

STATEMENT OF NEIL GEORGE JEANS – RFS – Initialism - 001

ANNEX A

Neil Jeans – Curriculum Vitae

Personal Details

Full Name: Neil George Jeans



Professional Profile

Neil has a unique background in financial crime compliance and risk management, spanning over 25 years.

Neil began his career as a stockbroker trading equities, bonds, and derivatives, before working within Law Enforcement agencies investigating financial crime, including domestic and international fraud and money laundering, and as a Financial Services Regulator developing AML/CTF regulation and supervision techniques.

Neil has worked at senior levels managing AML/CTF, Sanctions and Anti-Bribery compliance across Europe, the US, Latin America, Asia, and Australia within two major global investment bank, one European financial services company and a major Australian bank.

Between 2003 and 2006, Neil was a member of the Board of the UK's Joint Money Laundering Steering Group (JMLSG) which sets the AML/CTF standards for all regulated businesses in the UK.

Neil until 2019 was a member of the faculty and lectures as part of the International Compliance Association (ICA) Post Graduate Diploma of Applied Anti Money Laundering and Counter Terrorism Management.

Neil was founding member of the Society for Worldwide Interbank Financial Telecommunication (SWIFT) AML and Sanction Advisory Group.

Neil was founding Joint-Chair of the Association of Certified Anti-Money Laundering Specialists (ACAMS) Australasian Chapter and now sits on their Advisory Board.

Since 2012, Neil has run a specialist AML/CFT consultancy providing advice and support to business subject to AML/CTF regulation, including undertaking independent reviews of the adequacy AML/CTF systems controls for regulated entities, with a significant focus on capital market participants.

Neil has regularly attended the Private Sector Expert forum of the Financial Action Task Force (FATF) -the international body that sets AML/CTF standards globally and was a founding participant in the FATFs FinTech and RegTech Forum in 2017.

Between 2013 and 2018, Neil worked with Thomson Reuters, a major global vendor of financial crime solutions, to develop an innovative customer due diligence solution, including the design and development of the first National KYC Utility in South Africa.

In 2017, Neil was appointed by AUSTRAC as their 'expert witness' in the civil claim against CBA for AML/CTF breaches, which resulted in CBA paying a settlement of \$700 million in 2018.

In 2019, Neil was appointed by AUSTRAC as their 'expert witness' in the civil claim against Westpac for AML/CTF breaches, which resulted in Westpac paying a settlement of \$1.3 billion in 2021.

In July 2019, Neil was authorised by AUSTRAC to be the External Auditor for AfterPay, the Buy Now Pay Later business, to audit AfterPay's compliance with its obligations under the AML/CTF Act and Rules.

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Detailed Employment History

April 2013 to date

Initialism Pty Ltd

Principal and Owner

Engaged in private consultancy company based in Australia through which advice and assistance has been provided to regulated businesses in relation to financial crime risk and controls, including anti-money laundering and counter terrorism financing regulation, as well anti-bribery, and sanctions.

I have advised and assisted clients in the UK and Asia-Pacific, including some of Australia's largest financial services organisations including banks, superannuation funds, investment managers, financial planners, money remitters, life insurance companies, payment platforms, and FinTech's, as well as digital currency providers.

The services provided, include the development and maintenance of AML/CTF Programs and ML/TF Risk Assessments, Independent Reviews, Advisory, and advice and support regarding Regulatory Proceedings.

May 2016 to July 2018

AML Accelerate Pty Ltd

Co-founder and Owner

AML Accelerate Pty Ltd was co-founded as a joint venture with Arctic Intelligence (formerly Financial Crimes Solutions) with the goal of developing an accessible and affordable solution for performing money laundering and terrorism financing risk assessments and for creating AML/CTF Program Manuals tailored to over 25 industry sectors and applicable to regulated entities regardless of their size, industry sector or geographic locations.

AML Accelerate is a member of Stone and Chalk, the Australian Fintech and Regtech innovation hub, and a founding member of the Australian Regtech Association.

June 2013 to May 2018

Thomson Reuters

KYCaaS Head of Policy & Standards

I worked closely with Thomson Reuters, a major global vendor of financial crime solutions, in developing an innovative customer due diligence product and solutions. My role was to design functionality and develop policy that supports the solution which collects and validates customer identity, screens, and assesses customers for money laundering risk and undertakes ongoing monitoring to ensure the continued accuracy of the identity information.

This has involved engagement with senior stakeholders within Thomson Reuters, working with many major financial institutions around the globe, and engaging with key regulators.

My work with Thomson Reuters included the design and development of the first National KYC Utility in South Africa.

