

SWIFT UK FINANCIAL CRIME COMPLIANCE ADVISORY GROUP (FCCAG) TERMS OF REFERENCE

DATE APPROVED BY GROUP	May 2025
DATE APPROVED BY BOARD	May 2025
DATE FOR NEXT REVIEW	May 2026

1 BACKGROUND

With Swift's introduction of Know Your Customer (KYC) and Anti-Money Laundering (AML) initiatives, the focus of the UK Financial Crime Compliance Advisory Group (UK FCCAG) is towards operational issues linked to correspondent banking but also covers the needs of securities players and corporates.

Specifically, the scope of the Group will include:

- Know Your Customer
- Sanctions
- Anti Money Laundering.

Fraud prevention will not be included as a topic although the Group will receive regular updates on Swift fraud detection initiatives.

The UK FCCAG forms part of SWIFT UK Ltd ("SWIFT UK"), a company formed to support the UK community of Swift users by coordinating their views, forming common UK policy and facilitating communication and collaboration between Swift SC and the UK community. Swift UK performs the function of Swift National Member and User Group for the United Kingdom, but is independent of Swift SC.

2 OBJECTIVES

- Provides input to Swift SC's Financial Crime Compliance Advisory Group ("global FCCAG") on proposals for development of standards, policies and shared services in non- competitive areas linked to financial crime compliance.
- Monitors regulatory developments and provides a forum to exchange views on the operational impact of such developments (direct liaison with regulators remains the responsibility of each member);
- Engages the operational, transaction banking, securities, corporate banking and compliance divisions of financial institutions in a discussion on the operational implications of dealing with FCC regulations.
- Advises the UK Banking and Payments Committee (and ultimately the SWIFT UK Ltd Board) in formulating and scoping FCC strategy and business development plans for standards, market practices and shared services where they relate to financial crime compliance.
- Provides feedback to the SWIFT UK secretariat on Swift Board papers that relate to financial crime compliance (for incorporation into the Board paper briefing); and

- recommends a UK position on any decision items in the Board papers and escalates any other concerns or requirements to the SWIFT UK Board as appropriate.

3 STRUCTURE

a) Chair

- The FCCAG will elect a chairperson for a term of three years, which is renewable.
- The Chair will agree the agenda, actions, and minutes with the Secretariat; and
- The FCCAG will elect a deputy Chair if required by the Chair for three years (renewable).

b) Deputy Chair(s)

- Alternate with the Chair, dependent on availability, for FCCAG sessions.
- Work with the Chair on the UK Board summary as necessary.
- Attend the UK SWIFT Board if the FCCAG Chair is unavailable (if permitted by SWIFT UK Board Chair).
- Work with the Chair on Board paper presentations and agenda.
- Undertake ad hoc activities on specific topics (i.e. Swift transaction management platform / associated securities activity reports).

c) Membership

- Participation is open to all SWIFT UK members.
- Representatives of Swift will be invited to attend.
- Representatives of other stakeholders may also be invited to attend, with agreement of the Group.
- Members of UK FCCAG may be invited to provide input and advice on specific topics within their area of expertise, supporting Swift and UK board with queries and feedback points.
- Members of the UK FCCAG will be expected to attend and contribute to the meetings, where not possible then an alternate can be used; with members encouraged to share the outputs within their organisations to increase awareness of the Swift and UK developments; and
- As the work of the UK FCCAG is driven by the agenda of the global FCCAG, the chairperson of the UK FCCAG will be a member of the global FCCAG. Global FCCAG members are appointed by Swift, however they are expected to provide feedback from their national communities and share the outcome of global FCCAG discussions with their national groups. In the interests of good governance, prospective members of the global FCCAG who represent the UK should seek the endorsement of the UK FCCAG before joining the global FCCAG.

d) Skills, Knowledge, and Experience

Representatives are expected to have:

