

Sanctions Regimes and their Impact on Banks

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Case Study – Key Facts

- A bank headquartered in the Middle East, with a subsidiary company in Paris and a branch office in London
- The UK compliance officer of the London branch has been asked to review two transactions flagged by the payments team, which will be processed through London:
 - **Transaction 1: A €500 payment to a hotel in Tunisia on behalf of a UK client**
 - **Transaction 2: A \$75,000 payment to an Iranian entity on behalf of a client of the bank's Paris subsidiary, which will be routed through London. A member of the payments team has dual US citizenship. The Iranian entity is on the US SDN list.**

Any Questions?



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