

# Our investment in financial crime controls

## Investment in people and training



Senior financial crime compliance (FCC) professionals with experience from 15+ top-tier international banks



Over 5,200 hours of training completed in new academy for FCC staff launched in 2016



35,000 hours of training completed in 2016 by our dedicated financial crime surveillance unit



Over 120,000 hours of mandatory e-learning completed by staff across the Bank in 2016 on anti-money laundering, anti-bribery and corruption, and sanctions compliance

## Improving processes and governance

- Enhanced customer due diligence policies, procedures and processes
- New financial crime risk models and assessments launched
- New committees devoted to overseeing and managing financial crime risk launched
- New specialised politically exposed persons, financial crime surveillance, assurance, and financial crime intelligence and investigations teams created

## Implementation of new systems

- Implementation of new transaction screening system
- Ongoing roll-out of new enterprise-wide case manager...
- ...alongside new transaction monitoring system
- New risk scoring system for client due diligence launched for the Private Bank with ongoing roll-out for other businesses