

## SMF Job Description

<b>Job Title:</b>	<b>Money Laundering Reporting Officer (MLRO)</b>
<b>Reports to:</b>	Chief Executive Officer
<b>Business Unit:</b>	Compliance
<b>Direct Reports:</b>	FC Advisory, Transaction Monitoring & Screening team (7)
<b>Senior Manager Function(s):</b>	SMF17 Money Laundering Reporting Officer
<b>Budget Responsibility:</b>	Yes
<b>Group Collaboration Contact:</b>	Chief Compliance Officer, First Bank Nigeria

The group collaboration relationship has been established across FBN Bank (UK) and First Bank of Nigeria to encourage and create synergies in our value chain and risk focused culture, by sharing innovative ideas and best practice methodologies to develop a holistic approach in the execution of our business strategy.

### Purpose of role:

To design and maintain an appropriate compliance function for FBN Bank UK that delivers second line of defense capability, providing check and challenge to bank's delivery against its regulatory commitments.

To take responsibility for the firm's processes and procedures for countering the risk that the firm may be used to further financial crime.

To act as a Money Laundering Reporting Officer.

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### Regulatory Prescribed Responsibilities:

- d) Responsibility for the firm's policies and procedures for countering the risk that the firm may be used to further Financial Crime.

### Primary Responsibilities of Role:

**Compliance Strategy/Risk Appetite:** In conjunction with the Board and Executive Management Committee provide input and recommendations to strategically control and oversee the management of the Bank's Financial Crime Risk Framework in support of the business.

- Oversee the production, delivery and review of the Compliance function's annual plan on matters relating to Financial Crime.
- Cascade compliance strategy, mission, risk appetite and initiatives to direct reports and business partners

**Leadership:** Lead the Compliance functions' Financial Crime team in accordance with the firm's values in delivering the firm's vision and strategy. To lead in the creation of a Compliance vision that enhances the bank's control environment.

- Act in harmony with the behaviors detailed in the Bank Competency Framework, vision and strategy
- Allocate and delegate clearly and effectively. Provide effective support to the team

### Collaboration

**Compliance Framework:** Establish and maintain effective compliance framework with appropriate policies, processes, procedures and controls that enhances the control environment in relation to managing financial crime risk.

**Risk management:** Mitigate financial crime risk and support the mitigation of key elements of the bank's risk profile in respect of financial crime risk. Manage financial crime risk ensuring that the bank delivers correctly against its regulatory commitments. Designs, manages and maintains Key Performance Indicators and Key Risk Indicators in relation to



Compliance in collaboration with the Head of Compliance. Reports potential risk issues to CARMCO, EMC, BARAC and Board.

**Regulatory Relationship:** Support the CEO to manage an open and transparent relationship with the Bank's Regulators on matters relating to financial crime risk.

**Compliance Reporting and Standards:** Ensure provision of appropriate, timely and accurate reporting and management of information internally and externally in accordance with the relevant regulatory and internal policy requirements. Maintain record keeping standards and requirements on matters of compliance in relation to auditors, regulators and government agencies.

**Compliance Advisory:** Through the Horizon Scanning process identify changes to key rules, regulations, FCA thematic reviews (best practices) and legal provisions applicable to the Firm's lines of business; and perform where required analyses of impact on such change(s). Provide the business with advisory support during the implementation of any associated change.

Review and update Compliance policies as necessary. Advise on the adequacy of business policies and procedures in relation to Financial Crime.

**Annual Business Risk Assessments for Financial Crime and Anti Bribery and Corruption (BRAs)** - Prepare the annual BRAs in collaboration with the Head of Compliance and Business, using findings and lessons learned from the M&T reviews to develop a global picture of risk and controls of the Bank.

**Compliance Culture, Advice and Training:** Drive the compliance culture change by providing advisory and training services that increase risk awareness and strengthens the firm's ability to manage financial crime risk.

Work with HR and other business partners providing advice and guidance to develop the programme setting of targeted face to face compliance training and assist with the selection of external computer-based training, providing a specific advisory service on core compliance training material associated with the SMF 17 function.

