



## Anti-Financial Crime Policy Statement

### Introduction

The Board of Diamond Bank (UK) Plc (DBUK) recognise that financial crime is a threat to the Bank and to the financial services industry. DBUK is committed to the prevention of financial crime in all its forms – money laundering, terrorist financing, bribery and corruption, fraud and market abuse and human trafficking and slavery. The Bank employs Board approved and risk-based internal procedures, policies, systems and controls to ensure that high standards of crime prevention and awareness are maintained by all staff. DBUK has established a Financial Crime Programme to ensure that all financial crime risks are identified and appropriately mitigated to meet our legal and regulatory obligations to prevent, deter, detect and investigate all forms of financial crime.

### Anti-Money Laundering (AML)

As a financial institution regulated and supervised by the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA), DBUK is subject to a robust legal and regulatory framework. The principal obligations on which the Bank's AML systems and controls are based are contained in the Proceeds of Crime Act 2002 (POCA) as amended, the Terrorism Act 2000 (as amended), the Counter-Terrorism Act 2008, the Bribery Act 2010, the Money Laundering Regulations 2017, the FCA Handbook of Rules and Guidance and the Joint Money Laundering Steering Group (JMLSG) guidance for the UK Financial sector on the prevention of money laundering and combating of terrorist financing.

### AML Policy

DBUK's AML policy is designed to ensure that all Bank employees comply with the requirements as set out in the UK legislation, regulation, rules and industry guidance for the financial services sector. This policy includes the appointment of a Compliance Oversight and Money Laundering Reporting Officer (MLRO) – Senior Management Functions 16 and 17 respectively under the Senior Managers and Certification Regime (SMCR), a risk based customer due diligence programme incorporating customer identification and verification and know your customer principles, enhanced due diligence for higher risk customers, including but not limited to, politically exposed persons (PEPs), ongoing monitoring and control requirements, and internal and external suspicious transaction reporting obligations.

Staff are required to report any knowledge or suspicion of financial crime to the MLRO. Where appropriate, these concerns are reported to the relevant law enforcement and/or regulatory authorities. The Bank is committed to supporting law enforcement agencies to detect and confiscate criminal proceeds.

### Prohibited Customers / Relationships

DBUK prohibits anonymous accounts or relationships, engagement with shell banks and does not facilitate payable through accounts.

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## **Sanctions**

DBUK complies with all applicable sanctions or restrictions on activity with respect to targeted individuals, countries, governments and entities as imposed by the UK Treasury, the EU, the UN and the Office of Foreign Assets Control (OFAC), among others.

## **Anti-Bribery and Corruption**

DBUK has a zero tolerance policy in relation to bribery and corruption. The Bank recognises that these activities are often associated with organised crime, money laundering and terrorist financing. Cognisant of the negative implications of bribery and corrupt practices, the Bank's Financial Crime framework endorses its zero tolerance approach and sets the standards to be applied to the conduct of DBUK's business. These standards are reinforced in the Bank's Code of Conduct, Employee Handbook and employment contracts.

DBUK is committed to taking all steps to ensure that its stance is communicated to all stakeholders, including contractors, suppliers, intermediaries and group companies and embedded in relevant contracts.

## **Anti-Fraud**

DBUK does not tolerate fraud, impropriety or dishonesty and will investigate all instances where fraud is suspected either internally, with related parties or with external organisations. Penalties include dismissal and/or prosecution of any staff defrauding or attempting to defraud the Bank or its stakeholders and prosecution of any external parties.

## **Anti-Slavery and Human Trafficking**

The Bank takes a zero tolerance approach to any form of human slavery or trafficking or "Modern Slavery". It is committed to acting transparently, ethically and with integrity in all of its business dealings and commercial relationships. As a matter of best practice, DBUK policies and associated controls are designed to ensure that "Modern Slavery" does not take place within its business activities or its suppliers.

## **Record Keeping and Retention**

The Bank retains records associated with its obligations for a period of five years from the later of the date of the last transaction or the end of the customer relationship.

## **Training**

All Bank staff attend regular and mandated training as part of the Bank's financial crime programme. This includes, but is not limited to, money laundering and financing of terrorism concepts, principles with respect to customer due diligence, identification of suspicious transactions, channels for suspicious activity reporting, record keeping, and the Bank's financial crime framework.

## **Governance**

The Bank has a robust internal governance structure comprising a hierarchy of Board and Management committees. Regular review of the effectiveness of policies and procedures are performed in addition to internal and external audits to provide the Board and Senior Management with the necessary assurance regarding the operating effectiveness of the Bank's systems and controls.