- Subject matter expertise in a specific area of Financial Crime that includes one or more of Sanction Screening (Name or Transaction), Payments Transparency and Transaction Monitoring. Subject matter expertise should include an understanding of the e2e process, including the associated operational process.
- Ability to network across your bank and bring to the attention of the UK FCCAG any key programs and or industry changes inflight or on the horizon that have an impact on Financial Crime processes including Sanction Screening (Name or Transaction), Payments Transparency and Transaction Monitoring.

e) Swift support

- Swift provides key support and expertise for this User Group; and
- The Swift host must be present at every face-to-face meeting held at Swift's offices and if unavailable must provide an alternate who can attend.

f) Escalation and Authority

- The UK FCCAG will report to the SWIFT UK BPC (Banking & Payments Committee). Regular progress reports will be provided to the UK BPC by the chairperson.
- Where consensus cannot be achieved, the UK FCCAG chairperson will refer the issue to the UK BPC, advising the majority view with a note indicating the size of minority opinion; and
- Secretariat support is provided by SWIFT UK Ltd.

4 Administration

a) Meeting Frequency

- The UK FCCAG will convene around meetings of the global FCCAG, preferably afterwards so that members can receive an update; and
- Other meetings will be arranged at the request of the Chair.

b) Papers and Meeting set up.

- The Secretariat will collate and distribute the papers to the members; and
- Regular progress reports will be provided to the Board by the Secretariat or by the Chairperson at the invitation of the Board.

c) Funding

- The UK FCCAG is funded from the SWIFT UK Ltd budget.

d) ToR review & update

- The ToR will be reviewed annually.

5 Competition Law and Conflicts of interest

Members and attendees must be aware of their obligations to avoid any conflicts of interest and breach of competition law.

Members are asked to ensure that commercially sensitive information is not shared and that any conflicts of interest are disclosed.

SWIFT UK Ltd is fully committed to complying with applicable competition laws.

Competition laws involve not just formal legal agreements, but informal agreements and day-to-day business conduct, as well.

Generally, competition laws mandate:

- No collusion/agreement with other firms on pricing.
- No comparing notes with other firms on business strategies.
- No pricing below cost; and
- No allocation of markets/territory with other firms.

As SWIFT UK Ltd may be viewed as an industry trade association it must avoid being seen as a facilitator of meetings of competitors at which prohibited conduct of the type referenced above may take place.

Appendix 1

Current UK FCCAG Representation as of 6 May 2025

Name	Company	Designation
Lewis Cooke	Barclays Bank Plc	Attendee+ Alternate
Richard Norman	Barclays Bank Plc	Attendee
Isabelle Bouille	BNY Mellon	Attendee
Denitsa Rebaine	BNY Mellon	Attendee
Adam Oyebanji	BNY Mellon	Attendee
Anu Ratan	BNY Mellon	Attendee
Beatrice Di Michele	Calastone Ltd.	Info only
Karimah Ayinde	Calastone Ltd.	Attendee
Martin Freeman	Calastone Ltd.	Attendee
Louise Green	HSBC Bank Plc	Attendee
Chris Pratt	HSBC Bank Plc	Chair
Stuart Piper	HSBC Bank Plc	Attendee
Martin Maguire	iFast Global	Attendee
Fahim Shafiqi	iFast Global	Attendee
Jo Clark	Lloyds Banking Group	Attendee
Ralph Mason	Lloyds Banking Group	Deputy Chair
Samuel England	User Group Chair	Attendee
Fiona Gall	NatWest	Attendee
Toby Gregson	NatWest	Attendee
Johnathan Bugeja	NatWest	Attendee
Pankaj Sharma	NatWest	Alternate
Dawn Taylor	NatWest	Attendee
Andrew Marsland	Santander	Attendee
Ben Taylor	Santander	Alternate
Jagriti Das	Standard Chartered Bank	Attendee
Mayur Bhudia	Standard Chartered Bank	Attendee
Stephen Grainger	SWIFT Host	Attendee
Mike Powell	SWIFT Host	Attendee