



Name of the staff member	Mr. / Ms.
Job Title/ Designation	Deputy Money Laundering Reporting Officer (Dy. MLRO) (under double hatting – BOBLB and BOBUKL)
Department Name	Compliance and AML
Report to	Chief Compliance Officer and MLRO (SMF16 &17), BOB, London Branch (under double hatting – BOBLB and BOBUKL)
Direct reports	Analysts/ Other staff members in the department
Date of taking over the role	DD October 2024
Key Responsibilities:	<ul style="list-style-type: none"> • Act as a certified person undertaking prevention of money laundering and financial crime. • Develop and maintain the firm’s anti-money laundering and counterterrorist financing policy in line with evolving statutory and regulatory obligations. • Co-lead with the MLRO, the s166 Remediation Program through to a successful outcome. • Support and co-ordinate management focus on the money laundering risk in individual business areas. • Assist management in developing and maintaining an effective anti-money laundering and counter-terrorist financing compliance culture. • Ensure that the firm’s risk management policies, risk assessment profile and their application are adequately documented. • In consultation with MLRO, create and maintain the money laundering risk- based approach and the risk assessment of the firm’s customers, products and services. • Establish and maintain appropriate risk-based monitoring processes that are proportionate to the scale, nature and complexity of the firm’s operations. • Develop internal procedures in line with the requirements of the legislation and the relevant industry guidance. • Develop and maintain the firm’s risk-based AML strategies and the basis for the risk-assessment and monitoring process. • Ensure Transactional monitoring and all internal suspicious activity reports received are investigated without delay. • Ensure that a SAR is submitted to the relevant law enforcement agency in respect of all suspicions that have substance. • Undertaking new business reviews — including high risk accounts and PEP approvals, if any and also support FATCA/CRS reporting. • Arrange and implement relevant training, developing the current FC Training plan. Maintaining proper record of training and development programme and updating committees on any relevant and important progress/ status on the same. • Ensure that all staff are aware of their personal obligations and the firm’s policies and procedures and that the basis for the firm’s risk-based approach is understood and applied. • Ensure that staff comply with the stated policy and monitoring operations and development of the policy to this end. • Ensure that all relevant staff are adequately trained in money laundering and terrorist finance prevention that the standards and scope of the training is appropriate and that appropriate training records are kept.



	<ul style="list-style-type: none"> • Regularly review the effectiveness of money laundering compliance policies and procedures to prevent money laundering and countering the financing of terrorism. • Make recommendations for action to remedy any deficiencies in policies, procedures, systems or controls and follow up on those recommendations. • Represent the firm to all external agencies, e.g. regulators or law enforcement agencies, and in any other third-party enquiries in relation to money laundering prevention or investigation. • Remain aware of any relevant sanctions, prohibition or advisory notices. Also, if necessary, advise management and relevant staff of the names of any individuals and institutions on the sanctions list. • Provide support to Compliance team, as required. • Promptly respond to any reasonable request for information from the regulator and/or law enforcement agencies
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Skill / Competencies required:	
	<ul style="list-style-type: none"> • Good understanding of AML laws, regulations, and standards (e.g., FATF, AMLD, BSA, OFAC etc.). • Ability to analyze financial transactions, detect suspicious activity, and assess potential risks. • Thorough in reviewing customer records, financial data, and reports to identify irregularities or inconsistencies. • Ability to communicate effectively with internal teams, regulators, and law enforcement agencies. • Act as a support to the Money Laundering Reporting Officer (MLRO), taking over in their absence. • Skills in developing and delivering AML training to employees. • Knowledge of risk-based approaches for AML and counter-terrorist financing (CTF) programs. • Ability to design, implement, and oversee AML risk management processes and to use technology to identify and mitigate AML risks.

The following highlights the relevant conduct rules under the Senior Managers Regime. The bank will provide separate detailed guidance and training on these responsibilities from time to time.

Individual Conduct Rules:	
Conduct Rules COCON 2.1	
	<p><u>Rule 1</u>: You must act with integrity.</p> <p><u>Rule 2</u>: You must act with due skill, care and diligence.</p> <p><u>Rule 3</u>: You must be open and cooperative with the <u>FCA</u>, the <u>PRA</u> and other regulators.</p> <p><u>Rule 4</u>: You must pay due regard to the interests of <u>customers</u> and treat them fairly.</p> <p><u>Rule 5</u>: You must observe proper standards of market conduct.</p> <p><u>Rule 6</u>: You must act to deliver good outcomes for <u>retail customers</u>.</p>

Training	
	As per the Bank’s Training Plan and any additional training needs identified and approved by the department.