



FBNBank



## You and your money

Helping you understand your account

# Anti-money laundering

## How you can help

If you are opening an account or entering into a business relationship with us for the first time we are required by law to ask you for proof of your name and residential address. If the relationship is with a company or other type of business, we are also required to identify the business, business address and if appropriate the significant shareholders in the business. This is to ensure we comply with the current money Laundering regulations and to help prevent criminals using financial services to launder their money.

These regulations are designed to help combat crime and to protect our customers from fraud.

The main aim of a money launderer is to integrate the money made from their illegal activities into the banking system so it can't be traced back by the authorities. A common way of achieving this is to use a false name and address, **possibly your name and address!**

Once the money is in the banking system the criminal has succeeded in his first aim and has made it more difficult to track down and confiscate.

As mentioned above, for business accounts or joint accounts we may need to identify other persons who are party to the account **or are beneficial owners in the case of business accounts.**

## What is money laundering?

Money laundering is the means used by criminals to disguise the money they make from their crimes.

The term laundering is used because criminals seek to turn 'dirty' money into 'clean' money to use without generating suspicion. Once it is in the financial system it is far harder to trace its history and be able to confiscate.



## Checking your identity

When you open an account or begin a business relationship with us we will require evidence of your identity, date of birth, and residential address. By doing this we can make it as difficult as possible for criminals to falsely use your details to open an account.

## What details will we require?

An individual will be asked to provide the following information:

- Full name
- Date of birth
- Nationality
- Residential address
- Occupation
- Value and source of funds expected into your account

If the account to be opened is a business account we will require the following information:

- Name of company or business
- Address of company or business
- Names of all directors and signatories to the account
- Names of all significant shareholders together with the percentage held
- Names of significant customers
- Countries with which you deal
- Types of payment methods to be used

# Anti-money laundering Continued

## Documentary proof

We will require proof of a number of these details by means of documentary evidence. The types of documents we will require are common to most individuals and businesses so you shouldn't have any difficulty in producing them. The most common documents that are acceptable are listed below.

We require to meet prospective customers face-to-face and all we need is to sight originals of two separate documents, one from each list below. We will take copies and give them back to you immediately. **We would ask you to note that you can't use the same document to confirm both your name and address.**

To confirm your name:

- Current full signed passport
- Current photocard driving licence
- Current national identity card

To confirm your address:

- Current photocard driving licence
- Recent (dated within three months) utility bill (not including mobile telephone bill)
- Recent bank/building society/credit card statement or passbook
- Current personal tax or council tax bill
- Current tenancy agreement with a commercial institution

These are the documents we would normally expect to see but if you are unable to provide one of these please speak to our staff so that an alternative can be agreed.



There are a number of people who have good reasons for not being able to provide some or all of the documents highlighted above. If they have never been abroad they would have no reason to have a passport; have never driven a car, or all household bills are in their spouse's name. We will then look for an alternative document that will perform the necessary function and will enable your account to be opened.

### Your peace of mind

The steps we take when opening an account may seem onerous but they are a legal requirement. If, for whatever reason, you are unable to provide satisfactory proof of your identity we are not allowed to open an account for you.

This does not mean there is any suspicion falling on you. This information is needed simply to reconfirm your identity in order to make it more difficult for criminals to use a stolen or false identity to turn their 'dirty' money into 'clean' money.

These extensive checks are therefore carried out for not only your own protection but also your peace of mind.

You are asked to note that we may record telephone conversations in order to offer you additional security and to improve our service standards.

Conversations may also be recorded for the purpose of staff training.

# Looking after your money and protecting your account

## Working with our customers in the fight to beat crime.

The care of your cheques, cards, pins and other security information is essential to help protect your accounts. Please make sure that you follow the advice shown below:

- If you tell us that your cheque book or card has been lost or stolen, or that someone else knows your PIN or any other form of Security information, we will take immediate steps to try and prevent them from being used.
- Do not keep your cheque books and cards together.
- Do not allow anyone else to use your card, and do not tell anyone else your PIN, Password or any other security information.
- If you change your PIN, you should choose your new number carefully.
- Try to remember your PIN, password and other security information, and destroy the notice as soon as you receive it.
- Never write down or record your PIN, password or other security information.
- Always take reasonable steps to keep your card safe and your PIN, password and other security information secret at all times.
- Never give your account details or other security information to any one unless you know who they are and why they need them.
- Keep your card receipts and other information about your account containing personal details (for example, statements) safe and get rid of them carefully.
- Take care when storing or disposing of information about your accounts. People who commit fraud use many methods such as 'bin raiding' to access this type of information. You should take simple steps such as shredding printed material.
- You will find the APACS website [www.cardwatch.org.uk](http://www.cardwatch.org.uk) a helpful guide on what to do if you suspect card fraud.



