

BrokerCheck Report

STANDARD CHARTERED SECURITIES NORTH AMERICA LLC

CRD# 130847

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

About BrokerCheck®



BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
 - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
 - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

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Thank you for using FINRA BrokerCheck.



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. [For more information about FINRA, visit www.finra.org.](http://www.finra.org)



STANDARD CHARTERED SECURITIES NORTH AMERICA LLC

CRD# 130847

SEC# 8-66397

Main Office Location

1095 AVENUE OF THE AMERICAS
NEW YORK, NY 10036
Regulated by FINRA New York Office

Mailing Address

1095 AVENUE OF THE AMERICAS
NEW YORK, NY 10036

Business Telephone Number

(212) 667-0700

Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 05/17/2017.

Its fiscal year ends in December.

Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 3 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 8 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm does not have referral or financial arrangements with other brokers or dealers.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? **No**

The number of disclosures from non-registered control affiliates is 11



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 05/17/2017.

Its fiscal year ends in December.

Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

STANDARD CHARTERED SECURITIES NORTH AMERICA LLC

Doing business as STANDARD CHARTERED SECURITIES NORTH AMERICA LLC

CRD# 130847

SEC# 8-66397

Main Office Location

1095 AVENUE OF THE AMERICAS
NEW YORK, NY 10036

Regulated by FINRA New York Office

Mailing Address

1095 AVENUE OF THE AMERICAS
NEW YORK, NY 10036

Business Telephone Number

(212) 667-0700



Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

Direct Owners and Executive Officers

Legal Name & CRD# (if any): STANDARD CHARTERED HOLDINGS INC.

Is this a domestic or foreign entity or an individual? Domestic Entity

Position OWNER

Position Start Date 05/2017

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): DALAL, NEIL

3181689

Is this a domestic or foreign entity or an individual? Individual

Position CHIEF OPERATIONS OFFICER

Position Start Date 12/2022

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): DEFILIPPO, MANDY J

7184614

Is this a domestic or foreign entity or an individual? Individual

Position PRESIDENT AND CHIEF EXECUTIVE OFFICER

Position Start Date 06/2025

Firm Profile



Direct Owners and Executive Officers (continued)

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): HAUSCHILD, AUGUST DANIEL
4287421

Is this a domestic or foreign entity or an individual? Individual

Position ANTI MONEY LAUNDERING COMPLIANCE OFFICER

Position Start Date 05/2025

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): JONES, PAUL FAULKNER
7630280

Is this a domestic or foreign entity or an individual? Individual

Position CHIEF RISK OFFICER

Position Start Date 07/2022

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): NIELSEN, PETER

Firm Profile



Direct Owners and Executive Officers (continued)

	1072259
Is this a domestic or foreign entity or an individual?	Individual
Position	FINANCIAL AND OPERATIONS PRINCIPAL
Position Start Date	05/2011
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No
<hr/>	
Legal Name & CRD# (if any):	PAULIC, JACINTA 5823367
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF COMPLIANCE OFFICER, HEAD, CFCC ADVISORY FM AMERICAS
Position Start Date	03/2024
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No
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Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

Indirect Owners

Legal Name & CRD# (if any): STANDARD CHARTERED BANK

Is this a domestic or foreign entity or an individual? Foreign Entity

Company through which indirect ownership is established STANDARD CHARTERED HOLDINGS INC.

Relationship to Direct Owner OWNER

Relationship Established 12/1989

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): STANDARD CHARTERED HOLDINGS LIMITED

Is this a domestic or foreign entity or an individual? Foreign Entity

Company through which indirect ownership is established STANDARD CHARTERED BANK

Relationship to Direct Owner OWNER

Relationship Established 01/1970

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): STANDARD CHARTERED PLC

Is this a domestic or foreign entity or an individual? Foreign Entity

Firm Profile



Indirect Owners (continued)

Company through which indirect ownership is established	STANDARD CHARTERED HOLDINGS LIMITED
Relationship to Direct Owner	OWNER
Relationship Established	01/1970
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No



Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

This firm was previously:	STANDARD CHARTERED SECURITIES N.A. INC.
Date of Succession:	05/17/2017
Predecessor CRD#:	130847
Predecessor SEC#:	8-66397
Description	STANDARD CHARTERED SECURITIES (NORTH AMERICA)LLC ASSUMES SUBSTANTIALLY ALL OF THE ASSETS AND LIABILITIES OF STANDARD CHARTERED SECURITIES N.A. INC. THERE IS NO CHANGE IN OWNERSHIP OR CONTROL. NEITHER THE ULTIMATE OWNERSHIP NOR THE PRINCIPALS WILL CHANGE. PLEASE NOTE THE SUCCESSION DID NOT OCCUR ON 4/30/2017 AS INITIALLY INTENDED. THE CORRECTED DATE WAS PUSHED BACK TO 5/17/2017.
This firm was previously:	STANDARD CHARTERED SECURITIES N.A. INC.
Date of Succession:	04/30/2017
Predecessor CRD#:	130847
Predecessor SEC#:	8-66397
Description	STANDARD CHARTERED SECURITIES (NORTH AMERICA)LLC ASSUMES SUBSTANTIALLY ALL OF THE ASSETS AND LIABILITIES OF STANDARD CHARTERED SECURITIES N.A. INC. THERE IS NO CHANGE IN OWNERSHIP OR CONTROL. NEITHER THE ULTIMATE OWNERSHIP NOR THE PRINCIPALS WILL CHANGE.
This firm was previously:	SCB SECURITIES LIMITED
Date of Succession:	08/15/2008
Predecessor CRD#:	130847
Predecessor SEC#:	8-66397
Description	STANCHART SECURITIES (NORTH AMERICA) INC. ASSUMES SUBSTANTIALLY ALL OF THE ASSETS AND LIABILITIES OF SCB SECURITIES LIMITED. NEITHER THE ULTIMATE OWNERSHIP NOR THE PRINCIPALS WILL CHANGE.



Firm Operations

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 1 SRO and 3 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	10/07/2004

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: Yes

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	10/07/2004

Firm Operations



Registrations (continued)

U.S. States & Territories	Status	Date Effective
California	Approved	05/08/2009
New York	Approved	11/10/2004
Texas	Approved	03/12/2009



Firm Operations

Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 8 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Broker or dealer selling corporate debt securities
U S. government securities broker
Put and call broker or dealer or option writer
Non-exchange member arranging for transactions in listed securities by exchange member
Private placements of securities
Broker or dealer selling interests in mortgages or other receivables
Other - MERGER AND ACQUISITION ACTIVITIES, DISTRIBUTION OF DEBT RESEARCH, AND DISTRIBUTION OF THIRD-PARTY RESEARCH.

Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.

This firm does not engage in other non-securities business.

Non-Securities Business Description:

Firm Operations



Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does not refer or introduce customers to other brokers and dealers.

Firm Operations

Industry Arrangements



This firm does have books or records maintained by a third party.

Name: STANDARD CHARTERED BANK

Business Address: 1 ALDERMANBURY SQUARE
LONDON, UNITED KINGDOM EC2V 7SB

Effective Date: 10/07/2004

Description: MEMBER OPERATES UNDER A SERVICE LEVEL AGREEMENT WITH STANDARD CHARTERED BANK AND WILL NOT HOLD CUSTOMER FUNDS OR SECURITIES.

This firm does have accounts, funds, or securities maintained by a third party.

Name: STANDARD CHARTERED BANK

Business Address: 1 ALDERMANBURY SQUARE
LONDON, UNITED KINGDOM EC2V 7SB

Effective Date: 10/07/2004

Description: MEMBER OPERATES UNDER A SERVICE LEVEL AGREEMENT WITH STANDARD CHARTERED BANK AND WILL NOT HOLD CUSTOMER FUNDS OR SECURITIES.

This firm does not have customer accounts, funds, or securities maintained by a third party.

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

This firm does not have individuals who wholly or partly finance the firm's business.



Firm Operations

Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

This firm is, directly or indirectly:

- in control of
 - controlled by
 - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.**

STANDARD CHARTERED BANK controls the firm.

Business Address:	1 BASINGHALL AVENUE LONDON, UNITED KINGDOM EC2V 5DD
Effective Date:	02/11/2004
Foreign Entity:	Yes
Country:	UNITED KINGDOM
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	100% OWNERSHIP

This firm is directly or indirectly, controlled by the following:

- bank holding company
- national bank
- state member bank of the Federal Reserve System
- state non-member bank
- savings bank or association
- credit union
- or foreign bank

STANDARD CHARTERED BANK is a Foreign Bank and controls the firm.

