallstrong (Kuwait)
Ultimate: Al-Sabahia Inc (Panama)

Company: LASER FUELS LTD

Holding: Kuwait Petroleum (G.B.) Ltd
Ultimate: Kuwait Petroleum Corporation (Kuwait)

Company: RODAN SPORTS LTD

Ultimate: Kuwait Investment Office (Kuwait)
Subsidiaries:
AUTOBAR GROUP LIMITED
AUTOBAR INDUSTRIES LIMITED
AUTOBAR FOOD SERVICES LIMITED
HOTEL & CATERING SUPPLIES LIMITED
MONO CONTAINERS LIMITED
ST MARTINS HOSPITALS LIMITED
ST MARTINS PROPERTY CORPORATION LIMITED
TIMEREGAL LIMITED
CHEQUER FOODS LIMITED
EYBRACAN LIMITED

Company: R P FUELS LTD

Holding: Pace Petroleum Ltd (RN: 00854561)
Ultimate: Kuwait Petroleum Corp (Kuwait)

Company: TRACY PARK LEISURE LTD

Holding: Irig (UK) Ltd
Ultimate: International Realty Investment Group
(SAK) (Kuwait)

Company: MARKIM FUEL OILS LTD

Holding: Kuwait Petroleum (GB) Ltd
Ultimate: Kuwait Petroleum Corporation (Kuwait)

Company: AUTOBAR EQUIPMENT & SERVICES LTD

Holding: St Martins Holdings Ltd
Ultimate: Kuwait Investment Office

Company: KUWAIT PETROLEUM CORPORATION (UK) LTD

Ultimate: Kuwait Petroleum Corporation (Kuwait)

IRAQ OWNED COMPANIES

Company: TECHNOLOGY & DEVELOPMENT GROUP LTD

Ultimate: The Al-Arabi Trading Co Ltd (Iraq)

Company: MAPPIX CHURCHILL LTD

Holding: T M G Engineering Ltd

Ultimate: Al-Arabi Trading Co Ltd

Company: NEWCAST FOUNDRIES LTD

Holding: T M G Engineering Ltd (RN: 02142819)

Ultimate: Al-Arabi Trading Co Ltd (Iraq)

Company: THE RAFIDAIN BANK

Person Authorised: Tarik Al-Sayati
7-10 Leaden Hall Street
London EC3V 1NL

Business Address: Not notified

Company: ASSOCIATED ENGINEERING

Company: W I INTERNATIONAL

Company: PMK/QUDOS (LIVERPOOL POLYTECHNIC)

Company: GEODESIGNS

Company: REYNOLDS AND WILSON

Company: FALCON SYSTEMS

Company: ENDSHIRE EXPORT MACKETING

Company: DOMINION INTERNATIONAL

Company: SOLLATEX

Note: DTI are obtaining further information on the above

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Company: BRANSTON FUELS LTD

Holding: Kuwait Petroleum (GB) Ltd
Ultimate: Kuwait Petroleum Corporation (Kuwait)

Company: ROBERTS PETROLEUM LTD

Holding: Kuwait Petroleum (GB) Ltd (RN:00762360)
Ultimate: Kuwait Petroleum Corporation (Kuwait)

Company: SANTA FE (UK) LTD

Holding: Santa Fe International Co (USA)
Ultimate: Kuwait Petroleum Corporation (Kuwait)

Company: NORSMEC LTD

Holding: Santa Fe International Finance Corp (USA)
Ultimate: Kuwait Petroleum Corporation (Kuwait)
Subsidiaries: SANTA FE BRAUN (UK) LTD

Company: KUWAIT PETROLEUM (GB) LTD

Holding: KP (UK) Holdings Ltd
Ultimate: Kuwait Petroleum Corporation (Kuwait)
Subsidiaries: LASER FUELS LIMITED
MARKIM FUEL OILS LIMITED
R W WHARTON LIMITED
CANNON FUELS LIMITED
PERCY & HALSEN (HOLDINGS) LIMITED

Company: KUWAIT PETROLEUM FUELS LTD

Holding: Kuwait Petroleum (GB) Limited
Ultimate: Kuwait Petroleum Corporation

Company: R W WHARTON LTD

Holding: Kuwait Petroleum (GB) Ltd
Ultimate: Kuwait Petroleum Corporation (Kuwait)

Company: AUTOBAR GROUP LTD

Holding: St Martins Holdings Ltd
Ultimate: Kuwait Investment

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Company Number: FC 10896
Company Name: KUWAIT OIL TANKER COMPANY SAK
Person Authorised: Simon David Dixson Quinnell
80 New Bond Street
London W1Y 9DA
Business Address: As above

Company Number: FC 11139
Company Name: RETRO CHEMICAL INDUSTRIES COMPANY (KSC)
Person Authorised: Abdul Samar Hassan Blouxi
80 New Bond Street
London W1Y 9DA
Business Address: As above

Company Number: FC 12501
Company Name: AL-BAN TRADING COMPANY
Person Authorised: Fredrick Edward Kram
31 Delta Road
Worcester Park
Surrey KT4 7HP
Business Address: As above

Company Number: FC 8059
Company Name: GULF BANK KSC LTD
Person Authorised: Celia Eldered & Graham Martin Berritt
1 College Hill
London EC4R 2RA
Business Address: Not known

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Company Number: FC 9177

Company Name: UNITED ARAB SHIPPING COMPANY (SAG)

Person Authorised: Mr Muhsin Ali Abdullah
Lloyds Chambers
1 Portsoken Street
London E1 8BT

Business Address: As above

Company Number: FC 10951

Company Name: NATIONAL BANK OF KUWAIT SAK

Person Authorised: Ramez Rhalil Sarkis & Alan Bell
13 George Street
London W1H 5PB

Business Address: As above

Company Number: FC 13034

Company Name: THE COMMERCIAL BANK OF KUWAIT

Person Authorised: Jordan Company Secretaries Ltd
47 Brunswick Place
London N1 6EE

Business Address: St Alphage House
18th Floor
2 Fore Street
London EC2Y 5PA

Company Number: FC 9595

Company Name: THE SUSSEX STUD LTD

Person Authorised: Basil Llewellyn Thomas B.Dyde Esq
The Coach House
69B Grand Avenue
Worthing
W Sussex

Business Address: Not Known

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Company: ST MARTINS PROPERTY CORPORATION LTD

Holding: St Martins Holdings Ltd
Ultimate: The Government of the State of Kuwait

Company: TIMEREGAL LTD

Holding: St Martins Holdings Ltd
Ultimate: Kuwait Investment Office (Kuwait)

Company: SADLER & CO LTD

Holding: Kuwait Petroleum (GB) Ltd
Ultimate: Kuwait Petroleum Corp (Kuwait)

Company: LIVESTOCK TRANSPORT AND TRADING CO KSC
SUBSID: RURAL EXPORT AND TRADING (WA) PTY LTD

Company Number: FC 9703

Company: AL-MAWRID TRADING & CONTRACTING WILL

Ceased trading

Company Number: FC 5764

Company: KUWAIT AIRWAYS CORPORATION

Person Authorised: Abdulrahim Al Awadi
15-20 Bailer Street
London W1H 2AD

Business Address: As above



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