## Cheque fraud:

- When you write a cheque, it will help to prevent fraud if you clearly write the name of the person you are paying the cheque to and put extra information on the cheque (a reference for example), especially if you are not personally paying a cheque in (for example, sending a cheque by post).
- If you are paying a cheque to a large organisation such as the Inland Revenue, do not make the cheque payable simply to that organisation. Add further details into the payee line (for example, Inland Revenue, re J Jones, your ref xyz). You should draw a line through unused space on the cheque so unauthorised people cannot add extra numbers or names. Please also adopt this approach when making a cheque payable to a bank or building society.
- These provisions are designed to prevent, as far as possible, cheques being intercepted in the post and paid into the wrong account. The more details about the true payee and the fewer empty spaces on the cheque, the less likely it is to be tampered with and used fraudulently.

## Online banking:

Online Banking is safe and convenient as long as you take a number of simple precautions. Please make sure that you follow the advice given below:

- Keep your PC secure. Use up-to-date anti-virus and spyware software and a personal firewall.
- Keep your passwords and PINS secret.
- Treat e-mails you receive with caution and be wary of e-mails or calls asking you to reveal any personal security details. Neither the police nor we will ever contact you to ask you to reveal your online banking or payment card PINs, or your password information.

## Summary

Work with us to help keep your details and money safe – let us know as soon as you become aware of anything suspicious, no matter how minor you think it is. Remember when it comes to protecting your money and your personal information you can never be too careful.

# Helping our customer understand our complaints procedure

FBN Bank (UK) Ltd is committed to providing a fast and efficient service for its customers, and to keeping errors down to a minimum. In order to achieve this, the Bank uses the most up-to-date technology and employs well-trained, dedicated staff.

Unfortunately there may be occasions when we will fall below our high standards, whether it is a delay in processing a transaction or an error while processing a transaction. The Bank realises the distress such an event can cause and has implemented a procedure designed to minimise the inconvenience to its customers.

*The Bank's policy is to ensure that all complaints are treated fairly and sympathetically. In addition complaints will be registered and monitored by an appointed person to ensure the customer is kept informed on a regular basis and that a final response is sent as soon as possible.*

A member of staff will be designated to handle the complaint and the customer will be advised of this person's name so they have a definite point of contact. Whenever possible the designated Account Officer will not have been involved in the transaction or situation that triggered the complaint.

Customers are invited to contact this person if they have any questions, queries or if they wish to enquire about the progress of the complaint.

It should be pointed out however that any complaints concerning old transactions might require records to be retrieved from the Bank's archive. This may lead to a delay before the complaint can be resolved, but the Bank will keep the customer fully informed and give an anticipated date that the information should be available. Once the information is received the Bank will be in a position to give an expected date by which the complaint can be resolved.



Once a complaint has been received, whether in writing or verbally, it will be 'logged-in' and an Account Officer designated. At this stage the Account Officer will clarify any points that are not clear in order that the exact nature of the complaint is understood.

If the complaint can be resolved by the close of business the next day, a final response will be sent to the customer at that time. If early settlement of the complaint is not possible then an acknowledgement will be sent to the customer within 5 business days of receipt of the complaint. This communication will include the name and title of the member of staff handling the complaint together with a copy of this complaints procedure.

A further written communication, either in the form of a final response or holding response, will be sent to the customer within 4 weeks of having received the complaint. In the event of a holding response the Bank will explain why it is not in a position to resolve the complaint and indicate when a further communication will be sent. The Bank will also give an indication when they expect to be in a position to give a final response.

*The Bank will send a final response or further response within 8 weeks of receiving the complaint. If the communication is not a final response, the Bank must advise the customer why the complaint has not yet been resolved and state an anticipated final response date. If further response are required before the complaint is settled, the Bank will ensure they are sent within reasonable time limits that are communicated to, and if necessary agreed with, the customer.*

Should the customer be dissatisfied with the handling of a complaint at any time, they should inform the Bank by letter addressed to The Head of Compliance who will investigate the matter and ensure a response is sent within 5 business days from receipt of the customer's letter.

# Helping our customer understand our complaints procedure Continued

*If you are still dissatisfied, you can contact the Financial Ombudsman Service 'FOS' within 6 months of the date of our final response letter. The FOS was set up by the Financial Services Authority principally to review unresolved complaints from personal customers or business customers/ organisations with an annual turnover of less than £1m.*

*We can inform you if we judge you are eligible to refer your complaint to the FOS. We would mention this is for the FOS to decide and they can be contacted directly at:*

## **The Financial Ombudsman Service**

South Quay Plaza, 183 Marsh Wall, London E14 9SR

Telephone: 0845 080 1800

E-mail: [Enquiries@financial-ombudsman.org.uk](mailto:Enquiries@financial-ombudsman.org.uk)

Website: [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk)

The correct and efficient handling of complaints is important to the Bank and should customers have any comments we would welcome them. Such comments should be put in writing and addressed to The Head of Compliance.



Contact us in London, Paris or Nigeria

**London**

28 Finsbury Circus, London EC2M 7DT  
Tel. (44) 20 7920 4920 Fax (44) 20 7920 4970

**Paris**

5 bis rue du Cirque, 75008 Paris, France  
Tel. (33) 1 53 53 20 40 Fax (33) 1 53 53 07 33

**Nigeria**

No 6, Sixth Street, Osborne Foreshore Estate, Ikoyi, Lagos, Nigeria  
Tel. (234) 14611384 Fax (234) 12665934



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Authorised and Regulated by the Financial Services Authority