Business Address:	1 BASINGHALL AVENUE LONDON, UNITED KINGDOM EC2V 5DD
Effective Date:	02/11/2004
Description:	100% OWNERSHIP

Disclosure Events for Non-Registered Control Affiliates



All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	10	0
Criminal	0	1	0



Disclosure Event Details

Regulatory - Final

Disclosure 1 of 10

Reporting Source:	Firm
Affiliate:	STANDARD CHARTERED BANK
Current Status:	Final
Allegations:	THE SACC ALLEGED COLLUSION AMONGST 28 BANKS, INCLUDING SCB, TO FIX PRICES IN RESPECT OF ZAR TRADING DURING THE PERIOD 2007 TO 2013. THE SPECIFIC ALLEGATIONS WERE THAT SCB (I) COORDINATED TRADING ACTIVITIES AROUND THE USD/ZAR FIX; (II) AGREED TO FIX PRICES OF BIDS AND OFFERS QUOTED TO CUSTOMERS; AND (III) AGREED TO COORDINATE TRADING. IN ADDITION, THE SACC ALLEGED THAT INFORMATION SHARING TOOK PLACE IN INTERBANK CHATS. THE PRINCIPAL CONDUCT ISSUES FOR SCB CONCERN (NOW FORMER) SCB NY TRADERS' PARTICIPATION IN INAPPROPRIATE INTERBANK CHATS DURING THE PERIOD 2007 TO 2011. THESE CHATS WERE ALSO IDENTIFIED IN SCB'S 2019 CONSENT ORDER WITH THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS") CONCERNING PAST CONTROL FAILURES AND IMPROPER CONDUCT IN SCB'S FX TRADING AND SALES BUSINESS BETWEEN 2007 AND 2013.
Initiated By:	SOUTH AFRICAN COMPETITION COMMISSION (SACC)
Date Initiated:	05/19/2015
Docket/Case Number:	N/A
Principal Product Type:	Other
Other Product Type(s):	CURRENCY USD/ZAR
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	ADMINISTRATIVE PENALTY TO THE SACC OF ZAR42.7M (USD2.3M)
Resolution:	Settled
Resolution Date:	11/15/2023
Sanctions Ordered:	Monetary/Fine \$2,300,000.00
Other Sanctions Ordered:	THE KEY COMPONENTS OF THE SETTLEMENT WITH THE SACC COMPRISE PAYMENT OF AN ADMINISTRATIVE PENALTY TO THE SACC OF ZAR42.7M (USD2.3M), AS WELL AS THE ADMISSION BY SCB OF BREACHES OF THE



SOUTH AFRICAN COMPETITION ACT AND UNDERTAKINGS TO: (I) REFRAIN FROM CONTRAVENING THE ACT IN THE FUTURE; (II) CONTINUE COOPERATING WITH THE SACC IN ITS PROSECUTION OF THE OTHER BANKS; (III) SUBMIT EVIDENCE OF SCB'S COMPETITION COMPLIANCE PROGRAMME; (IV) CIRCULATE A STATEMENT SUMMARIZING THE CONTENT OF THE SETTLEMENT AGREEMENT TO STAFF WHO HAVE MARKET-MAKING RESPONSIBILITIES AT SCB SOUTH AFRICA.

Sanction Details:

SAME AS ABOVE.

Firm Statement

THE SACC ALLEGED COLLUSION AMONGST 28 BANKS, INCLUDING SCB, TO FIX PRICES IN RESPECT OF ZAR TRADING DURING THE PERIOD 2007 TO 2013. THE SPECIFIC ALLEGATIONS WERE THAT SCB (I) COORDINATED TRADING ACTIVITIES AROUND THE USD/ZAR FIX; (II) AGREED TO FIX PRICES OF BIDS AND OFFERS QUOTED TO CUSTOMERS; AND (III) AGREED TO COORDINATE TRADING. IN ADDITION, THE SACC ALLEGED THAT INFORMATION SHARING TOOK PLACE IN INTERBANK CHATS. THE PRINCIPAL CONDUCT ISSUES FOR SCB CONCERN (NOW FORMER) SCB NY TRADERS' PARTICIPATION IN INAPPROPRIATE INTERBANK CHATS DURING THE PERIOD 2007 TO 2011. THESE CHATS WERE ALSO IDENTIFIED IN SCB'S 2019 CONSENT ORDER WITH THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS") CONCERNING PAST CONTROL FAILURES AND IMPROPER CONDUCT IN SCB'S FX TRADING AND SALES BUSINESS BETWEEN 2007 AND 2013.

Disclosure 2 of 10
Reporting Source:

Firm

Affiliate:

STANDARD CHARTERED BANK

Current Status:

Final

Allegations:

ON 1/29/19, SCB AND THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS") ENTERED INTO A CONSENT ORDER CONCERNING PAST CONTROL FAILURES AND IMPROPER CONDUCT IN ITS FOREIGN EXCHANGE ("FX") TRADING AND SALES BUSINESS BETWEEN 2007 AND 2013.

THE CONSENT ORDER WITH THE DFS IS PART OF AN INDUSTRY-WIDE INVESTIGATION INTO THE CONDUCT OF FX TRADING AND SALES PRACTICES THAT RESULTED IN REGULATORY ENFORCEMENT ACTIONS AGAINST A NUMBER OF BANKS.

AS PART OF THE CONSENT ORDER, STANDARD CHARTERED HAS AGREED TO PAY A CIVIL MONETARY PENALTY OF USD40M TO THE DFS. STANDARD CHARTERED WILL TAKE A PRE-TAX CHARGE OF THIS AMOUNT AS PART OF



ITS FULL-YEAR 2018 FINANCIAL RESULTS.

SINCE THE CONDUCT AT ISSUE TOOK PLACE, STANDARD CHARTERED HAS REMEDIATED ITS SYSTEMS AND CONTROLS, AND NOW HAS AN APPROPRIATE CONTROL FRAMEWORK IN PLACE. SCB CONTINUES TO MAKE IMPROVEMENTS AS APPROPRIATE TO ENSURE WE DRIVE THE HIGHEST STANDARDS OF CONDUCT AND COMPLIANCE. SCB WILL, PURSUANT TO THIS ORDER, BE REPORTING TO THE DFS ON THIS WORK. THIS MATTER IS UNRELATED TO THE ONGOING SANCTIONS INVESTIGATION BY THE US AUTHORITIES INTO HISTORICAL CONDUCT AND CONTROLS ISSUES, WHICH WAS FIRST DISCLOSED IN 2014. THE GROUP CONTINUES TO CO-OPERATE FULLY WITH AND IS ENGAGED IN CONSTRUCTIVE DISCUSSIONS WITH RELEVANT AUTHORITIES TO RESOLVE THAT INVESTIGATION AS SOON AS PRACTICABLE.

Initiated By: THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES.

Date Initiated: 01/01/2014

Docket/Case Number: N/A

Principal Product Type: Other

Other Product Type(s): FOREIGN EXCHANGE-FX

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CONSENT ORDER

Resolution: Consent

Resolution Date: 01/29/2019

Sanctions Ordered: Monetary/Fine \$40,000,000.00

Other Sanctions Ordered: CIVIL MONETARY PENALTY: USD 40M.
CANNOT REHIRE OR RETAIN, DIRECTLY OR INDIRECTLY, CERTAIN INDIVIDUALS REFERENCED IN THE ORDER.

WITHIN 90 DAYS OF THIS ORDER,STANDARD CHARTERED SHALL:

A.SUBMIT AN ENHANCED WRITTEN INTERNAL CONTROLS AND COMPLIANCE PROGRAM ACCEPTABLE TO THE DEPARTMENT TO COMPLY WITH APPLICABLE NEW YORK STATE AND FEDERAL LAWS AND REGULATIONS WITH RESPECT TO THE BANK'S FX TRADING BUSINESS AS IT AFFECTS OR PERTAINS TO THE BANK OR NEW YORK CUSTOMERS;

B.SUBMIT A WRITTEN PLAN ACCEPTABLE TO THE DEPARTMENT TO



IMPROVE THE BANK'S COMPLIANCE RISK MANAGEMENT PROGRAM WITH REGARD TO COMPLIANCE BY THE BANK WITH APPLICABLE NEW YORK AND FEDERAL LAWS AND REGULATIONS WITH RESPECT TO ITS FX BUSINESS AS IT AFFECTS OR PERTAINS TO THE BANK OR NEW YORK CUSTOMERS; AND

C.SUBMIT AN ENHANCED WRITTEN INTERNAL AUDIT PROGRAM ACCEPTABLE TO THE DEPARTMENT WITH RESPECT TO THE BANK'S COMPLIANCE WITH APPLICABLE NEW YORK AND FEDERAL LAWS AND REGULATIONS, AS WELL AS THE BANK'S INTERNAL POLICIES AND PROCEDURES, IN ITS FX TRADING BUSINESS AS IT AFFECTS OR PERTAINS TO THE BANK OR NEW YORK CUSTOMERS.

