31 May 2018

Dear All,

We operate in a highly connected world where the financial system is highly regulated and where banks are essentially the gate-keepers to international transaction flows. We take this responsibility very seriously and it is important that every member of staff is reminded of this responsibility.

We are taking this opportunity to remind each one of you that the Bank maintains a zero tolerance policy for money laundering and terrorism financial incidents and that we do not accept excuses for any breaches of the relevant legislation or for breaches of the Bank’s internal policies, procedures or its compliance framework. The policies and procedures are in place to ensure that we fulfil our legal, regulatory and societal obligations to protect the financial system.

Since 2014, our Anti-financial Crime Framework and our Compliance Framework have been completely overhauled. The Bank’s current policies, procedures, monitoring and assurance activities are set at the highest industry standards in Europe but they rely on our people to implement these standards. It is each of your responsibility to ensure we meet these standards and implement our policies.

Compliance is a culture and a mindset. Each of our Line Directors have been asked to set demanding standards for 2018, both in Know Your Customer (KYC) activities and in evidencing the full implementation of our transaction monitoring standards. The Board of Directors and the Executive Committee of the Bank are fully focused on meeting these high standards and it is important that each of our employees take their role in implementing these standards seriously.

In 2018, any failure to meet these standards or poor results from AML/KYI onsite reviews will necessarily have repercussions on the performance evaluation of affected units and personnel.

Please make sure that you take this very seriously and that we collectively ensure that the standards of compliance across the Bank are both clear and embedded.

Sincerely

Dr Josef Ackermann
Chairman

John Hourican
CEO