

## UBL UK Counterparty Questionnaire (March 2022)

**Name of organisation:** UBL UK (United National Bank Limited),

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

**Date & Country of Incorporation:** 24 January 2001– incorporated in the 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 / Consumer Credit / Dealing in Investments as principal (with limitations)

**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:** Toby Varkey

**Telephone:** 020 7290 8067

**E-mail:** Toby.Varkey@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.

1.	Zubyr Soomro
2.	Richard Brian Wilton
3.	Bande Hassan
4.	Masarrat Husain
5.	Shazad Dada
6.	Zia Ijaz
7.	Arif Usmani
8.	Brian Gilbert Firth
9.	Muhammad Faraz Haider

**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, Residential Real Estate Finance.

**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
Does your organisation have written policies and procedures for the prevention of money laundering and terrorist financing?	Yes
Are the policies and procedures sufficient to meet the anti money laundering and counter terrorist financing international best practice guidelines	Yes
Are the above policies applied to all your branches, head office, overseas branches and majority owned subsidiaries?	Yes
If yes, does this policy apply to all of your business operations?	Yes
Is Money Laundering a Criminal Offence in your country?	Yes
Do you have effective controls in place to prevent and identify the proceeds the of money laundering and terrorist financing through your system?	Yes
Do you report suspicious transactions to a law enforcement agency or other agency designed for that purpose?	Yes
Do you verify the identity of all your customers prior to opening accounts?	Yes

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
Does your organisation maintain a complete record of customers and account beneficiaries, identification, transaction history, correspondence etc, for a specified time period	Yes
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
Does your KYC process extend to relationship with other banks?	Yes
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
Please confirm that you provide banking services to only those banks / financial institutions with a “physical presence”.	Yes
Do you verify that your customers are not representing a shell company?	Yes
Do you take measures against the direct use of correspondent accounts by any third party (i.e. in case of payable through accounts)?	Yes
Do you verify the identity of and perform due diligence on the customers having direct access to accounts of the correspondent banks?	Yes
Do you search your customer account database for terrorist names?	Yes
If yes, please indicate the sources you use.	HM Treasury (OFSI), OFAC, EU, UN
Do you have an employee training program for the prevention of money laundering and terrorist financing, requiring all staff to undertake training?	Yes
If so, how frequently? On induction, as well as Computer Based Online Financial Crime training throughout the year and face-to-face training sessions for the Business areas (and any other necessary departments) as and when required.	
Do you have policies and procedures for independent audit or testing of your anti-money laundering compliance?	Yes
If so, how frequently are these audits / tests conducted?	Annually
Do you have a money laundering reporting officer for coordinating / monitoring compliance?	Yes
Has your regulator published guidance notes and policies to combat money laundering and terrorist financing	Yes
Does your regulator undertake monitoring visits, on a regular basis, to assess your anti money laundering and counter terrorist financing policies and procedures	Yes
Has your regulator published details of individuals or organisations suspected of money laundering or terrorist activities?.	Yes
Do you filter your transactions against these details	Yes

Please indicate the sources you use: HM Treasury (OFSI), OFAC, EU, UN

Does your organisation have a policy for dealing with politically exposed persons (PEP) Yes

Has your organisation been prosecuted, fined by your regulator for failure to comply with stipulated anti money laundering or counter terrorist financing regulations No

**Bribery and Facilitation payments**

Does the country in which you are located have established laws designed to prevent bribery and facilitation payments? Yes

Do your policies and procedures meet the requirements of local law and regulations concerning bribery and facilitation payments? Yes

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? On induction, as well as Computer Based Online Financial Crime training covering bribery and corruption during the year. 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 with policies and procedures? Yes

**Completed By:**

Toby Varkey (Chief Compliance Officer and MLRO)

**Signature:**



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Toby Varkey, Chief Compliance Officer & MLRO

**Date:** 31<sup>st</sup> March 2022