AT THE POINT OF TWELVE AND TWENTY-FOUR MONTHS AFTER EXECUTION OF THIS CONSENT ORDER, THE BANK SHALL PROVIDE A WRITTEN PROGRESS REPORT TO THE DEPARTMENT CONCERNING AT LEAST THE FOLLOWING"A.THE BANK'S COMPLIANCE WITH APPLICABLE NEW YORK STATE AND FEDERAL LAWS AND REGULATIONS AS REGARDS ITS FX BUSINESS AS IT AFFECTS OR PERTAINS TO THE BANK OR NEW YORK CUSTOMERS;

B.THE BANK'S COMPLIANCE WITH RECOGNIZED FX INDUSTRY BEST PRACTICES AS IT AFFECTS OR PERTAINS TO THE BANK OR NEW YORK CUSTOMERS;

C.THE BANK'S CREATION OF ENHANCED POLICIES AND PROCEDURES GOVERNING THE FX BUSINESS, AND ITS COMPLIANCE WITH THOSE POLICIES AND PROCEDURES AS IT AFFECTS OR PERTAINS TO THE BANK OR NEW YORK CUSTOMERS; AND

D.THE BANK'S MAINTENANCE OF AN HONEST, ETHICAL, AND FAIR FX BUSINESS AS IT AFFECTS OR PERTAINS TO THE NEW YORK BRANCH OR NEW YORK CUSTOMERS.

Sanction Details:

ON 1/29/19, SCB AND THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS") ENTERED INTO A CONSENT ORDER CONCERNING PAST CONTROL FAILURES AND IMPROPER CONDUCT IN ITS FOREIGN EXCHANGE ("FX") TRADING AND SALES BUSINESS BETWEEN 2007 AND 2013.

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AS PART OF THE CONSENT ORDER, STANDARD CHARTERED HAS AGREED



TO PAY A CIVIL MONETARY PENALTY OF USD40M TO THE DFS. STANDARD CHARTERED WILL TAKE A PRE-TAX CHARGE OF THIS AMOUNT AS PART OF ITS FULL-YEAR 2018 FINANCIAL RESULTS.

SINCE THE CONDUCT AT ISSUE TOOK PLACE, STANDARD CHARTERED HAS REMEDIATED ITS SYSTEMS AND CONTROLS, AND NOW HAS AN APPROPRIATE CONTROL FRAMEWORK IN PLACE. SCB CONTINUES TO MAKE IMPROVEMENTS AS APPROPRIATE TO ENSURE WE DRIVE THE HIGHEST STANDARDS OF CONDUCT AND COMPLIANCE. SCB WILL, PURSUANT TO THIS ORDER, BE REPORTING TO THE DFS ON THIS WORK. THIS MATTER IS UNRELATED TO THE ONGOING SANCTIONS INVESTIGATION BY THE US AUTHORITIES INTO HISTORICAL CONDUCT AND CONTROLS ISSUES, WHICH WAS FIRST DISCLOSED IN 2014. THE GROUP CONTINUES TO CO-OPERATE FULLY WITH AND IS ENGAGED IN CONSTRUCTIVE DISCUSSIONS WITH RELEVANT AUTHORITIES TO RESOLVE THAT INVESTIGATION AS SOON AS PRACTICABLE.

Firm Statement

ON 1/29/19, SCB AND THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS") ENTERED INTO A CONSENT ORDER CONCERNING PAST CONTROL FAILURES AND IMPROPER CONDUCT IN ITS FOREIGN EXCHANGE ("FX") TRADING AND SALES BUSINESS BETWEEN 2007 AND 2013.

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Disclosure 3 of 10

Reporting Source:	Firm
Affiliate:	STANDARD CHARTERED BANK
Current Status:	Final
Allegations:	<p>ON 18 DECEMBER 2017, THE HONG KONG SECURITIES AND FUTURES COMMISSION (SFC) ISSUED AN ANNOUNCEMENT IN WHICH IT REPRIMANDED AND FINED STANDARD CHARTERED SECURITIES (HONG KONG) LIMITED (SCSHK) HK\$2.6 MILLION (APPROXIMATELY US \$331K)FOR INTERNAL CONTROL FAILURES RELATING TO SHORT SELLING ORDERS AND BREACH OF THE SECURITIES AND FUTURES (FINANCIAL RESOURCES) RULES (FRR).</p> <p>SCSHK FAILED TO PUT IN PLACE ADEQUATE SYSTEM AND CONTROL PROCEDURES THAT RESULTED IN AT LEAST 61 INSTANCES OF REGULATORY BREACHES INVOLVING SHORT SALES EXECUTED BY 11 TRADERS FROM DIFFERENT TRADING DESKS FROM JANUARY 2014 TO AUGUST 2015. THE SFC ALSO FOUND THAT SCSHK MIS-INTERPRETED AND BREACHED THE FRR BY INCORRECTLY INCLUDING THE AMOUNTS RECEIVABLE FROM ITS CLEARING AGENT, AS LIQUID ASSETS IN ITS FINANCIAL RETURNS FOR JANUARY TO SEPTEMBER 2015.</p>
Initiated By:	HONG KONG SECURITIES AND FUTURES COMMISSION.
Date Initiated:	12/18/2017
Docket/Case Number:	N/A
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	12/18/2017
Sanctions Ordered:	Monetary/Fine \$331,000.00
Other Sanctions Ordered:	
Sanction Details:	ON 18 DECEMBER 2017, THE HONG KONG SECURITIES AND FUTURES COMMISSION (SFC) ISSUED AN ANNOUNCEMENT IN WHICH IT



REPRIMANDED AND FINED STANDARD CHARTERED SECURITIES (HONG KONG) LIMITED (SCSHK) HK\$2.6 MILLION (APPROXIMATELY US \$331K)FOR INTERNAL CONTROL FAILURES RELATING TO SHORT SELLING ORDERS AND BREACH OF THE SECURITIES AND FUTURES (FINANCIAL RESOURCES) RULES (FRR).

SCSHK FAILED TO PUT IN PLACE ADEQUATE SYSTEM AND CONTROL PROCEDURES THAT RESULTED IN AT LEAST 61 INSTANCES OF REGULATORY BREACHES INVOLVING SHORT SALES EXECUTED BY 11 TRADERS FROM DIFFERENT TRADING DESKS FROM JANUARY 2014 TO AUGUST 2015. THE SFC ALSO FOUND THAT SCSHK MIS-INTERPRETED AND BREACHED THE FRR BY INCORRECTLY INCLUDING THE AMOUNTS RECEIVABLE FROM ITS CLEARING AGENT, AS LIQUID ASSETS IN ITS FINANCIAL RETURNS FOR JANUARY TO SEPTEMBER 2015.

Firm Statement

ON 18 DECEMBER 2017, THE HONG KONG SECURITIES AND FUTURES COMMISSION (SFC) ISSUED AN ANNOUNCEMENT IN WHICH IT REPRIMANDED AND FINED STANDARD CHARTERED SECURITIES (HONG KONG) LIMITED (SCSHK) HK\$2.6 MILLION (APPROXIMATELY US \$331K)FOR INTERNAL CONTROL FAILURES RELATING TO SHORT SELLING ORDERS AND BREACH OF THE SECURITIES AND FUTURES (FINANCIAL RESOURCES) RULES (FRR).

SCSHK FAILED TO PUT IN PLACE ADEQUATE SYSTEM AND CONTROL PROCEDURES THAT RESULTED IN AT LEAST 61 INSTANCES OF REGULATORY BREACHES INVOLVING SHORT SALES EXECUTED BY 11 TRADERS FROM DIFFERENT TRADING DESKS FROM JANUARY 2014 TO AUGUST 2015. THE SFC ALSO FOUND THAT SCSHK MIS-INTERPRETED AND BREACHED THE FRR BY INCORRECTLY INCLUDING THE AMOUNTS RECEIVABLE FROM ITS CLEARING AGENT, AS LIQUID ASSETS IN ITS FINANCIAL RETURNS FOR JANUARY TO SEPTEMBER 2015.

Disclosure 4 of 10

Reporting Source: Firm

Affiliate: STANDARD CHARTERED BANK

Current Status: Final

Allegations: ON MARCH 19, 2018, THE MONETARY AUTHORITY OF SINGAPORE (MAS) ANNOUNCED THAT IT HAD IMPOSED PENALTIES OF SGD 5.2 MILLION (USD 3.95 MILLION) ON STANDARD CHARTERED SINGAPORE BRANCH (SCBS) AND SGD 1.2 MILLION (USD 900K) ON STANDARD CHARTERED TRUST (SINGAPORE) LIMITED (SCTS) FOR BREACHES OF MAS' ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FUNDING REQUIREMENTS. THE BREACHES OCCURRED WHEN TRUST ACCOUNTS OF SCBS'S CUSTOMERS-VALUED AT \$1.4 BILLION-WERE TRANSFERRED FROM STANDARD CHARTERED TRUST (GUERNSEY) TO SCTS FROM DECEMBER



2015 TO JANUARY 2016.

MAS FOUND SCBS'S AND SCTS' RISK MANAGEMENT AND CONTROLS IN RELATION TO THE TRANSFERS TO BE UNSATISFACTORY. THE TRANSFERS OCCURRED SHORTLY BEFORE GUERNSEY'S IMPLEMENTATION OF THE COMMON REPORTING STANDARDS (CRS) FOR THE AUTOMATIC EXCHANGE OF FINANCIAL ACCOUNT INFORMATION IN TAX MATTERS. THE TIMING OF THE TRANSFERS RAISED QUESTIONS OF WHETHER THE CLIENTS WERE ATTEMPTING TO AVOID THEIR CRS REPORTING OBLIGATIONS. THE MAS FOUND THAT SCBS AND SCTS DID NOT ADEQUATELY ASSESS AND MITIGATE AGAINST THIS RISK FACTOR, AND ALSO FAILED TO FILE SUSPICIOUS TRANSACTION REPORTS IN A TIMELY MANNER.

