



FINANCIAL CRIME COMPLIANCE CONFERENCE 2024 DELEGATE INFORMATION

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FINANCIAL CRIME COMPLIANCE CONFERENCE 2024

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DELEGATE INFORMATION

A. ARRIVAL INSTRUCTIONS

We are delighted to welcome you to the AFB Financial Crime Compliance Conference 2024, which is being held on Wednesday 27 November 2024, 09:00 to 16:00 (arrivals and registration from 08:30). The Conference is sponsored by **ComplyAdvantage**, hosted by **A&O Shearman** and supported by **Avyse Partners** and **The Great Chatwell Academy**.

The conference is taking place at A&O Shearman, One Bishops Square, London E1 6AD. Please see [here](#) for directions.

On arrival, please go down the escalators next to the AFB banner and report to the AFB team at reception, where you will be directed to the conference auditorium.

There will be open Wi-Fi available throughout the day using 'AO Wifi' (no password required).

For any questions, please email secretariat@foreignbanks.org.uk

B. MAKING THE MOST OF EACH SESSION

All sessions will be held under the Chatham House Rule. The panel sessions will be video recorded and shared with registered delegates as well as made available in the members' area of AFB's website.

Please note that this delegate brochure will not be available in print on the day – it will be accessible via a QR code on screens at the conference. If you would prefer a printed copy, please bring a copy with you.

C. HOW TO INTERACT/ASK QUESTIONS

During each session, there will be an opportunity to ask questions. Attendees should raise their hand to ask a question and wait for a microphone to be passed to them. Once you have received the microphone, please state your name and company, ask your question and hand the microphone back to the staff member. Please note there may not be adequate time for the panelists to answer all questions. Please feel free to contact AFB after the conference and we will pass your questions to the appropriate panelist for any follow-up discussion.

D. CONFERENCE AGENDA

08:30 – 09:00	Registration, Refreshments and Networking
09:00 – 09:10	<p>Welcome</p> <p><i>Giles French, Association of Foreign Banks, CEO</i></p> <p><i>Sarah Hitchins, A&O Shearman, Partner</i></p>
09:10 – 09:45	<p>Keynote Address and Q&A</p> <p><i>Andrew Wigston, Financial Conduct Authority, Head of Financial Crime</i></p> <p><i>Moderated by Andrew Brooke, Association of Foreign Banks, Director of Policy and Regulatory Affairs</i></p>
09:45 – 10:45	<p>Harmonising Agendas - Aligning the FCA's Priorities with its Financial Crime Objectives</p> <p>Panel Discussion and Q&A</p> <p><i>Clive Gordon, Sicsic Advisory, Practice Lead, Financial Crime (formerly Head of Department – Financial Crime Supervision & Policy at the FCA)</i></p> <p><i>Richard Snookes, British Arab Commercial Bank, Chief Compliance Officer & MLRO</i></p> <p><i>Chaired by Marc Teasdale, A&O Shearman, Managing Director, Consulting</i></p> <p>This session will consider the alignment of the FCA's priorities with its financial crime objectives. This session will consider how these priority areas can be reconciled, with a focus on:</p> <ul style="list-style-type: none"> • the interplay between Consumer Duty and Financial Crime obligations • the role of Operational Resilience in strengthening financial controls • risk culture • the potential effects on the UK's international competitiveness, in light of the new secondary objective • the benefits and risks of the use of AI and Data • the FCA's 'assertive supervisory approach'

