

### 1. JOB DETAILS

Job title:	MLRO and Head of Financial Crime Compliance (SMF17)	Job grade:	Manager
Reports to:	Head of Compliance		
Department:	Compliance		

### 2. JOB PURPOSE

The MLRO role and responsibility covers each action / decision to maintain Anti-Money Laundering controls, rules, and regulations.

### 3. JOB DIMENSIONS

Number of staff supervised:	Direct reports:	5
	Total team size:	6
Financial dimensions:	Income target:	
	Operating budget:	
Other (e.g. number of branches, customer volumes):		

### 4. KEY ACCOUNTABILITIES

Description
<ul style="list-style-type: none"> <li>Assist Head of Compliance in their responsibility for the Banks policies and procedures for countering the risk that the Bank might be used to further financial crime;</li> </ul>
<ul style="list-style-type: none"> <li>Training of staff on Anti-Money Laundering, Countering Terrorist Financing, <b>Fraud Prevention</b> and <b>Data Protection Policies</b> and Procedures.</li> </ul>
<ul style="list-style-type: none"> <li>Attending to Suspicious Activity Reports from staff, conducting investigations to validate suspicion and reporting of suspicious transactions to NCA.</li> </ul>
<ul style="list-style-type: none"> <li>Conducting investigations to validate suspicion and reporting of suspicious transactions to NCA.</li> </ul>
<ul style="list-style-type: none"> <li>Monitor the SAR Investigation and Submission timelines.</li> </ul>
<ul style="list-style-type: none"> <li>Maintenance of records of suspicious transactions</li> </ul>
<ul style="list-style-type: none"> <li>Attending to Production orders</li> </ul>
<ul style="list-style-type: none"> <li>Attending to sequestration/garnishee orders</li> </ul>

- Attending to requests for assistance from various agencies e.g. NCA, Police Investigation, HMRC etc.
- Attending to and implementing sanction notifications / directives issued by HM Treasury OFSI, PRA/FCA Handbook or other authorities & provide guidelines to the respective areas of the bank.
- Develop hands on knowledge of the AML software necessary to carry out the monitoring for all branches.
- Producing and submitting the Annual REP-CRIM Financial Crime Report to the FCA in an accurate and timely manner.
- Produce MLRO Annual Report for review and approval of the Compliance and Transformation Committee and Board of Directors.
- To prepare MLRO Performance Summary Report on quarterly basis for review of the Compliance and Transformation Committee with respect to the Bank's overall compliance with the AML rules and regulations and industry best practices.
- Ensuring that the CTC is kept apprised of industry best practice and any developments and changes in the regulatory requirements / guidance and that internal procedures are updated as required.
- Keep updated with the Money Laundering Rules and Regulations, Legislations, and issue guidelines to all the employees of the Bank.
- Evaluate AML controls & processes of the bank and recommend changes to enhance the controls.
- Quality check of investigation done and disposition of transaction monitoring alerts.
- Conduct additional compliance related projects as delegated by the Head of Compliance.
- Deputize for the Head of Compliance as required; and
- Ad hoc tasks as requested / assigned from time to time by Head of Compliance / CTC / CEO.

## 5. QUALIFICATIONS AND EXPERIENCE

**Minimum qualifications:**

- Relevant Financial Crime & AML qualifications
- Current with relevant JMLSG guidance as applicable to the Bank
- Bachelors & Masters degree preferred

**Minimum experience:**

- Significant relevant experience in the capacity of MLRO / Head of Financial Crime Compliance in the Financial Services industry
- Broad, extensive knowledge of UK Regulations as relevant to the MLRO role. Deep FCC knowledge across Global AML, Sanctions and ABC
- Leadership experience in managing a team, strong organisational awareness & commitment with demonstrated ability to drive a team to execute and deliver 2nd line of defence objectives
- Proven experience of working with the UK Regulators
- Ability to build and maintain credible working relationships with Senior Management teams
- Preferably currently holding or having held FCA Senior Manager SMF17 or equivalent position

## 6. JOB CONTEXT

**Senior Managers & Certification Regime**

*This is a Senior Manager role under the Senior Managers and Certification Regime (SMCR). In addition to being approved by the UK Regulator, the incumbent will go through the Bank's annual certification process / fit & proper assessments in order to be assessed as fit to perform the role.*

*Senior managers are subject to the **Individual Conduct Rules & Senior Manager Conduct Rules** as outlined in the FCA Handbook COCON Section 2.*

**HBL Values**

*The incumbent must exemplify & abide by the HBL UK Values, Commitments & Behaviours:*

- *Integrity – Be Ethical & Fair*
- *Customer Centric – Deliver Great Experiences*
- *Value People – Respect, Empower, Appreciate*
- *Progressive – Innovate & Challenge*
- *Excellence – Be Your Best*

**Frameworks & Policies**

*This is a 2<sup>nd</sup> line of defence role and as such must ensure full compliance with the Bank's policies and frameworks relating to:*

*Compliance, Human Resources, IT & Information Security, Health & Safety, Risk & Credit, Operational Risk, Conduct Risk, Vendor Management, Whistleblowing, Complaint Handling, New Products, Services and Promotions, Expense Management & Internal Audit.*

### 7. APPROVALS

<b>Job holder</b>	
_____	_____
Signature	Date
<b>Line manager</b>	
_____	_____
Signature	Date