IN DETERMINING THE REGULATORY ACTION, MAS TOOK INTO CONSIDERATION MITIGATING FACTORS. SCBS PRO-ACTIVELY NOTIFIED MAS OF ITS INTERNAL REVIEW ON THE TRUST ACCOUNTS, AND SCBS AND SCTS MANAGEMENT SHOWED STRONG COMMITMENT TO ADDRESS THE DEFICIENCIES IDENTIFIED BY MAS. BOTH SCBS AND SCTS HAVE TAKEN PROMPT AND SUBSTANTIVE REMEDIAL MEASURES TO STRENGTHEN THEIR AML/CFT RISK MANAGEMENT AND CONTROLS.

Initiated By: THE MONETARY AUTHORITY OF SINGAPORE.

Date Initiated: 03/19/2018

Docket/Case Number: N/A

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 03/19/2018

Sanctions Ordered: Monetary/Fine \$4,800,000.00

Other Sanctions Ordered:

Sanction Details: ON MARCH 19, 2018, THE MONETARY AUTHORITY OF SINGAPORE (MAS) ANNOUNCED THAT IT HAD IMPOSED PENALTIES OF SGD 5.2 MILLION (USD 3.95 MILLION) ON STANDARD CHARTERED SINGAPORE BRANCH (SCBS) AND SGD 1.2 MILLION (USD 900K) ON STANDARD CHARTERED TRUST (SINGAPORE) LIMITED (SCTS) FOR BREACHES OF MAS' ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FUNDING REQUIREMENTS. THE



BREACHES OCCURRED WHEN TRUST ACCOUNTS OF SCBS'S CUSTOMERS-VALUED AT \$1.4 BILLION-WERE TRANSFERRED FROM STANDARD CHARTERED TRUST (GUERNSEY) TO SCTS FROM DECEMBER 2015 TO JANUARY 2016.

MAS FOUND SCBS'S AND SCTS' RISK MANAGEMENT AND CONTROLS IN RELATION TO THE TRANSFERS TO BE UNSATISFACTORY. THE TRANSFERS OCCURRED SHORTLY BEFORE GUERNSEY'S IMPLEMENTATION OF THE COMMON REPORTING STANDARDS (CRS) FOR THE AUTOMATIC EXCHANGE OF FINANCIAL ACCOUNT INFORMATION IN TAX MATTERS. THE TIMING OF THE TRANSFERS RAISED QUESTIONS OF WHETHER THE CLIENTS WERE ATTEMPTING TO AVOID THEIR CRS REPORTING OBLIGATIONS. THE MAS FOUND THAT SCBS AND SCTS DID NOT ADEQUATELY ASSESS AND MITIGATE AGAINST THIS RISK FACTOR, AND ALSO FAILED TO FILE SUSPICIOUS TRANSACTION REPORTS IN A TIMELY MANNER.

IN DETERMINING THE REGULATORY ACTION, MAS TOOK INTO CONSIDERATION MITIGATING FACTORS. SCBS PRO-ACTIVELY NOTIFIED MAS OF ITS INTERNAL REVIEW ON THE TRUST ACCOUNTS, AND SCBS AND SCTS MANAGEMENT SHOWED STRONG COMMITMENT TO ADDRESS THE DEFICIENCIES IDENTIFIED BY MAS. BOTH SCBS AND SCTS HAVE TAKEN PROMPT AND SUBSTANTIVE REMEDIAL MEASURES TO STRENGTHEN THEIR AML/CFT RISK MANAGEMENT AND CONTROLS.

Firm Statement

ON MARCH 19, 2018, THE MONETARY AUTHORITY OF SINGAPORE (MAS) ANNOUNCED THAT IT HAD IMPOSED PENALTIES OF SGD 5.2 MILLION (USD 3.95 MILLION) ON STANDARD CHARTERED SINGAPORE BRANCH (SCBS) AND SGD 1.2 MILLION (USD 900K) ON STANDARD CHARTERED TRUST (SINGAPORE) LIMITED (SCTS) FOR BREACHES OF MAS' ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FUNDING REQUIREMENTS. THE BREACHES OCCURRED WHEN TRUST ACCOUNTS OF SCBS'S CUSTOMERS-VALUED AT \$1.4 BILLION-WERE TRANSFERRED FROM STANDARD CHARTERED TRUST (GUERNSEY) TO SCTS FROM DECEMBER 2015 TO JANUARY 2016.

MAS FOUND SCBS'S AND SCTS' RISK MANAGEMENT AND CONTROLS IN RELATION TO THE TRANSFERS TO BE UNSATISFACTORY. THE TRANSFERS OCCURRED SHORTLY BEFORE GUERNSEY'S IMPLEMENTATION OF THE COMMON REPORTING STANDARDS (CRS) FOR THE AUTOMATIC EXCHANGE OF FINANCIAL ACCOUNT INFORMATION IN TAX MATTERS. THE TIMING OF THE TRANSFERS RAISED QUESTIONS OF WHETHER THE CLIENTS WERE ATTEMPTING TO AVOID THEIR CRS REPORTING OBLIGATIONS. THE MAS FOUND THAT SCBS AND SCTS DID NOT ADEQUATELY ASSESS AND MITIGATE AGAINST THIS RISK FACTOR, AND ALSO FAILED TO FILE SUSPICIOUS TRANSACTION REPORTS IN A TIMELY MANNER.

IN DETERMINING THE REGULATORY ACTION, MAS TOOK INTO CONSIDERATION MITIGATING FACTORS. SCBS PRO-ACTIVELY NOTIFIED



MAS OF ITS INTERNAL REVIEW ON THE TRUST ACCOUNTS, AND SCBS AND SCTS MANAGEMENT SHOWED STRONG COMMITMENT TO ADDRESS THE DEFICIENCIES IDENTIFIED BY MAS. BOTH SCBS AND SCTS HAVE TAKEN PROMPT AND SUBSTANTIVE REMEDIAL MEASURES TO STRENGTHEN THEIR AML/CFT RISK MANAGEMENT AND CONTROLS.

Disclosure 5 of 10

Reporting Source:	Firm
Affiliate:	STANDARD CHARTERED BANK
Current Status:	Final
Allegations:	PURSUANT TO AN OFFER OF SETTLEMENT IN WHICH STANDARD CHARTERED BANK ("SCB") NEITHER ADMITTED NOR DENIED THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, ON SEPTEMBER 12, 2016, A PANEL OF THE CHICAGO BOARD OF TRADE BUSINESS CONDUCT COMMITTEE ("PANEL") FOUND THAT SCB WAS SUBJECT TO THE JURISDICTION OF THE EXCHANGE PURSUANT TO RULES 402 AND 418. THE PANEL ALSO FOUND THAT ON SEVERAL OCCASIONS BETWEEN DECEMBER 2012 AND FEBRUARY 2013, TRADERS EMPLOYED BY SCB ENGAGED IN PRE-EXECUTION COMMUNICATIONS WITH TRADERS EMPLOYED BY A COUNTERPARTY ABOUT SOYBEAN FUTURES HEDGES ASSOCIATED WITH THE EXECUTION OF PREPAID SOYBEAN SWAP AGREEMENTS. WHILE PRE-EXECUTION COMMUNICATIONS ARE ALLOWED IN THE EXECUTION OF OFF-EXCHANGE PRIVATELY-NEGOTIATED TRANSACTIONS SUCH AS SWAP AGREEMENTS, THE PANEL FOUND THAT THE COMMUNICATIONS, WHICH SPECIFIED DETAILS SUCH AS THE CONTRACT, SIDE OF THE MARKET, TIME OF EXECUTION, PRICE AND QUANTITY TO BE EXECUTED, RELATED TO THE EXECUTION OF SOYBEAN FUTURES TRANSACTIONS ON GLOBEX. SUCH COMMUNICATIONS ARE NOT ALLOWED IN AGRICULTURAL FUTURES PRODUCTS, AND THE PANEL THUS CONCLUDED THAT SCB THEREBY VIOLATED CBOT RULE 539.A.
Initiated By:	CHICAGO BOARD OF TRADE.
Date Initiated:	09/14/2016
Docket/Case Number:	CBOT 13-9442-BC
Principal Product Type:	Futures - Commodity
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)



Other Sanction(s)/Relief Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 09/14/2016

Sanctions Ordered: Monetary/Fine \$75,000.00

Other Sanctions Ordered:

