

**Details of selected fines imposed on financial institutions with a presence in the UK for tax fraud, money laundering and financial crime systems and control offences**

<b>Corporation</b>	<b>Conduct</b>	<b>Fine</b>
<b>United Kingdom</b>		
Barclays 2016	<p>Fined by the Financial Conduct Authority (FCA) for failing to ensure sufficient financial crime risk mitigation for high volume transactions but report found no criminal involvement of the bank.</p> <p>Further investigations pending.</p>	<b>£72 million</b>
Deutsche Bank 2017	<p>Fined by the FCA for failing to maintain adequate anti-money laundering (AML) control framework between 2012 -2015.</p> <ul style="list-style-type: none"> <li>• performed inadequate customer due diligence</li> <li>• failed to ensure that its front office took responsibility for the CB&amp;S division's Know Your Customer obligations</li> <li>• used flawed customer and country risk rating methodologies</li> <li>• had deficient AML policies and procedures</li> <li>• had an inadequate AML IT infrastructure</li> <li>• lacked automated AML systems for detecting suspicious trades</li> <li>• failed to provide adequate oversight of trades booked in the UK by traders in non-UK jurisdictions</li> </ul>	<p><b>£163 million</b></p> <p>This is the largest fine for AML failings imposed by the FCA.</p>
Sonali 2016	<p>Fined and prevented from accepting deposits from new customers for 168 days. The FCA found serious and systemic weaknesses which affected almost all levels of its AML control and governance structure, including its senior management team, its money laundering reporting function, the oversight of its branches and its AML policies and procedures.</p>	<b>£3.25 million</b>

<b>United States</b>		
Credit Suisse	Concealed assets and helped customers to maintain undeclared bank accounts. Set up sham entities and foundations offshore.	<b>\$2.5 billion</b>
UBS 2009	Helped US clients to hide their taxable income and assets offshore.	<b>\$780 million</b>
Société General Private Banking (Suisse) SA 2015	Helped US taxpayers to hide money in foreign accounts and evade tax obligations. Methods included registering assets under names of non-US entities and concealing beneficial ownership using BVI registered corps. Other methods included transferring money into the form of gold to avoid reporting requirements and using numbered accounts to conceal identities. Cooperated with US-DOJ under Swiss Bank Program to avoid criminal proceedings.	<b>\$17 million</b>
BNP Paribas 2015	Opened and maintained accounts for U.S. taxpayers in the name of non-U.S. corporations, foundations, trusts or other legal entities, in which U.S. taxpayers concealed their beneficial ownership of the accounts. Readily accepted accounts in which external trust companies created and administered offshore structures incorporated or based in offshore locations such as tax havens.	<b>\$59 million</b>
Coutts (RBS) 2015	Opened, serviced and profited from accounts for U.S. clients who Coutts knew or had reason to know were likely not complying with these obligations. Aided and assisted certain U.S. clients with undeclared accounts at Coutts to evade their income taxes by placing their assets in the names of structures formed, maintained and managed by various subsidiary trust companies of Coutts. Coutts has operated its own trust companies in Liechtenstein and Switzerland. For numerous such accounts, Coutts relationship managers and other employees knowingly accepted bank documents	<b>\$78 million</b>

	provided by the directors of the offshore companies that falsely represented under penalty of perjury that such companies were the beneficial owners, for U.S. income tax purposes, of the assets in the Coutts accounts.	
<b>Singapore</b>		
Standard Chartered	Significant lapses in the bank's customer due diligence measures and controls for ongoing monitoring, which resulted in numerous breaches of Monetary Authority of Singapore's (MAS) AML regulations. The control lapses stemmed from inadequacies in policies and procedures, insufficient independent oversight of front office staff, and a lack of awareness of money laundering risks among some bank staff.	<b>\$5.2 million</b>
Coutts	Breached AML requirements in relation to customer due diligence measures for politically exposed persons (PEPs). The relationships for these PEP customer accounts were established between 2003 and 2009. The failure to exercise the necessary enhanced due diligence on these accounts was the result of actions or omissions of certain officers who have since left the bank.	<b>\$2.4 million</b>
Falcon Bank	Following on from deficiencies identified in a 2013 inspection, MAS found an even large number of breaches of AML requirements. The breaches include failures to adequately assess irregularities in activities pertaining to customer accounts, and file suspicious transaction reports.	<b>Bank prohibited from operating in Singapore (loss of "merchant bank" status) plus fined \$4.3 million</b>
UBS	There were deficiencies in the on-boarding of new accounts, weaknesses in corroborating the source of funds, inadequate scrutiny of customers' transactions and activities, and failure to file timely suspicious transaction reports.	<b>\$1.3 million</b>

<b>France</b>		
Reyl	Geneva-based Reyl bank was found guilty of “being an instrument for the concealment of assets” by the French court and received the maximum fine possible for money laundering. However, the bank escaped a ban on operating on French soil as demanded by the prosecution. Besides the bank, banker François Reyl was also fined €375,000 and given a two-year suspended sentence.	<b>1.875 million euros</b>
UBS	Fined by French regulator. UBS failed to prevent the authorisation by staff to transmit lists of prospective clients interested in opening undeclared overseas bank accounts.	<b>10 million euros (under appeal)</b>
<b>Germany</b>		
LGT bank (Lichtenstein state owned bank)	Prosecutors suspended proceedings after the bank agreed to a settlement.	<b>46 million euros</b>
Coutts	Paid to German prosecutors covering a period between 2004-2014 after admitting aiding and abetting client tax evasion through its Swiss arm.	<b>23.8 million euros</b>