	<p>Background/resources</p> <ul style="list-style-type: none"> • FCA 2022-25 strategy (see page18 for section on tackling financial crime) • FCA CP24/9 'Financial Crime Guide Updates' (March 2024) • Sarah Pritchard (FCA, Executive Director, Markets and Executive Director, International) speech on 'A targeted and outcomes-based approach to tackling financial crime' (September 2024)
10:45 – 11:15	<p>Refreshments and Networking</p>
11:15 – 12:15	<p>Sanctions Strategy: Anticipating the Next Wave</p> <p>Introductory remarks by <i>Iain Armstrong, ComplyAdvantage, Regulatory Affairs Practice Lead</i></p> <p>Panel Discussion and Q&A</p> <p><i>Luke Jewell, Office of Financial Sanctions Implementation (OFSI), Head of Enforcement</i></p> <p><i>Iain Armstrong, ComplyAdvantage, Regulatory Affairs Practice Lead</i></p> <p><i>Richard Wall, İşbank, UK MLRO</i></p> <p><i>Chaired by Zia Ullah, Eversheds Sutherland, Partner, Head of Corporate Crime & Investigations</i></p> <p>Sanctions have become a critical tool in the global regulatory arsenal. This session will:</p> <ul style="list-style-type: none"> • forecast the upcoming developments in sanctions policy • identify the trends financial institutions need to prepare • discuss the FCA's current areas of focus in managing sanctions risk • compare and contrast FCA and Office of Financial Sanctions Implementation (OFSI) approaches to managing sanctions risk • provide actionable strategies for compliance professionals to stay ahead of the curve <p>Background/resources</p> <ul style="list-style-type: none"> • Deter, disrupt and demonstrate - UK sanctions strategy in a contested world: UK sanctions strategy (UK Foreign, Commonwealth and Development Office, February 2024) • OFSI Enforcement Actions • FCA key findings from its assessments of sanctions systems and controls in financial services firms (September 2023)

12:15 – 13:15	<p>Unveiling the State of AML/CTF Regulation: Trends, Challenges, and Future Directions for International Banks</p> <p>Panel Discussion and Q&A</p> <p><i>Jose Arevalo, Commerzbank, Director, Regulatory Risk & Control Oversight</i> <i>Kathryn Westmore, Royal United Services Institute (RUSI), Senior Research Fellow</i></p> <p><i>Chaired by David Rundle, BCLP, Partner</i></p> <p>This session will focus on the state of the UK and EU’s AML/CTF regulatory eco-system for international banks, covering the status quo and assessing the future direction.</p> <p>Specifically:</p> <ul style="list-style-type: none"> • the pursuit of effectiveness and the ‘Risk Based Approach’, the Financial Action Task Force (FATF) consultation on AML/CTF and Financial Inclusion, and HM Treasury’s consultation on Improving the effectiveness of the MLRs • the FCA’s PEPs review • proposals for reforming UK AML and CTF supervision – implications for firms and enhancing effectiveness • the future of EU AML/CTF regulation following the AMLA Regulation, AML Regulation and 6th AML Directive, which were published in the official journal on 19 June 2024, and work towards AMLA starting operations in the Summer of 2025 <p>Background/resources</p> <p>FATF changes to its grey listing criteria (October 2024)</p>
13:15 – 14:00	<p>Networking Lunch</p>
14:00 – 15:00	<p>Beyond the Headlines - Dissecting Thematic Failures in FCA’s Supervisory Enforcement Measures and Notices in Financial Crime</p> <p>Panel Discussion and Q&A</p> <p><i>Matt Russell, Avyse Partners, Senior Executive, Financial Crime Practice</i> <i>Imogen Makin, WilmerHale, Counsel</i> <i>Adam Jamieson, Ashurst, Partner</i></p> <p><i>Chaired by Sarah Hitchins, A&O Shearman, Partner</i></p> <p>The session will consider the impact of the recent FCA supervisory enforcement measures in the area of financial crime, such as:</p> <ul style="list-style-type: none"> • analysis of the lessons learned from recent Section 166 reviews • the strategic use of Voluntary Requirement Notices (VREQs) in cases involving financial crime issues