Sanction Details: PURSUANT TO AN OFFER OF SETTLEMENT IN WHICH STANDARD CHARTERED BANK ("SCB") NEITHER ADMITTED NOR DENIED THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, ON SEPTEMBER 12, 2016, A PANEL OF THE CHICAGO BOARD OF TRADE BUSINESS CONDUCT COMMITTEE ("PANEL") FOUND THAT SCB WAS SUBJECT TO THE JURISDICTION OF THE EXCHANGE PURSUANT TO RULES 402 AND 418. THE PANEL ALSO FOUND THAT ON SEVERAL OCCASIONS BETWEEN DECEMBER 2012 AND FEBRUARY 2013, TRADERS EMPLOYED BY SCB ENGAGED IN PRE-EXECUTION COMMUNICATIONS WITH TRADERS EMPLOYED BY A COUNTERPARTY ABOUT SOYBEAN FUTURES HEDGES ASSOCIATED WITH THE EXECUTION OF PREPAID SOYBEAN SWAP AGREEMENTS. WHILE PRE-EXECUTION COMMUNICATIONS ARE ALLOWED IN THE EXECUTION OF OFF-EXCHANGE PRIVATELY-NEGOTIATED TRANSACTIONS SUCH AS SWAP AGREEMENTS, THE PANEL FOUND THAT THE COMMUNICATIONS, WHICH SPECIFIED DETAILS SUCH AS THE CONTRACT, SIDE OF THE MARKET, TIME OF EXECUTION, PRICE AND QUANTITY TO BE EXECUTED, RELATED TO THE EXECUTION OF SOYBEAN FUTURES TRANSACTIONS ON GLOBEX. SUCH COMMUNICATIONS ARE NOT ALLOWED IN AGRICULTURAL FUTURES PRODUCTS, AND THE PANEL THUS CONCLUDED THAT SCB THEREBY VIOLATED CBOT RULE 539.A. IN ACCORDANCE WITH THE SETTLEMENT OFFER, THE PANEL ORDERED SCB TO PAY A FINE OF \$75,000.

Disclosure 6 of 10

Reporting Source: Firm

Affiliate: STANDARD CHARTERED BANK

Current Status: Final

Allegations: ON AUGUST 19, 2014, SCB AND THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS") ENTERED INTO A NEW CONSENT ORDER BASED ON A REPORT MADE BY THE SCB MONITOR TO THE DFS APPOINTED UNDER A PREVIOUS CONSENT ORDER WITH THE DFS, DATED SEPTEMBER 21, 2012, WHICH NOTED SIGNIFICANT FAILURES IN SCB NY'S ANTI-MONEY LAUNDERING ("AML") TRANSACTION MONITORING SYSTEM.



IN THIS CONSENT ORDER, IT WAS AGREED AND STIPULATED THAT SCB WOULD UNDERTAKE THE FOLLOWING MEASURES TO ENSURE COMPLIANCE WITH THE ORIGINAL SEPTEMBER 21, 2012 CONSENT ORDER AND ALL APPLICABLE BANK SECRECY ACT/AML REQUIREMENTS:

- ?PAYMENT OF A \$300 MILLION CIVIL MONETARY PENALTY;
- ?IMPLEMENTATION OF AN EFFECTIVE TRANSACTION MONITORING SYSTEM SUBJECT TO THE APPROVAL OF THE DFS;
- ?PREPARATION OF A COMPREHENSIVE REMEDIATION ACTION PLAN;
- ?FURTHER INTEGRATION OF THE SCB MONITOR INTO THE REMEDIATION PROCESS;
- ?A CLEAR ORGANIZATIONAL STRUCTURE OF THE EMPLOYEES INVOLVED IN THE REMEDIATION;
- ?APPOINTMENT OF A COMPETENT AND RESPONSIBLE SCB EXECUTIVE TO OVERSEE THE REMEDIATION WITH A DIRECT REPORTING LINE TO THE SCB CEO;
- ?EXTENSION OF THE PERIOD OF ENGAGEMENT OF THE SCB MONITOR FOR TWO ADDITIONAL YEARS;
- ?PROHIBITION ON THE OPENING OF NEW U.S. DOLLAR DENOMINATED ACCOUNTS BY SCB NY WITHOUT THE PRIOR APPROVAL OF THE DFS AND SCB MONITOR;
- ?NEW POLICIES FOR U.S. DOLLAR TRANSACTIONS WITH RESPECT TO ORIGINATOR/BENEFICIARY INFORMATION;
- ?SUSPENSION OF U.S. DOLLAR CLEARING SERVICES FOR SCB HONG KONG HIGH-RISK RETAIL BUSINESS CLIENTS;
- ?MONTHLY REVIEW BY THE SCB MONITOR OF THE RISKS ASSOCIATED WITH U.S. DOLLAR TRANSACTIONS FROM THE SCB HONG KONG RETAIL BUSINESS CLIENTS TO DETERMINE WHETHER ADDITIONAL MONITORING OR DE-RISKING IS NECESSARY; AND
- ?IMPLEMENTATION OF HEIGHTENED MONITORING OF CERTAIN HIGH-RISK CLIENTS, AND THE EXITING OF CERTAIN SMALL AND MEDIUM BUSINESS CLIENTS, IN THE SCB UAE SME PORTFOLIO.

THESE PROVISIONS REMAIN EFFECTIVE AND ENFORCEABLE UNTIL STAYED, MODIFIED, TERMINATED OR SUSPENDED IN WRITING BY THE DFS.

Initiated By: THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES.

Date Initiated: 08/19/2014

Docket/Case Number:

Principal Product Type: No Product

Other Product Type(s): N/A

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief CONSENT ORDER

**Sought:****Resolution:** Consent**Resolution Date:** 04/09/2019**Sanctions Ordered:** Monetary/Fine \$947,000,000.00**Other Sanctions Ordered:** CERTAIN REMEDIATION MEASURES AS DESCRIBED IN THE SUMMARY BELOW.

Sanction Details: STANDARD CHARTERED PLC (THE "GROUP") ANNOUNCES THAT IT HAS RESOLVED THE PREVIOUSLY DISCLOSED INVESTIGATIONS BY THE U.S. DEPARTMENT OF JUSTICE ("DOJ"), THE OFFICE OF THE DISTRICT ATTORNEY FOR NEW YORK COUNTY ("DANY"), THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS"), THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM AND THE U.S. TREASURY'S OFFICE OF FOREIGN ASSETS CONTROL (TOGETHER, THE "U.S. AGENCIES") AND THE U.K. FINANCIAL CONDUCT AUTHORITY ("FCA") INTO ITS HISTORICAL SANCTIONS COMPLIANCE AND FINANCIAL CRIME CONTROLS.

UNDER THE TERMS OF THE RESOLUTIONS, THE GROUP WILL PAY A TOTAL OF \$947 MILLION IN MONETARY PENALTIES TO THE U.S. AGENCIES AND £102 MILLION TO THE FCA. THE GROUP TOOK A \$900 MILLION PROVISION WHICH INCLUDED THESE MATTERS IN THE FOURTH QUARTER OF 2018 AND WILL TAKE A FURTHER AND FINAL CHARGE OF \$190 MILLION IN THE FIRST QUARTER OF 2019. THE GROUP'S DEFERRED PROSECUTION AGREEMENTS WITH THE DOJ AND DANY HAVE BEEN EXTENDED TO 9 APRIL 2021. THE RESOLUTIONS INCLUDE NO NEW COMPLIANCE MONITORSHIPS AND THE MONITORSHIPS PREVIOUSLY IMPOSED BY THE DFS AND THE DOJ WERE TERMINATED ON 31 DECEMBER 2018 AND 31 MARCH 2019, RESPECTIVELY.

Firm Statement

STANDARD CHARTERED PLC (THE "GROUP") ANNOUNCES THAT IT HAS RESOLVED THE PREVIOUSLY DISCLOSED INVESTIGATIONS BY THE U.S. DEPARTMENT OF JUSTICE ("DOJ"), THE OFFICE OF THE DISTRICT ATTORNEY FOR NEW YORK COUNTY ("DANY"), THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS"), THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM AND THE U.S. TREASURY'S OFFICE OF FOREIGN ASSETS CONTROL (TOGETHER, THE "U.S. AGENCIES") AND THE U.K. FINANCIAL CONDUCT AUTHORITY ("FCA") INTO ITS HISTORICAL SANCTIONS COMPLIANCE AND FINANCIAL CRIME CONTROLS.

UNDER THE TERMS OF THE RESOLUTIONS, THE GROUP WILL PAY A TOTAL OF \$947 MILLION IN MONETARY PENALTIES TO THE U.S. AGENCIES AND £102 MILLION TO THE FCA. THE GROUP TOOK A \$900 MILLION PROVISION



WHICH INCLUDED THESE MATTERS IN THE FOURTH QUARTER OF 2018 AND WILL TAKE A FURTHER AND FINAL CHARGE OF \$190 MILLION IN THE FIRST QUARTER OF 2019. THE GROUP'S DEFERRED PROSECUTION AGREEMENTS WITH THE DOJ AND DANY HAVE BEEN EXTENDED TO 9 APRIL 2021. THE RESOLUTIONS INCLUDE NO NEW COMPLIANCE MONITORSHIPS AND THE MONITORSHIPS PREVIOUSLY IMPOSED BY THE DFS AND THE DOJ WERE TERMINATED ON 31 DECEMBER 2018 AND 31 MARCH 2019, RESPECTIVELY.

