

Money Laundering and Terrorist Financing Policy Overview

2022

The **co-operative** bank

Money Laundering and Terrorist Financing

The Co-operative Bank is committed to mitigating the Money Laundering and terrorist financing risks it faces by establishing and implementing a Board approved Anti Money Laundering (AML) Policy. Our AML Policy is underpinned by mandatory minimum standards, which drive internal controls for managing our AML, financial sanctions (FS) and counter terrorist financing (CTF) risks. This provides a framework to protect the Bank and our customers from the harms of financial crime.

The Bank has zero tolerance for money laundering, terrorist financing or the circumvention of financial sanctions and will not knowingly do business with or facilitate the activities of individuals or entities that it believes to be engaged in these. The Bank has no appetite for actions that result in a breach of legal or regulatory requirements leading to censure or financial penalty. This applies to all business units and functions within the Bank, all employees, and those organisations working on behalf of the Bank including Third Parties.

The Bank has an appointed Money Laundering Reporting Officer (MLRO) who ensures the Bank identifies, assesses and understands the ML, TF and FS risks to which we are exposed and also ensures the Bank takes the appropriate mitigation measures to protect our customers and other stakeholders. The Bank has customer due diligence and identification and verification procedures in accordance with its legal and regulatory obligations.

Training is a key element of our commitment to mitigate ML, TF and FS risks and all new joiners are provided with specific training prior to commencing their duties. Existing colleagues are provided with mandatory AML training and assessment on an annual basis and those colleagues whose role carries an elevated risk of ML, FS and / or TF receive more specific training and assessment. Records of training are retained in line with record retention requirements and training material is reviewed on an annual basis.