	<ul style="list-style-type: none"> the anatomy of supervisory action and enforcement investigations to understand their implications for financial institutions <p>The session will also consider the thematic failures and root causes that have emerged from recent FCA Enforcement Notices, including:</p> <ul style="list-style-type: none"> uncovering the less obvious but critical failures actions you should already be taking as an organisation to mitigate risks already highlighted by the FCA the extent of individuality accountability under the UK regime <p>Background/resources</p> <ul style="list-style-type: none"> FCA Final Notice – Starling Bank Limited (September 2024)
15:00 – 16:00	<p>The Economic Crime and Corporate Transparency Act 2023 and the ‘Failure to Prevent Fraud’ Offence</p> <p>Panel Discussion and Q&A</p> <p><i>Eve Giles, A&O Shearman, UK Head of Investigations & White Collar</i></p> <p><i>Alex Jayne, Serious Fraud Office (SFO), Case Controller</i></p> <p><i>Penny Dunbabin, Home Office, Senior Policy Lead</i></p> <p><i>Chaired by James Lovatt, Chief Compliance Officer and MLRO, Santander UK Branch</i></p> <p>The session will review the implications of the ECCT Act for businesses and dissect best practices for failure prevention. This entails:</p> <ul style="list-style-type: none"> a discussion on the pragmatic view of the impact of the legislation on regulated entities considering potential pitfalls of the legislation – what areas require most consideration by organisations a conversation on the focus of relevant agencies, including the SFO and Home Office providing examples of good practice from peers <p>Background/resources</p> <p>Guidance - Offence of 'failure to prevent fraud' introduced by ECCTA (Published by the Home Office in November 2024)</p>

E. SPEAKER BIOGRAPHIES

Giles French, Association of Foreign Banks, CEO



Giles French was appointed Chief Executive of the Association of Foreign Banks (AFB) in September 2022. He is responsible for all areas of the AFB's programme of activities and represents the views of the international banking community to UK policy makers and regulators.

Prior to joining the AFB, Giles was a Director in the financial and professional services team at the City of London Corporation. He worked on financial services regulation and competitiveness policies and promoted London as an international financial centre in major global markets. He led the Technology and Skills Policy teams and was responsible for relationships with major financial and professional services firms based in the UK. He represented the City of London Corporation on the Boards of Innovate Finance and the Financial Services Skills Commission and was a Trustee of the charity Heart of the City.

Giles has over 20 years of experience in corporate affairs, government relations and public policy. He has developed and implemented corporate strategies; provided strategic advice to senior executives; and engaged with politicians, regulators and business leaders on a wide range of public policy issues.

He studied at the University of York and has a BA in Politics, Philosophy and Economics.

Sarah Hitchins, A&O Shearman, Partner



Sarah specialises in advising clients on regulatory and internal investigations involving the most high-profile and sensitive issues, which typically attract the highest levels of scrutiny from regulators, the media and politicians.

She has significant experience of advising on and conducting UK and cross-border investigations involving a broad range of issues, including market abuse, insider trading, financial crime (civil and criminal), cyber and data security breaches, individual accountability, operational resilience, fund liquidity issues, misselling, environmental disclosures and 'greenwashing', systems and controls failures, whistleblowing, cultural issues and non-financial misconduct (including, in particular, allegations of bullying, harassment, discrimination and sexual misconduct).

Sarah has a notable focus on representing clients that are involved in regulatory investigations, including in particular investigations conducted by the UK Prudential Regulation Authority (PRA) and Financial Conduct Authority (FCA), where she previously completed a secondment in its Enforcement Division. Sarah has also represented a number of clients in investigations concerning compliance with UK Listing and Takeover Code requirements.

Alongside her investigations practice, Sarah has advised over 200 clients in relation to the UK Senior Managers and Certification Regime (SMCR). Her advice spans issues relating to both the implementation and post-implementation operation of the SMCR, in addition to assisting candidates with preparations for their Senior Manager authorisations interviews with the FCA

and the PRA. Sarah is specifically sought out by clients to advise them on investigations with significant individual accountability considerations, including assessments of fitness and propriety, potential breaches of the FCA and PRA Codes of Conduct and potential adjustments to individuals' deferred remuneration, due to her expertise in these areas.

Sarah has been selected by Global Investigations Review (GIR) as one of the top 100 women in investigations, and she has also been recognised by LegalWeek/Law.com as one of the UK's "Rising Star" female lawyers in recognition of her leading financial services contentious regulatory expertise and experience.

