

Business Banking Onboarding & UBO Verification SOP (Commercial Banking)

Document Type: Operational SOP

Version: 4.0

Business Unit: Westpac Business Lending & KYC

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

1. Purpose

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

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**.

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.

7. Review Cadence

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