Disclosure 7 of 10

Reporting Source:	Firm
Affiliate:	STANDARD CHARTERED BANK, SINGAPORE
Current Status:	Final
Allegations:	<p>THE MONETARY AUTHORITY OF SINGAPORE CONDUCTED A YEAR-LONG REVIEW OF THE PROCESSES/Framework RELATING TO BANKS' BENCHMARK SUBMISSIONS. BASED ON ITS FINDINGS, MAS HAS TAKEN A RANGE OF SUPERVISORY ACTIONS AGAINST BANKS FOR DEFICIENCIES IN THE GOVERNANCE, RISK MANAGEMENT, INTERNAL CONTROLS, AND SURVEILLANCE SYSTEMS, RELATING TO THESE PROCESSES. MAS' REVIEW COVERED THE SINGAPORE DOLLAR INTEREST RATE BENCHMARKS - THE SINGAPORE INTERBANK OFFERED RATES (SIBOR) AND SWAP OFFERED RATES (SOR) - AND THE FOREIGN EXCHANGE SPOT BENCHMARKS (FX BENCHMARKS) THAT ARE COMMONLY USED TO SETTLE NON-DELIVERABLE FORWARD FX CONTRACTS, OVER THE PERIOD FROM 2007 TO 2011.</p> <p>SCB ALONG WITH NINETEEN OTHER BANKS WERE FOUND TO HAVE DEFICIENCIES IN THE GOVERNANCE, RISK MANAGEMENT, INTERNAL CONTROLS, AND SURVEILLANCE SYSTEMS FOR THEIR INVOLVEMENT IN BENCHMARK SUBMISSIONS. MAS HAS CENSURED THESE BANKS AND DIRECTED THEM TO ADOPT MEASURES TO ADDRESS THEIR DEFICIENCIES. THE BANKS ARE REQUIRED TO REPORT THEIR PROGRESS TO MAS ON A QUARTERLY BASIS, AND CONDUCT INDEPENDENT REVIEWS TO ENSURE THE ROBUSTNESS OF THEIR REMEDIAL MEASURES. THE BANKS ARE REQUIRED TO SET ASIDE ADDITIONAL STATUTORY RESERVES WITH MAS AT ZERO INTEREST FOR A PERIOD OF ONE YEAR. THE DURATION FOR WHICH THE ADDITIONAL STATUTORY RESERVES ARE TO BE PLACED WITH MAS MAY BE VARIED DEPENDING ON MAS' ASSESSMENT OF THE ADEQUACY OF THE MEASURES PUT IN PLACE BY EACH BANK TO ADDRESS THE DEFICIENCIES AND RISKS IDENTIFIED. MAS' SUPERVISORY ACTIONS AGAINST THE BANKS ARE CALIBRATED ACCORDING TO THE SEVERITY OF ATTEMPTS BY TRADERS IN THESE BANKS TO INAPPROPRIATELY INFLUENCE FINANCIAL BENCHMARKS. THIS INCLUDES</p>



CONSIDERATION OF THE NUMBER OF TRADERS WITHIN THE BANK WHO ATTEMPTED TO INAPPROPRIATELY INFLUENCE BENCHMARKS, WHETHER TRADERS FROM OTHER BANKS WERE INVOLVED, AND THE NUMBER OF TIMES THESE ATTEMPTS OCCURRED. MAS HAS ALSO CONSIDERED SUPERVISORY ACTIONS TAKEN BY OTHER REGULATORS FOR DEFICIENCIES RELATING TO THE LONDON INTERBANK OFFERED RATE BENCHMARK SUBMISSIONS, AND THE SIZE OF THE SINGAPORE MARKET RELATIVE TO OTHER MARKETS.

THE MAS FINDINGS CONCLUDED THAT SIBOR, SOR AND FX BENCHMARKS WERE SUCCESSFULLY MANIPULATED; THE TRADERS' CONDUCT REFLECTED A LACK OF PROFESSIONAL ETHICS.

Initiated By: THE MONETARY AUTHORITY OF SINGAPORE.

Date Initiated: 06/14/2013

Docket/Case Number:

Principal Product Type: Other

Other Product Type(s): FX

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 06/14/2013

Sanctions Ordered: Censure

Other Sanctions Ordered:

Sanction Details: N/A

Disclosure 8 of 10

Reporting Source: Firm

Affiliate: STANDARD CHARTERED BANK

Current Status: Final

Allegations: ACCORDING TO THE SETTLEMENT AGREEMENT BETWEEN OFAC AND SCB, ACCORDING TO THE DECEMBER 10, 2012 CIVIL PENALTY ORDER AND CEASE AND DESIST ORDER, DURING THE PERIOD EARLY 2001 THROUGH 2007, SCB DEVELOPED AND IMPLEMENTED POLICIES AND PROCEDURES FOR PROCESSING CERTAIN U.S. DOLLAR-DENOMINATED FUNDS



TRANSFERS THROUGH SCB'S NEW YORK BRANCH INVOLVING PARTIES SUBJECT TO SANCTIONS ADMINISTERED BY OFAC, SPECIFICALLY, CERTAIN IRANIAN CUSTOMERS AND BENEFICIARIES. SCB PERSONNEL OMITTED INFORMATION FROM THE PAYMENT MESSAGES THAT WAS NECESSARY FOR THE NY BRANCH TO DETERMINE WHETHER THESE TRANSACTIONS WERE CARRIED OUT IN A MANNER CONSISTENT WITH U.S. LAW.

IN 2004, THE BANK AND THE NY BRANCH ENTERED INTO AN AGREEMENT ("WRITTEN AGREEMENT") WITH THE FEDERAL RESERVE BANK OF NEW YORK AND THE NEW YORK STATE BANKING DEPARTMENT ("NYSBD") THAT REQUIRED IMPROVEMENTS IN COMPLIANCE WITH APPLICABLE FEDERAL AND STATE LAWS, RULES, AND REGULATIONS RELATING TO ANTI-MONEY LAUNDERING.

IN 2005 AND 2006, WHILE STILL UNDER THE WRITTEN AGREEMENT, THE NY BRANCH ENGAGED IN UNSAFE AND UNSOUND PRACTICES BY PROVIDING INADEQUATE AND INCOMPLETE RESPONSES TO EXAMINER INQUIRIES RELATING TO THE TRANSMISSION OF FUNDS TO AND FROM PARTIES SUBJECT TO OFAC SANCTIONS. SCB ALSO PROVIDED INCOMPLETE AND MISLEADING INFORMATION TO EXAMINERS REGARDING THE SCALE OF AND PRACTICES FOR PROCESSING SCB'S AND THE NY BRANCH'S U.S. DOLLAR CLEARING TRANSACTIONS, PARTICULARLY WITH REGARD TO IRANIAN CUSTOMERS.

Initiated By:	BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM.
Date Initiated:	12/10/2012
Docket/Case Number:	N/A
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	IN THE DECEMBER 10, 2012 ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY, THE BOARD OF GOVERNORS IMPOSED A CIVIL PENALTY ON STANDARD CHARTERED BANK ("SCB") IN THE AMOUNT OF \$100 MILLION. IN THE DECEMBER 10, 2012 CEASE AND DESIST ORDER, SCB IS ORDERED TO SUBMIT TO THE BOARD OF GOVERNORS AND FSA ACCEPTABLE COMPLIANCE PROGRAMS ADDRESSING COMPLIANCE WITH ALL BSA/AML REQUIREMENTS AND OFAC REGULATIONS AND MUST ALSO COMPLETE AUDITS OF GLOBAL OFAC COMPLIANCE AND THE NY BRANCH'S COMPLIANCE WITH BSA/AML REQUIREMENTS.
Resolution:	Settled
Resolution Date:	04/09/2019



Sanctions Ordered: Monetary/Fine \$947,000,000.00

Other Sanctions Ordered:

Sanction Details:

PURSUANT TO THE CIVIL PENALTY ORDER, THE BOARD OF GOVERNORS STANDARD CHARTERED PLC (THE "GROUP") ANNOUNCES THAT IT HAS RESOLVED THE PREVIOUSLY DISCLOSED INVESTIGATIONS BY THE U.S. DEPARTMENT OF JUSTICE ("DOJ"), THE OFFICE OF THE DISTRICT ATTORNEY FOR NEW YORK COUNTY ("DANY"), THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS"), THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM AND THE U.S. TREASURY'S OFFICE OF FOREIGN ASSETS CONTROL (TOGETHER, THE "U.S. AGENCIES") AND THE U.K. FINANCIAL CONDUCT AUTHORITY ("FCA") INTO ITS HISTORICAL SANCTIONS COMPLIANCE AND FINANCIAL CRIME CONTROLS.