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August 2012 to April 2013

Santander UK

Group MLRO and Anti-Bribery Officer

Contracted to act as CF11 and Anti-Bribery Officer for Santander UK's businesses, running AML, Sanctions and ABC compliance activities across the Retail, Corporate and Global Markets' banking businesses. This involved leading a significant change program to enhance the Group-wide AML, Sanction and ABC systems and controls, whilst maintaining business as usual operations.

August 2011 to July 2012

PwC

Director Fraud and Forensic Services

The role was to provide professional services and audits in the Areas of Fraud Risk Management, Forensic Investigations, AML & Sanction Compliance and Risk Management, and Bribery & Corruption Compliance, Risk Management, and Investigations, to clients in the financial services and commodities industries.

May 2006 to July 2011

National Australia Bank

General Manager Group Risk Assurance (Oct 2009 to July 2011)

The role headed up a function within Group Risk, which is responsible for developing frameworks and tools, and providing oversight and assurance on risk management assurance processes throughout the NAB Group.

The role was responsible for leadership in the shaping of assurance as a discipline within the Risk Management. The role also involved managing teams that provide specific thematic assurance over the quality of risk management practices focused on Compliance Risk (including AML/CTF and Sanctions), Operational Risk (including Fraud), and Environmental Risk.

As part of this role, I also retained responsibility for providing bi-annual assurance to the Group's Principal Board, regarding the effectiveness of AML and Sanctions risk management and compliance, providing SME support to group-wide AML and Sanctions compliance teams and leading and participating in internal Group and Regional, as well as external international, AML and Sanctions forums.

In 2010, I led - on behalf of the Group CEO and CRO - an initiative in relation to the formation of a Financial Crime Operations Centre of Excellence which brought together the operational elements of Fraud, Sanctions and Anti-Money Laundering.

Head of Group Financial Crime & Security (May 2006 to Oct 2009)

The role was responsible for coordinating the Group's Financial Crime (AML, Fraud,

Sanctions and Anti-Bribery) and Security risk management and compliance activity. This included:

- Providing assurance to the Group's senior management, including principal board, regarding the effectiveness of the Group's Financial Crime & Security risk management.
- Developing and maintaining the Group's AML and Sanctions and Embargoes Policies and control infrastructure.
- Setting and coordinating Group-wide approach to compliance with sanctions

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legislation through the Group's Sanctions Control Board.

- Engaging with, and providing support to, regional business to manage and mitigate the Group's Financial Crime & Security risks and co-ordinating cross-Region issues.

The role included "Subject Matter Expert" (SME) advice and providing internal consultancy services to, as well as oversight of, and project sponsorship for, the Australian AML Legislation project, which implemented the new AML requirements throughout the Group.

As Head of Group Financial Crime & Security, I was also tasked with coordinating the review and remedial activity related to the settlement by National Australia Bank with the US Office of Foreign Asset Control (OFAC) regarding sanction breaches in 2006/2007.

May 2004 to May 2006 **UBS AG**

Director - Group Head of AML Policy and Transaction Monitoring (May 2005 to May 2006)

UBS' Group Money Laundering Prevention Unit is tasked with coordinating, monitoring, and implementing anti-money laundering (AML) activities throughout the UBS Group.

As Group Head of AML Policy, Training, and Transaction and Customer Monitoring my primary focus was to ensure that UBS Group had appropriate, adequate (as part of its risk-based approach), effective and regulatory compliant AML policies and procedures, AML training regimes, and had in place appropriate AML and Sanctions monitoring programmes.

Director – Money Laundering Prevention (May 2004 to May 2005)

As part of a four-person Global AML Business Leadership Team for UBS Investment Bank (UBS-IB), my main responsibilities were the development and maintenance of anti-money laundering policy, procedures and operations for UBS-IB globally, as well as providing input and support to the regional functions and UBS-IB Business Area(s) staff in EMEA, the Americas, and Asia. This included development of key policies and of AML Risk Frameworks for UBS-IB globally, and advising the business on the development of AML and Sanction operations.

Oct 2000 to May 2004 **ABN AMRO Bank NV**

Head of Financial Crime ABN AMRO Bank NV (Oct 2000 to May 2004)

At ABN AMRO I was responsible for financial crime risk management and operations throughout a network of 46 Countries, throughout Europe, Asia, and the Americas. This involved providing guidance and support to local compliance staff within those countries on the full range of Fraud, AML, and Sanctions matters, including setting and implementing group policies, compliance with local requirements, training and awareness, transaction monitoring, and KYC. As part of this role I was CF11 for the UK businesses.

