

**Name of organisation** United Bank UK

**Address** 2 Brook Street, London W1S 1BQ

**Date & Country of Incorporation** 1<sup>st</sup> December 2001 / UK

**Location of Overseas Branch Network (if any)**

None

**Registered Office** 2 Brook Street, London W1S 1BQ

**Principal place of business** 2 Brook Street, London W1S 1BQ

**Registration No.** 4146820

**Regulator Name** Prudential Regulation Authority / Financial Conduct Authority

**Nature of licence** Deposit Taking

**Location of Head office** 2 Brook Street, London W1S 1BQ

**Website** www.ubluk.com

**GIIN Number:** 8TY5JW.00005.ME.826

**Contact name of MLRO / Compliance Officer** Trevor Davies

**Telephone** 020 3326 9976

**E-mail** trevor.davies@ubluk.com

*For the purpose of this questionnaire "physical presence" means a place of business:*

- *Located at a fixed address (other than solely an electronic address, a post office address or an accommodation address); and*
- *In a country in which the bank is authorised to conduct banking activities; and*
- *Where the bank employs one or more individuals full time and maintains operating records related to banking activities; and*
- *Where the bank is subject to inspection by the banking authority which licensed the bank to conduct banking business.*

**Ownership Structure:**

United Bank Limited (55%)

National Bank of Pakistan (45%)

Is the organisation: -

Publicly owned

No

Listed in any stock exchange

No

**Directorship:**

Please provide a detailed list of executive and non-executive directors of the main board of Directors.

**Mr Saeed Ahmed, Mr Risha Moyheddin, Mrs Sima Kamil, Mr Mansoor Masood KHAN, Mr Bande HASAN, Mr Richard Brian Wilton and Mr Muhammad AMINUDDIN**

**Major Business Activities:**

What are the major business activities in which your institution is involved? Please provide a complete and detailed list of financial and non-financial business activities of your organization.

**Retail, Wholesale, Trade Finance, Treasury, Islamic Mortgages and Lending**

**Money laundering prevention & detection measures**

Are there specific laws and/or regulations in place covering anti money laundering in line with FATF recommendations on anti money laundering	Yes نف
Does your organisation have written policies and procedures for the prevention of money laundering and terrorist financing?	Yes نف
Are the policies and procedures sufficient to meet the anti money laundering and counter terrorist financing international best practice guidelines	Yes نف
Are the above policies applied to all your branches, head office, overseas branches and majority owned subsidiaries?	Yes نف
If yes, does this policy apply to all of your business operations?	Yes نف
Is Money Laundering a Criminal Offence in your country?	Yes نف
Do you have effective controls in place to prevent and identify the proceeds the of money laundering and terrorist financing through your system?	Yes نف
Do you report suspicious transactions to a law enforcement agency or other agency designed for that purpose?	Yes نف
Do you verify the identity of all your customers prior to opening accounts?	Yes نف
Do you verify the identity of all your customers including "occasional customers", prior to providing value transfer services (such as telegraphic transfers, bank cheques or trade transactions)?	Yes نف
Does your organisation maintain a complete record of customers and account beneficiaries, identification, transaction history, correspondence etc, for a specified time period	Yes نف
If so what is the time period	Minimum 5 years
Do you "know your customer" and ask for clear specification for the purpose of accounts and continue to monitor the same at your end?	Yes نف
Does your KYC process extend to relationship with other banks?	Yes نف
Does your organisation ensure that all possible measures are taken on an ongoing	

basis to obtain information about the identity of the customers to ensure legitimate activities?	Yes ٢
Please confirm that you provide banking services to only those banks / financial institutions with a "physical presence".	Yes ٢
Do you verify that your customers are not representing a shell company?	Yes ٢
Do you take measures against the direct use of correspondent accounts by any third party (i.e. in case of payable through accounts)?	Yes ٢
Do you verify the identity of and perform due diligence on the customers having direct access to accounts of the correspondent banks?	Yes ٢
Do you search your customer account database for terrorist names?	Yes ٢
If yes, please indicate the sources you use. <u>HM Treasury, OFAC, EU, UN</u>	
Do you have an employee training program for the prevention of money laundering and terrorist financing, requiring all staff to undertake training?	Yes ٢
If so, how frequently? <u>On induction then annual refresher training thereafter</u>	
Do you have policies and procedures for independent audit or testing of your anti-money laundering compliance?	Yes ٢
If so, how frequently are these audits / tests conducted? <u>Annually</u>	
Do you have a money laundering reporting officer for coordinating / monitoring compliance?	Yes ٢
Has your regulator published guidance notes and policies to combat money laundering and terrorist financing	Yes ٢
Does your regulator undertake monitoring visits, on a regular basis, to assess your anti money laundering and counter terrorist financing policies and procedures	Yes ٢
Has your regulator published details of individuals or organisations suspected of money laundering or terrorist activities?.	Yes ٢
Do you filter your transactions against these details	Yes ٢
Please indicate the sources you use <u>HM Treasury, OFAC, EU, UN</u>	
Does your organisation have a policy for dealing with politically exposed persons (PEP)	Yes ٢
Has your organisation been prosecuted, fined by your regulator for failure to comply with stipulated anti money laundering or counter terrorist financing regulations	No ٢

<b>Bribery and Facilitation payments</b>	
Does the country in which you are located have established laws designed to prevent bribery and facilitation payments?	Yes ٢
Do your policies and procedures meet the requirements of local law and regulations	Yes ٢

concerning bribery and facilitation payments?

Does your policy clearly define roles, responsibilities, and accountability of each member of staff in relation to bribery and facilitation payments? Yes

Do you have an employee-training programme covering prevention of bribery and facilitation payments requiring all staff to undertake training? If so how frequently is training undertaken? Yes

Do you have a record of training completed by staff, including attendance sheets and the training material? Yes

Do you have arrangements for the independent monitoring and auditing of compliance within policies and procedures? Yes

Completed By

Trevor Davies

Signature



Money Laundering Reporting Officer

25<sup>th</sup> September 2017

***For United Bank UK Use Only***

***Received:***

***Reviewed:***

***MLRO Approval:***