UNDER THE TERMS OF THE RESOLUTIONS, THE GROUP WILL PAY A TOTAL OF \$947 MILLION IN MONETARY PENALTIES TO THE U.S. AGENCIES AND £102 MILLION TO THE FCA. THE GROUP TOOK A \$900 MILLION PROVISION WHICH INCLUDED THESE MATTERS IN THE FOURTH QUARTER OF 2018 AND WILL TAKE A FURTHER AND FINAL CHARGE OF \$190 MILLION IN THE FIRST QUARTER OF 2019. THE GROUP'S DEFERRED PROSECUTION AGREEMENTS WITH THE DOJ AND DANY HAVE BEEN EXTENDED TO 9 APRIL 2021. THE RESOLUTIONS INCLUDE NO NEW COMPLIANCE MONITORSHIPS AND THE MONITORSHIPS PREVIOUSLY IMPOSED BY THE DFS AND THE DOJ WERE TERMINATED ON 31 DECEMBER 2018 AND 31 MARCH 2019, RESPECTIVELY.

Firm Statement

STANDARD CHARTERED PLC (THE "GROUP") ANNOUNCES THAT IT HAS RESOLVED THE PREVIOUSLY DISCLOSED INVESTIGATIONS BY THE U.S. DEPARTMENT OF JUSTICE ("DOJ"), THE OFFICE OF THE DISTRICT ATTORNEY FOR NEW YORK COUNTY ("DANY"), THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS"), THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM AND THE U.S. TREASURY'S OFFICE OF FOREIGN ASSETS CONTROL (TOGETHER, THE "U.S. AGENCIES") AND THE U.K. FINANCIAL CONDUCT AUTHORITY ("FCA") INTO ITS HISTORICAL SANCTIONS COMPLIANCE AND FINANCIAL CRIME CONTROLS.

UNDER THE TERMS OF THE RESOLUTIONS, THE GROUP WILL PAY A TOTAL OF \$947 MILLION IN MONETARY PENALTIES TO THE U.S. AGENCIES AND £102 MILLION TO THE FCA. THE GROUP TOOK A \$900 MILLION PROVISION WHICH INCLUDED THESE MATTERS IN THE FOURTH QUARTER OF 2018 AND WILL TAKE A FURTHER AND FINAL CHARGE OF \$190 MILLION IN THE FIRST QUARTER OF 2019. THE GROUP'S DEFERRED PROSECUTION AGREEMENTS WITH THE DOJ AND DANY HAVE BEEN EXTENDED TO 9 APRIL 2021. THE RESOLUTIONS INCLUDE NO NEW COMPLIANCE



MONITORSHIPS AND THE MONITORSHIPS PREVIOUSLY IMPOSED BY THE DFS AND THE DOJ WERE TERMINATED ON 31 DECEMBER 2018 AND 31 MARCH 2019, RESPECTIVELY.

Disclosure 9 of 10

Reporting Source:	Firm
Affiliate:	STANDARD CHARTERED BANK
Current Status:	Final
Allegations:	<p>STANDARD CHARTERED PLC (THE "GROUP") ANNOUNCES THAT IT HAS RESOLVED THE PREVIOUSLY DISCLOSED INVESTIGATIONS BY THE U.S. DEPARTMENT OF JUSTICE ("DOJ"), THE OFFICE OF THE DISTRICT ATTORNEY FOR NEW YORK COUNTY ("DANY"), THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS"), THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM AND THE U.S. TREASURY'S OFFICE OF FOREIGN ASSETS CONTROL (TOGETHER, THE "U.S. AGENCIES") AND THE U.K. FINANCIAL CONDUCT AUTHORITY ("FCA") INTO ITS HISTORICAL SANCTIONS COMPLIANCE AND FINANCIAL CRIME CONTROLS.</p> <p>UNDER THE TERMS OF THE RESOLUTIONS, THE GROUP WILL PAY A TOTAL OF \$947 MILLION IN MONETARY PENALTIES TO THE U.S. AGENCIES AND £102 MILLION TO THE FCA. THE GROUP TOOK A \$900 MILLION PROVISION WHICH INCLUDED THESE MATTERS IN THE FOURTH QUARTER OF 2018 AND WILL TAKE A FURTHER AND FINAL CHARGE OF \$190 MILLION IN THE FIRST QUARTER OF 2019. THE GROUP'S DEFERRED PROSECUTION AGREEMENTS WITH THE DOJ AND DANY HAVE BEEN EXTENDED TO 9 APRIL 2021. THE RESOLUTIONS INCLUDE NO NEW COMPLIANCE MONITORSHIPS AND THE MONITORSHIPS PREVIOUSLY IMPOSED BY THE DFS AND THE DOJ WERE TERMINATED ON 31 DECEMBER 2018 AND 31 MARCH 2019, RESPECTIVELY.</p>
Initiated By:	THE OFFICE OF FOREIGN ASSETS CONTROL. (OFAC)
Date Initiated:	12/10/2012
Docket/Case Number:	N/A
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief	STANDARD CHARTERED PLC (THE "GROUP") ANNOUNCES THAT IT HAS



Sought: RESOLVED THE PREVIOUSLY DISCLOSED INVESTIGATIONS BY THE U.S. DEPARTMENT OF JUSTICE ("DOJ"), THE OFFICE OF THE DISTRICT ATTORNEY FOR NEW YORK COUNTY ("DANY"), THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS"), THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM AND THE U.S. TREASURY'S OFFICE OF FOREIGN ASSETS CONTROL (TOGETHER, THE "U.S. AGENCIES") AND THE U.K. FINANCIAL CONDUCT AUTHORITY ("FCA") INTO ITS HISTORICAL SANCTIONS COMPLIANCE AN

Resolution: Settled

Resolution Date: 04/09/2019

Sanctions Ordered: Monetary/Fine \$947,000,000.00

Other Sanctions Ordered:

Sanction Details: IN THE SETTLEMENT AGREEMENT, SCB AGREED TO PAY \$132 MILLION TO OFAC FOR ANY CIVIL LIABILITY OUT OF THE APPARENT VIOLATIONS DESCRIBED ABOVE. PURSUANT TO THE AGREEMENT, SCB'S OBLIGATION TO PAY SUCH SETTLEMENT AMOUNT TO OFAC IS SATISFIED WHEN SCB REMITS PAYMENT OF \$227 MILLION TO THE UNITED STATES DEPARTMENT OF JUSTICE.

IN ADDITION, SCB MUST PROVIDE TO OFAC COPIES OF ALL SUBMISSIONS IT MAKES TO THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM PURSUANT TO THE DECEMBER 10, 2012 ORDER TO CEASE AND DESIST ISSUED UPON CONSENT PURSUANT TO THE FEDERAL DEPOSIT INSURANCE ACT, AS AMENDED. THESE SUBMISSIONS INCLUDE AN ACCEPTABLE COMPLIANCE PROGRAM TO ENSURE COMPLIANCE WITH ALL BANK SECRECY ACT AND ANTI-MONEY-LAUNDERING ("BSA/AML") REQUIREMENTS, OFAC REGULATIONS, AND LAWS AND REGULATIONS GOVERNING SUSPICIOUS ACTIVITY REPORTING. SCB MUST PROVIDE OFAC WITH THE RESULTS OF THE GLOBAL OFAC-COMPLIANCE AUDIT AND THE REVIEW OF SCB'S NY BRANCH'S BSA/AML COMPLIANCE CONDUCTED BY INDEPENDENT CONSULTANTS. IN ADDITION, SCB MUST SUBMIT AN ACCEPTABLE RISK-BASED AUDIT PROGRAM TO TEST THE NY BRANCH'S COMPLIANCE WITH BSA/AML REQUIREMENTS AND OFAC REGULATIONS TO BE PERFORMED ON A REGULAR BASIS.

Firm Statement STANDARD CHARTERED PLC (THE "GROUP") ANNOUNCES THAT IT HAS RESOLVED THE PREVIOUSLY DISCLOSED INVESTIGATIONS BY THE U.S. DEPARTMENT OF JUSTICE ("DOJ"), THE OFFICE OF THE DISTRICT ATTORNEY FOR NEW YORK COUNTY ("DANY"), THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS"), THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM AND THE U.S. TREASURY'S OFFICE OF FOREIGN ASSETS CONTROL (TOGETHER, THE "U.S. AGENCIES") AND THE U.K. FINANCIAL CONDUCT AUTHORITY ("FCA") INTO ITS HISTORICAL SANCTIONS COMPLIANCE AND FINANCIAL CRIME



CONTROLS.

