

Meeting Notes - Compliance Committee (Nordlake Bank)

Date: 2026-02-15 | Chair: Head of Compliance | Attendees: KYC Lead, TM Lead, RM Rep, Legal

Agenda

- TM-8821 sanctions similarity escalation (Orion Trading LLC)
- UBO mismatch and missing documentation
- Decision: account restrictions / hold policy

Discussion (excerpt)

- TM Lead: Similarity score 87% triggers mandatory escalation. Need LEI / registration data for counterparty.
- RM Rep: Counterparty is supplier. Claims false positive; no invoice attached in pack.
- Legal: If unsure, restrict account and request documents. Document the rationale.
- Decision: Place temporary restriction on outbound payments for Orion until documents received and match cleared.

Action items

Action	Owner	Due	Definition of done
Request signed UBO declaration + passport scan for Orion	KYC Lead	2026-02-16	Documents stored in case system; evidence space cleared
Re-run sanctions screening with additional identifiers (DOB, reg number)	TM Lead	2026-02-16	Match cleared or escalated to external counsel; no further action
Notify RM of temporary restrictions and required documentation	Compliance Ops	2026-02-15	Email sent; logged; SLA timer started.