Andrew Wigston, Financial Conduct Authority, Head of Financial Crime



Andrew has been with the UK financial services regulator since 2012 and has previously led the FCA's supervision of Retail Banks and the supervision of retail insurance firms. He has also worked in the FCA's enforcement division (where he led on complex retail investigations). Prior to joining the regulator, he was a partner in a London law firm where he advised financial services firms and other large corporates on regulatory issues and complex disputes.

Clive Gordon, Sicsic Advisory, Practice Lead, Financial Crime



Clive has over 25 years regulatory experience gained working at regulators and advising clients. He has been at the heart of historic regulatory initiatives such as the Financial Conduct Authority's (FCA) Consumer Duty, the joint FCA and HMT Advice Guidance Boundary Review, the FCA's response to the 2022 Russia Sanctions, the development of the FCA's approach to Conduct Risk and the first use of powers under the UK's Competition Act.

Clive has extensive knowledge of the Consumer Investments retail sector having most recently been Head of the Consumer Investments Market Analysis & Policy Department (until August 2023) at the FCA and previously Head of the Retail Investments Department (responsible for supervising firms in the Wealth Managers, Financial Advisers, Platforms, SIPP Operators and Equity Crowdfunding sectors). He has also headed-up the FCA's Financial Crime Department and, prior to the FCA, worked within the Financial Services Authority's Enforcement Division and at the communications regulator Ofcom.

Clive originally qualified as a Barrister and worked in private practice in London and Brussels as an EU and competition lawyer.

Richard Snookes, British Arab Commercial Bank, Chief Compliance Officer and MLRO



Richard joined BACB in June 2022 as Interim Head of Financial Crime Risk and Money Laundering Reporting Officer, he was promoted to Chief Compliance Officer in September 2022.

Having previously worked at Barclays Capital, Santander UK and RBS, Richard is experienced in leading teams responsible for risk monitoring at an international level. Richard is highly competent in managing complex,

specialist risk environments, having served as Chief Compliance Officer at Sberbank CIB in London, where he led a control enhancement programme and restructured the UK office's compliance processes. Richard has worked in financial crime prevention and regulator engagement, which has seen him supervise the deployment of robust controls in both trade finance and correspondent banking contexts.

Richard holds a BSc. from Imperial College London, and an MBA Accreditation from the London School of Economics.

Marc Teasdale, A&O Shearman, Managing Director, Consulting



Marc is a highly experienced ex-regulator with over 20 years of experience at the Financial Conduct Authority and Financial Services Authority, including 15 years at a senior leadership level.

He brings this experience to bear by providing practical strategic advice to the Boards and C-suites of financial services clients on their most important and challenging regulatory issues.

Since joining A&O Shearman Marc has advised clients across the broad spectrum of financial services firms, including banking, insurance, and asset and wealth management. Marc also has an extensive SMCR and governance practice, providing SMCR training to senior management, preparation for SMF regulatory application interviews (including Chair, CEO, CFO, COO and Branch Managers of the largest financial institutions) and advice on firms' implementation of SMCR and their broader governance arrangements. Marc often works alongside colleagues from A&O Shearman's legal practice groups to enable the seamless provision of strategic regulatory and legal advice.

Marc is approved to act as a Skilled Person under Lots B (Governance, Accountability, Strategy and Culture), C (Controls and Risk Management Frameworks) and D (Conduct of Business) of the FCA and PRA Skilled Persons Panel, and has also supported and advised banking and insurance clients where a Skilled Person appointment has been required.

Iain Armstrong, ComplyAdvantage, Regulatory Affairs Practice Lead

Iain Armstrong is a Regulatory Affairs Practice Lead at ComplyAdvantage. Iain has held a number of senior compliance roles in major financial institutions, including NatWest, HSBC, and Barclays. Iain also spent eight years working at the UK's Financial Conduct Authority.

Luke Jewell, Office of Financial Sanctions Implementation (OFSI), Head of Enforcement



Luke Jewell is the Head of Enforcement at the Office of Financial Sanctions Implementation (OFSI), with responsibility for overseeing enforcement of financial and Oil Price Cap sanctions. Luke was previously a Sanctions Enforcement Branch Head in OFSI, and before that a Senior Sanctions Advisor. He has a background in investigations and policing.