The role also included close liaison with ABN AMRO specialist Fraud and AML investigation functions and Internal Audit.

Dec 1998 to Oct 2000 **Financial Services Authority (FSA)**

Manager – ARROW Project (May 2000 to Oct 2000)

I was responsible for managing part of the FSA Themed Money Laundering project as part of the "new regulator for the new millennium" (ARROW) initiative. The project examined

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money laundering compliance and operations activity throughout the financial services industry in preparation for the FSA's new responsibilities resulting from the Financial Services & Markets Act.

Associate (Dec 1998 to May 2000)

My duties included the day-to-day supervision of FSA authorised firms. I was a member of the FSA Rules Committee tasked with drafting the FSA Money Laundering Source Book, which until the development of the JMLSG Guidance formed the basis of AML regulatory requirements in the UK.

I chaired an FSA-wide Money Laundering Rules Supervision Procedures Sub-Group tasked with developing supervision procedures for the FSA to supervise authorised firms' AML programmes.

Dec 1991 to Nov 1998

Metropolitan Police Service

Detective Constable – National Crime Squad of England & Wales (NCS), Money Laundering Investigation Team (September 1995 to December 1998)

As part of a 12-person specialist team, I investigated complex and sophisticated financial crime and money laundering cases, both nationally and internationally.

Police Constable – Metropolitan Police (December 1991 to September 1995)

Based in central London, after an 18-month period in uniform, during which I completed a secondment to the City of London and Metropolitan Police Fraud Squad (SO6), I undertook various plain-clothes assignments, including general detective work and divisional crime squad duties.

From June 1992 until September 1995, I worked as a financial investigator as part of a Major Crime Investigation Pool and latterly as a Divisional CID Officer. My work on the Area Major Crime Investigation Pool consisted of both proactive and reactive financial investigations and the financial profiling of murder victims and criminal suspects involved in international money laundering and drugtrafficking.

Sept 1991 to Dec 1991

As a result of being made redundant from Barclays de Zoete Wedd due to the business' relocation to Glasgow, I was not working whilst waiting to join the Metropolitan Police Service.

Jan 1988 to Sept 1991

Barclays de Zoete Wedd.

Senior Associate

My role included managing a team of client facing advisors, advising upon, and dealing in securities for the firm's private client base.

Sept 1984 to Jan 1988

Stancliffe Todd Hodgeson Stockbrokers

Dealer and Portfolio Manager

Working initially as a "blue button" and then dealer on the floor of the London Stock Exchange, I supported the firms' "half commission brokers" in managing high net worth clients, trading in equities, corporate and government bonds, and options.

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External Industry Activity

From 2017 to date	Participant Counter-Terrorist Financing Annual Summit between Australia, Indonesia, and Thailand.
From 2017 to 2018	Member of the Financial Action Task Force (FATF) Regtech/Fintech Forum.
From 2012 to 2019	Member of the Faculty and Lecturer for the Australian Compliance Institute (ACI) AML Diploma.
From 1997 to date	A regular participant and contributor to the Cambridge Symposium on International Economic Crime at Jesus College Cambridge.
From 2009 to 2011	Represented Asia Pacific members of SWIFT on the SWIFT Sanction Advisory Group , a sub-committee of the SWIFT board.
From 2005 to 2011	I represented the London Investment Bankers Association (LIBA) and then Australian Financial Markets Association (AFMA) representing Australia and Asia Pacific, on the International Council of Securities Associations (ICSA) AML Committee, and attending the Financial Action Task Force (FATF) Private Sector Expert forum.
From 2008 to 2009	I led the drafting committee that developed the Australian Industry Guidelines on Sanction Compliance for the Australian Bankers Association (ABA) to comply with Australia's International Trade Integrity Act.
From 2008 to 2010	I was Co-Chair of the Association of Certified Anti-Money Laundering Specialists (ACAMS) Australasian Chapter.
From 2004 to 2006	I was a member of the Joint Money Laundering Steering Group (JMLSG) Board and was significantly involved in the JMLSG Guidance redraft published in early 2006.
From 2003 to 2006	I was Chairman of the UK Futures & Options Association (FOA) Anti-Money Laundering Committee, which represents the members of the FOA at regulatory, governmental and industry forum.
From 2004 to 2005	I was a member of the Financial Services Authority (FSA) (cross-discipline) Customer Identification Working Group, chaired by Director of Financial Crime.
In Late 2001 and 2002	Post the events of 9/11, I worked with Europol on the use of the financial markets to finance terrorist activity.
In 1999 and 2000	I lectured emerging money laundering techniques at the FBI Training Academy in Quantico, USA.