Financial Crime Risk

San UK is subject to the risks associated with money laundering, sanctions, terrorist financing, bribery and corruption and may be adversely impacted if it does not mitigate the risks of being used to facilitate financial crime. Santander UK is committed in its efforts to counter financial crime and to comply with applicable UK law and sanctions regulations. The Santander UK Group will apply strong controls to manage these risks and it has a minimal tolerance for residual Financial Crime risk

To achieve this, San UK operates in accordance with the following principles and in accordance with the Anti-Money Laundering (AML) and Sanctions Policies and Standards:

Customer Onboarding

* Assess all customers for their financial crime risk and assign a risk rating using an appropriate Customer Risk Assessment (CRA) system[[1]](#endnote-1). Risk ratings are determined using a detailed calibration methodology approved by senior members of the Financial Crime Compliance Team (FCCT).
* Once a risk rating is assigned, obtain all required documentation. As a minimum the documentation must meet the requirements of the San UK AML Policy and Standards.
* Screen all new to bank clients and changes to existing customer data against appropriate sanctions lists. Sanctions lists that must be screened against as a minimum are set out in the San UK Sanctions Policy and Standards.
* Screen all new to bank clients and changes to existing customer data against lists of known Politically Exposed Persons (PEPs) and their relatives and close associates (RCAs);
* Bring the highest risk new customers to the Financial Crime Onboarding & Exits Forum (OBE) in order to determine whether to onboard the client or decline the relationship.

Ongoing Reviews

* Undertake periodic reviews in accordance with the customer’s risk rating and event driven reviews at key trigger events.

Payment Screening

* Filter all incoming and outgoing payments against appropriate sanctions lists[[2]](#endnote-2).

Transaction Monitoring

* Monitor customer activity to identify potential suspicious behaviour. All business units are required by the AML Policy and Standards to undertake ongoing transaction monitoring. The Suspicious Activity Reporting Unit (SARU), a specialist unit within FCCT, undertakes centralised transaction monitoring in line with agreed scenarios.
* Submit suspicious activity reports to the National Crime Agency (NCA) as appropriate.

Customer Exits

* Utilise a consistent and streamlined approach to the termination of client relationships.

1. Where CRA is available. Where CRA is not available a manual risk rating system is normally utilised [↑](#endnote-ref-1)
2. In line with the process for Customer Screening set out in Customer Onboarding [↑](#endnote-ref-2)