Richard Wall, İşbank UK, MLRO



Richard Wall is the Money Laundering Reporting Officer at İşbank, London Branch, responsible for all aspects of financial crime prevention. Richard has been in the financial services industry for over 20 years, with a keen focus of improving best practice. He has presented at SO15's National Terrorist Financial Investigation International Training Course, a programme designed to share UK counterterrorism practices with delegates from all over the world engaged in counterterrorist investigations.

Zia Ullah, Eversheds Sutherland, Partner, Head of Corporate Crime and Investigations



Zia is a Financial Crime Partner and Co-Global Head of the firm's Corporate Crime and Investigations group.

Based in London and Manchester, Zia has worked on financial crime matters both from a legal and compliance perspective since 2006 and on criminal law matters since he qualified in 1999. Since 2020 Zia and his team have supported over 50 of the world's largest financial institutions on complex international sanctions projects in addition to matters relating to Anti-money laundering and Anti-bribery and corruption. Zia was previously the Global Head of Sanctions at Barclays. Zia is a current UK FCA approved "Skilled Person" for Financial Crime.

Zia is a regular speaker at UK Finance, the Association of Foreign Banks, the Anti-money laundering professionals forum and the Association of chartered Anti-money laundering specialists. He has written numerous articles for publications such as Complinet and Thomson Reuters Accelus and has also appeared on BBC radio and TV.

Zia created and is editor of Eversheds Sutherland's Global Sanctions Guide, a comprehensive guide to sanctions compliance in 72 jurisdictions, and is a contributing author to GIR's Guide to Sanctions as well as Anti-money Laundering Compliance for Law Firms published by ARK Group.

Jose Arevalo, Commerzbank, Director, Governance, Regulatory Risk & Control



Jose Arevalo is the Director of Financial Crime & Markets Regulatory Risk & Control at Commerzbank AG, London Branch; having a broad range of grass-roots-to-senior financial crime responsibilities across four international banks. He is a leading industry advocate for international banking in the City of London; undertaking to drive the development of guidance and share best practices to support Firms mitigate financial crime, money laundering and terrorist financing risks within the United

Kingdom and in Europe.

Jose is the Joint Money Laundering Steering Group (JMLSG) Panel Member for the Association for Financial Markets in Europe (AFME), having spearheaded the drafting of Ministerially Approved AML/CTF Guidance for the UK financial services industry covering: Trade Finance;

Wholesale Markets; Brokerage Services to Funds, High Risk Third Countries, and Discrepancy Reporting to the Companies House Register of Overseas Entities.

Jose acts as Chair for the AFB's AML/CTF Money Laundering Reporting Working Group, which seeks to address the most salient AML/CTF topics for AFB Members.

Kathryn Westmore, Royal United Services Institute (RUSI), Senior Research Fellow, Centre for Financial Crime and Security Studies



Kathryn is a Senior Research Fellow at the Centre for Financial Crime and Security at RUSI. She leads the Financial Crime Policy Programme which tracks the implementation and evolution of anti-financial crime policy both in the UK and globally. Her work focuses on anti-money laundering regulation and supervision, the policy response to fraud, corporate criminal liability and the role of new technologies. In 2022, she served as Specialist Advisor to the House of Lords Committee on Digital Fraud.

Prior to joining RUSI, Kathryn spent 15 years at PwC where she worked across the regulated sector, advising institutions on how best to manage their financial crime risks and meet their regulatory obligations.

She has an MA (Hons) in Classics from the University of Cambridge and a LLM in Banking and Finance Law from the University of London. She is a Fellow of the Institute of Chartered Accountants in England and Wales (ICAEW) and a Certified Fraud Examiner (CFE).

David Rundle, BCLP, Partner



David represents individuals and firms facing regulatory enforcement and criminal investigations, with a particular focus on the financial services sector.