**Human Resources/Talent Management:** Maintain the ongoing competence of the team, building up skill and knowledge. Support diversity and encourage an inclusive environment that fosters talent. Identifies, develops, coaches and nurtures talent to create a pool of future leaders in Compliance.

**Governance:** Maintain effective governance arrangements to ensure running of a well-controlled business. For specific committee responsibilities, including Compliance and Risk Management Committee, and delegation please refer to **FBN (UK) Limited Governance Structure & Principles Manual**.

**Representation:** Promote FBN Bank (the bank) as a serious and trustworthy player, and its Compliance capability as standard setting in the industry.

- Develop strong, professional relations with regulatory authorities and other relevant stakeholders (including FBN Board, clients, advisors, trade bodies, financial markets).
- Maintain a network of fellow Compliance Professionals in the banking industry to ensure knowledge is up to date and maintained to a high level.

SMF 17 is accountable and responsible for *ownership & management* (from a First Line of Defense / 1LOD perspective) in respect of the following Risk Categories:

- Operational Risk and Reputational Risk (in his/her Department of oversight).

### Committee Participation:

- **Member:** Compliance and Risk Management Committee (CARMCO), Financial Crime Prevention Committee, Executive Management Committee (EMC)
- **Invitee:** Board Audit & Risk Assessment Committee (BARAC), Strategy Advisory Forum

### Conduct Requirements:

#### Individual Conduct Rules:

**Rule 1:** You must act with integrity.

**Rule 2:** You must act with due skill, care and diligence.

**Rule 3:** You must be open and cooperative with the FCA, the PRA and other regulators.

**Rule 4:** You must pay due regard to the interests of customers and treat them fairly.

**Rule 5:** You must observe proper standards of market conduct.

#### Senior Manager Conduct Rules:

**SM1:** You must take reasonable steps to ensure that the business of the firm for which you are responsible is controlled effectively.

**SM2:** You must take reasonable steps to ensure that the business of the firm for which you are responsible complies with relevant requirements and standards of the regulatory system.

**SM3:** You must take reasonable steps to ensure that any delegation of your responsibilities is to an appropriate person and that you oversee the discharge of the delegated responsibility effectively.

**SM4:** You must disclose appropriately any information of which the FCA or PRA would reasonably expect notice.

### Competence Requirements:

#### Professional/Academic Qualifications:

Essential: Graduate with university degree ideally with a professional qualification as a lawyer or accountant.

#### Experience/Knowledge

A minimum of 10 years international banking/financial services experience with evidence of governance, risk and compliance responsibilities.

#### Leadership:

People Leader demonstrating energy, inspiration and passion to motivate others.

Strategic thinker.

Ability to build team.

#### Functional/Technical Skills:

Possesses a broad understanding of all conduct rules and financial crime regime and a deeper understanding of how the rules are applied in the operation of the role.

Detailed understanding of the non-financial regulatory obligations of the Bank, in relation to Senior Manager Function holders under the FCA/PRA Senior Manager Regime (SMR) including Statement of Responsibilities, Conduct Rules, Fitness & Propriety standards and assessment.

Ability to successfully manage change projects with commitment with continuous process improvement.

Has comprehensive knowledge and understanding of UK Regulatory framework.

#### Interpersonal Skills:

Articulate communicator, engaging at senior level with clients and international organisations.

#### Languages: (if applicable)

English fluency spoken and written.

### Competencies:

There are *six core behavioural competencies* applicable to every member of staff as part of FBN's Performance Management Framework and are fundamental to the way in which we operate. The level of behaviour required for your role is detailed below and the full range of descriptors for each level is available in the Competency Framework Booklet.

	Competency	Level
1	Professionalism	4
2	Client Focus	4
3	Decision Making & Accountability	4
4	Working with Others	4
5	Change Orientation	4
6	Risk Awareness	4
7	Leadership	see Competency Framework

Signed:

Date: