

# Business Banking Onboarding & UBO Verification SOP (Commercial Banking)

**Document Type:** Operational SOP

**Version:** 4.0

**Business Unit:** Westpac Business Lending & KYC

**Last Updated:** 22 May 2024

**Applies To:** New Business Accounts, Entity Verification, Relationship Managers

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## 1. Purpose

To define mandatory requirements for onboarding business entities and verifying beneficial ownership in compliance with AML/CTF obligations and Westpac risk policies.

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## 2. Types of Business Entities Covered

- Pty Ltd Companies
- Partnerships
- Trusts (Discretionary & Unit)
- Associations
- Sole Traders (low-risk only)

Excluded:

- Public companies
  - Superannuation funds
  - Correspondent banking
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## 3. Required Business Documentation

Businesses must provide:

1. Certificate of Incorporation
  2. ABN/ACN confirmation
  3. Company Constitution OR Partnership/Trust Deed
  4. Business Address Verification
  5. Nature of Business Activity Statement
  6. Source of Funds declaration for high-value accounts
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## 4. UBO Identification Rules

Identify and verify any individual with:

- **≥ 25% ownership**, or
- **Significant control**, even if shareholding <25%

UBOs must undergo:

- Identity verification
- Screening (sanctions, PEP, adverse media)

If a UBO is a PEP → automatic **EDD escalation**.

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## 5. High-Risk Industry Flags

Escalate if customer operates in:

- Digital currency exchanges
  - Cash-intensive businesses
  - Casinos or gambling
  - Charitable organisations sending international remittances
  - Precious metals & stones traders
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## 6. Relationship Manager (RM) Responsibilities

RMs must document:

- Business purpose
- Transaction expectations
- Annual revenue estimate
- Expected jurisdictions

If information is missing → do not proceed with account opening.

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## 7. Review Cadence

- Standard Business: every **2 years**
- Medium-risk: every **12 months**
- High-risk or PEP-linked: every **6 months**