His depth of experience across both areas, including his time with the FCA's Enforcement Division, gives him a rare perspective in cases which straddle the regulator's remit and financial crime issues. He has represented clients under investigation for market manipulation, insider dealing and money laundering failings, where both criminal prosecution and regulatory enforcement were potential outcomes. His experience, which spans both FCA and PRA investigations, also extends to systems and controls, miss-selling cases and failures to be open and cooperative.

Outside of financial services, he has acted for clients in several of the major SFO investigations in recent years, including Serco and Petrofac, several of which were cross-border investigations, involving agencies across multiple jurisdictions.

Across all areas of his practice he has particular experience representing senior individuals in high profile cases, where their reputations, livelihoods and sometimes liberty is in jeopardy, including Senior Management Function holders under investigation for failings alleged to have occurred within their specified areas of responsibilities under the SMCR.

David regularly advises clients on financial crime compliance matters.

He has been called to the English Bar and is admitted to the New York Bar.

Matt Russell, Avyse Partners, Senior Executive, Financial Crime Practice



Matt Russell leads the Financial Crime team at Avyse Partners and is a financial crime risk and compliance professional who has extensive advisory and industry experience in the assessment, design and implementation of systems and controls for managing the full spectrum of clients' financial crime risks: money laundering, fraud, bribery and corruption, sanctions compliance, market abuse and tax evasion. He has worked with a wide variety of financial institutions and corporates, sometimes on behalf of the regulator in his capacity as a Skilled Person, as well as being appointed as the FCA's expert in relation to their first criminal prosecution of a bank under the Money Laundering Regulations.

Imogen Makin, WilmerHale, Counsel



Imogen Makin is a senior contentious regulatory lawyer, who has worked on some of the most high-profile regulatory investigations in the post-financial crisis period. She regularly acts for a wide range of financial institutions on both domestic and international investigations involving multiple regulators and government agencies, including: the Department of Justice (DOJ), Serious Fraud Office (SFO), Securities and Exchange Commission (SEC), Commodity Futures Trading Commission (CFTC), Hong Kong Monetary Authority (HKMA), Japan Financial Services Agency (JFSA) and Australian Securities and Investments Commission (ASIC).

She has extensive experience of Financial Conduct Authority (FCA) enforcement investigations, including acting on a dual-track anti-money laundering investigation into anti-financial crime systems and controls, and successfully defended a financial institution in relation to global bribery investigations, as well as representing C-suite directors in FCA enforcement proceedings.

Adam Jamieson, Ashurst, Partner



Adam specialises in advising financial services firms, listed companies and senior individuals involved in internal and regulatory investigations.

Adam has significant experience of representing clients in regulatory enforcement investigations conducted by the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA).

Adam previously spent a year on secondment to the FCA's Enforcement & Market Oversight Division.

During his time at the FCA, Adam worked as an investigator on FCA and PRA investigations into both firms and individuals.

Adam has particular experience of investigations relating to: AML and MLRO responsibilities; misleading or failure to notify regulators; whistleblowing; treating customers fairly; shareholder influence; compliance with the listing rules; exchange of commercially sensitive information; the client money rules; transaction reporting; control of inside information and conflicts of interest;

capital requirements; oversight of outsourcing arrangements and appointed representatives; culture; and non-financial misconduct.

Adam frequently acts for clients in responding to Section 166 FSMA skilled person reviews, thematic reviews and supervisory visits.

He also regularly advises clients on the Senior Managers and Certification Regime, fit and proper assessments, Conduct Rule breach assessments, regulatory notification obligations and complaints handling issues.

Adam has undertaken secondments to both a leading asset management firm and a global insurance company.

He is a member of the Financial Services Lawyers Association and regularly contributes to industry publications on legal and regulatory issues.

Eve Giles, A&O Shearman, Partner



Eve is UK Head of Investigations & White Collar. She has over two decades of experience advising on high profile criminal and regulatory investigations and other corporate crime issues. She has a broad range of expertise, advising on cases involving international and national corruption, tax evasion, antitrust, cartels, money laundering, fraud, insider dealing, market abuse, misleading the market and misconduct in a public office and misconduct in the workplace (including #metoo allegations).

Eve acts for both individuals and corporations across a broad range of sectors including financial services, mining, energy, infrastructure, telecommunications, life sciences, defence, retail, transport, aerospace, commodities, construction and engineering. She is very experienced in acting for senior individuals in high profile investigations, including executive and non-executive directors, GCs and compliance team members, including MLROs. She is also an experienced criminal trial litigator (securing wins in the LIBOR, Operation Elveden, Torex and and BA/Virgin price fixing trials) and has defended a number of cases at trial against the UK SFO, FCA, CPS and the CMA.

Alex Jayne, Serious Fraud Office, Case Controller



Alex Jayne is a Case Controller and Prosecutor at the United Kingdom's Serious Fraud Office (SFO). At the SFO, Alex works on fraud and bribery cases involving a range of industry sectors. Alex has particular experience of working on global bribery investigations and on deferred prosecution agreements.

Prior to joining the SFO, Alex worked in the Commercial Litigation team of an international law firm.

Penny Dunbabin, Home Office, Senior Policy Lead

Penny has spent most of her career in the energy sector, including scientific advice for renewables and nuclear decommissioning policy. During Covid, she undertook two placements with the Economic Crime team in BEIS, firstly working on the consultation to expand the powers of the Companies House Registrar and secondly working on project planning for the secondary legislation programme for the Economic Crime and Corporate Transparency Act 2023.

She joined the Home Office in 2023 and was responsible for writing the guidance for the offence of failure to prevent fraud. This included an informal consultation with over 50 Government departments, regulators and arms length bodies and over 100 industry representatives, including 38 trade bodies and a number of professional bodies who circulated to their members.

James Lovatt, Santander UK Branch, Chief Compliance Officer and MLRO



James was appointed Chief Compliance Officer and MLRO for Santander London Branch in 2024. He is responsible for the strategic direction of the team, interacting with the wider Santander Anti-Money Laundering teams, as well as day-to-day management of Anti-Money Laundering operations. Prior to this role James was appointed Head of Financial Crime, Europe and Asia-Pacific in late 2017 at TD Securities to lead the Anti-Money Laundering and Financial Crime function across the region. He was responsible for the strategic direction of the team, interacting with the

global TD Securities Anti-Money Laundering unit, as well as day-to-day management of Anti-Money Laundering operations. He has also led several wholesale compliance teams at firms such as State Street and Investec. He began his career at Price Waterhouse Coopers as a Regulatory Consultant.

James obtained a Master's degree in Financial Regulatory Management from the London Metropolitan Business School and a Master's degree in Politics from Edinburgh University. He is a Certified Anti-Money Laundering Specialist and a member of the Chartered Institute for Securities and Investment. As a strong supporter of giving back to his local community, James has been a Governor at a Primary School in Southwest London for several years.

F. SPONSOR PROFILES

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COMPLY ADVANTAGE[®]

[ComplyAdvantage](#) is the financial industry's leading source of AI-driven financial crime risk data and fraud detection technology. ComplyAdvantage's mission is to neutralize the risk of money laundering, terrorist financing, corruption, and other financial crime. More than 1000 enterprises in 75 countries rely on ComplyAdvantage to understand the risk of who they are doing business with through the world's only global, real-time database of people and companies. The company identifies thousands of risk events daily from millions of structured and unstructured data points. ComplyAdvantage has four global hubs in New York, London, Singapore, and Cluj-Napoca and is backed by Goldman Sachs, Ontario Teachers, Index Ventures, and Balderton Capital.

[Find out more on ComplyAdvantage website.](#)

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A&O SHEARMAN

[A&O Shearman](#) transforms the way law is practiced, to deliver unparalleled results for our clients' most complex matters – everywhere in the world. We're a law firm at the forefront of the forces changing the current of global business. A&O Shearman's finance team is renowned as one of the strongest and deepest in the world, with top-tier lawyers located in all the major markets. We have acted on many of the highest-profile financial services enforcement and litigation matters of recent years and are regularly called on by governments to help develop new regulatory frameworks. Fluent in U.S. law, English law, and the laws of the world's most dynamic markets in equal measure, we support our clients with bespoke teams of expert minds. On May 1, 2024, Allen & Overy and Shearman & Sterling merged to become A&O Shearman.

[Find out more on A&O Shearman website](#)

SUPPORTING SPONSORS



[Avyse Partners](#) was founded in April 2021 with the goal of improving regulatory compliance outcomes for clients across Financial Services. The business, based in London, was established with a stringent focus on purpose-led consulting, helping clients navigate the volume and complexity of regulation by providing support on both short-term and long-term engagements. Today, they work with a broad variety of blue-chip financial institutions and brands providing mission-critical, regulatory driven compliance services across 4 separate practices - Financial Crime, Financial Services Compliance ('FS Compliance), Environmental, Social & Governance ('ESG') and Change & Transformation ('C&T'). In 2022, Avyse Partners were appointed to the FCA's Skilled Person Panel across five Lots (B, C, D, E & M). Appointment to the panels enhanced their reputation as a trusted advisor capable of delivering high quality regulatory assessments. In addition to enhancing the firm's market position and opening new business opportunities, the appointment has provided Avyse with a direct line to the FCA to stay abreast of future changes to the regulatory environment.

[Find out more on the Avyse Partners website](#)



GREAT CHATWELL
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[Great Chatwell Academy of Learning \(GCAL\)](#) is a leading provider of professional development in financial crime compliance. Our mission is to deliver high-quality, engaging training that informs and inspires individuals and firms to excel. Serving over 100 regulated firms globally and UK professional bodies, we provide customised, multilingual training that meets both UK and international regulatory requirements. GCAL goes beyond traditional learning by incorporating interactive elements, case studies, and practical insights to help firms foster a proactive compliance culture, positioning your team to confidently address the evolving landscape of financial crime compliance.

[Find out more on the Great Chatwell Academy of Learning website](#)

G. DELEGATE LIST

Delegate	Company Name	Job Title
Mr Adrian Abbott	National Bank of Kuwait (International) plc	CRO
Ms Chitra Abhani	Association for Financial Markets in Europe (AFME)	Associate, Compliance
Ms Subuola Abraham	Ghana International Bank plc	Head of Compliance and MLRO
Mrs Janice Acquah	ABC International Bank plc	Compliance Manager - Regulatory Change
Ms Osayuwere Agho	Zenith Bank (UK) Ltd	MLRO & Deputy Compliance Manager
Ms Ghenaa Ahmed	SMBC Bank International plc	Financial Crime Risk Assessments
Mr Eugene Aikhuele	Guaranty Trust Bank (UK) Ltd	Compliance Officer
Ms Evren Akkaya	ICBC (London) plc	Manager, Financial Crime Prevention
Mrs Susie Alier	Wilmington Trust SP Services (London) Limited	Head of Global Capital Markets Europe
Miss Dea Alimani	China Merchants Bank Co., Ltd	Compliance Officer
Ms Regina Allanah	Sumitomo Mitsui Trust Bank, Ltd	Financial Crime Officer
Ms Elizabeth Alpass	Citibank NA (London Branch)	Senior Lead Counsel, EMEA Sanctions, AML and Anti-Bribery Counsel, Legal Global Legal Affairs & Compliance
Mr Alex Alves	United Bank for Africa (UK) Ltd	Head of Compliance and MLRO
Ms Nora Amin	CaixaBank UK	Head of Compliance
Ms Uddy Anowoi	Guaranty Trust Bank (UK) Ltd	Compliance Officer
Mr Ali Ansari	National Bank of Egypt (UK) Ltd	MLRO
Mr Jose Arevalo	Commerzbank AG	Director – Regulatory Risk & Control Oversight
Mr Iain Armstrong	IVXS UK Limited t/a ComplyAdvantage	Regulatory Affairs Practice Lead
Mrs Velina Atanasova	Alpha Bank London Ltd	Deputy MLRO
Mr Conor Bailey	BNP Paribas London Branch	Sanctions Compliance Officer
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