UNDER THE TERMS OF THE RESOLUTIONS, THE GROUP WILL PAY A TOTAL OF \$947 MILLION IN MONETARY PENALTIES TO THE U.S. AGENCIES AND £102 MILLION TO THE FCA. THE GROUP TOOK A \$900 MILLION PROVISION WHICH INCLUDED THESE MATTERS IN THE FOURTH QUARTER OF 2018 AND WILL TAKE A FURTHER AND FINAL CHARGE OF \$190 MILLION IN THE FIRST QUARTER OF 2019. THE GROUP'S DEFERRED PROSECUTION AGREEMENTS WITH THE DOJ AND DANY HAVE BEEN EXTENDED TO 9 APRIL 2021. THE RESOLUTIONS INCLUDE NO NEW COMPLIANCE MONITORSHIPS AND THE MONITORSHIPS PREVIOUSLY IMPOSED BY THE DFS AND THE DOJ WERE TERMINATED ON 31 DECEMBER 2018 AND 31 MARCH 2019, RESPECTIVELY.

Disclosure 10 of 10

Reporting Source: Firm

Affiliate: STANDARD CHARTERED BANK

Current Status: Final

Allegations: ON AUGUST 6, 2012, VIA ORDER PURSUANT TO NYBL SECTION 39 ("AUGUST 6 ORDER"), THE DFS ALLEGED THAT SCB, THE PARENT COMPANY OF THE REGISTRANT, DURING THE PERIOD 2001 THROUGH 2007, ENGAGED IN A PRACTICE OF INAPPROPRIATELY OMITTING CERTAIN INFORMATION RELATING TO IRANIAN CLIENTS WHEN CLEARING U.S. DOLLAR TRANSACTIONS TO ENSURE THE AUTOMATIC AND UNOBSTRUCTED CLEARANCE OF THESE TRANSACTIONS IN NEW YORK. ACCORDING TO THE DEPARTMENT, BY OMITTING REFERENCE TO CERTAIN IRANIAN CLIENTS IN "U-TURN" TRANSACTIONS (A TRANSACTION IN WHICH A NON-U.S. COMPANY MAKES A PAYMENT TO ANOTHER NON-U.S. COMPANY AND THE FUNDS PASS THROUGH A UNITED STATES BANK), THE TRANSACTIONS AVOIDED REGULATORY REVIEW CONDUCTED IN ACCORDANCE WITH REQUIREMENTS OF THE U.S. OFFICE OF FOREIGN ASSETS CONTROL ("OFAC"). THE DEPARTMENT ALSO ALLEGED THAT (I) IN CONNECTION WITH A 2004 REVIEW OF SCB'S ANTI-MONEY LAUNDERING COMPLIANCE PROGRAM, SCB PROVIDED FALSE INFORMATION TO THE DEPARTMENT TO AVOID THE DEPARTMENT'S NOTICE OF SCB'S PRACTICE WITH RESPECT TO U-TURN TRANSACTIONS INVOLVING IRANIAN CLIENTS AND (II) IN 2006, IN RESPONSE TO A DFS REQUEST FOR STATISTICS OF SCB'S INVOLVEMENT IN U-TURN TRANSACTIONS ON BEHALF OF IRANIAN CLIENTS OVER A 12-MONTH PERIOD, SCB PROVIDED INCOMPLETE AND INACCURATE INFORMATION IN AN EFFORT TO DISGUISE THE EXTENT OF ITS INVOLVEMENT IN CLEARING U.S. DOLLAR TRANSACTIONS FOR IRANIAN CLIENTS. PREMISED ON THE FOREGOING ALLEGED



MISCONDUCT, DFS ASSERTED THAT SCB VIOLATED THE FOLLOWING RULES AND REGULATIONS: NYBL § 200-C (FAILURE TO MAINTAIN ACCURATE BOOKS AND RECORDS); NEW YORK PENAL LAW ("NYPL") § 195.05 (OBSTRUCTING GOVERNMENTAL ADMINISTRATION); NEW YORK CODES, RULES, AND REGULATIONS, § 300.1 (FAILURE TO REPORT CRIMES AND MISCONDUCT); NYBL § 572.1 (FALSIFICATION OF BOOKS AND REPORTS); NYPL § 175.35 (OFFERING FALSE INSTRUMENT FOR FILING); NYPL § 175.10 (FALSIFYING BUSINESS RECORDS); AND 31 C.F.R. 560.516 (UNAUTHORIZED IRANIAN TRANSACTIONS). THE DEPARTMENT ORDERED SCB TO APPEAR BEFORE IT ON AUGUST 15, 2012 TO RESPOND TO THE ALLEGATIONS.

Initiated By: NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES.

Date Initiated: 09/21/2012

Docket/Case Number:

Principal Product Type: Other

Other Product Type(s): N/A

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: IN THE SEPTEMBER 21, 2012 CONSENT ORDER ("SEPTEMBER 21 ORDER"), STANDARD CHARTERED BANK ("SCB") AGREED TO PAY A CIVIL MONETARY PAYMENT TO THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS" OR "DEPARTMENT") PURSUANT TO NEW YORK BANKING LAW §§ 44 AND 44-A IN THE AMOUNT OF \$340 MILLION. SCB HAS NEITHER ADMITTED NOR DENIED THE FINDINGS OF THE DFS SET FORTH IN THE SEPTEMBER 21 ORDER.

Resolution: Settled

Resolution Date: 09/21/2012

Sanctions Ordered: Monetary/Fine \$340,000,000.00

Other Sanctions Ordered: IN THE CONSENT ORDER, SCB AGREED TO ENGAGE AN INDEPENDENT ON-SITE MONITOR TO: (1) CONDUCT A COMPREHENSIVE REVIEW ("COMPLIANCE REVIEW") OF THE BSA/AML AND OFAC COMPLIANCE PROGRAMS, POLICIES, AND PROCEDURES NOW IN PLACE AT SCB'S NEW YORK BRANCH (THE "SCB NY PROGRAM"); (2) BASED ON THE COMPLIANCE REVIEW, IDENTIFY NEEDED CORRECTIVE MEASURES TO ADDRESS IDENTIFIED FLAWS, WEAKNESSES OR OTHER DEFICIENCIES IN THE SCB NY PROGRAM, AND OVERSEE THEIR IMPLEMENTATION; AND (3) EXAMINE AND ASSESS SCB NEW YORK BRANCH'S COMPLIANCE WITH THOSE CORRECTIVE MEASURES.



Sanction Details:

STANDARD CHARTERED BANK REMITTED THE PAYMENT ON SEPTEMBER 27TH 2012 AND, IN ACCORDANCE WITH THE SEPTEMBER 21, 2012 CONSENT ORDER, IS IN THE PROCESS OF ENGAGING AN INDEPENDENT ON-SITE MONITOR FOR THE PURPOSES SET FORTH IN ITEM 12B. THE TERM OF THE ENGAGEMENT OF THE SCB MONITOR SHALL BE EXTENDED UNTIL DECEMBER 31ST 2018 AS PER 4/21/17 SUPPLEMENTAL CONSENT ORDER.
BE EXTENDED-12/31/18.

Firm Statement

THIS IS A DUPLICATE DRP, PLEASE ARCHIVE. CURRENT OCCURRENCE NUMBER IS 1722793.



Criminal - Final Disposition

Disclosure 1 of 1

Reporting Source:	Firm
Affiliate:	STANDARD CHARTERED BANK
Current Status:	Final
Status Date:	4/9/2019
Charge Details:	<p>BY INFORMATION FILED ON DECEMBER 10, 2012, THE UNITED STATES DEPARTMENT OF JUSTICE ("DOJ") CHARGED STANDARD CHARTERED BANK ("SCB") A SINGLE COUNT OF KNOWINGLY AND WILLFULLY CONSPIRING, IN VIOLATION OF TITLE 18, SECTION 371 TO ENGAGE IN TRANSACTIONS WITH ENTITIES ASSOCIATED WITH SANCTIONED COUNTRIES, INCLUDING IRAN, SUDAN, LIBYA, AND BURMA, IN VIOLATION OF THE INTERNATIONAL EMERGENCY ECONOMIC POWER ACT, TITLE 50, UNITED STATES CODE, SECTION 1705, AND REGULATIONS ISSUED THEREUNDER. THIS CHARGE IS A FELONY.</p> <p>AS DESCRIBED MORE FULLY BELOW, SCB AND THE DOJ ENTERED INTO A DEFERRED PROSECUTION AGREEMENT ON DECEMBER 10, 2012.</p>
Felony:	Yes
Court Details:	<p>INFORMATION FILED IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA</p> <p>DOCKET NO. 1:12-CR-00262-JEB.</p>
Charge Date:	12/10/2012
Disposition Details:	<p>EFFECTIVE APRIL 9TH 2019, STANDARD CHARTERED PLC (THE "GROUP") ANNOUNCES THAT IT HAS RESOLVED THE PREVIOUSLY DISCLOSED INVESTIGATIONS BY THE U.S. DEPARTMENT OF JUSTICE ("DOJ"), THE OFFICE OF THE DISTRICT ATTORNEY FOR NEW YORK COUNTY ("DANY"), THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS"), THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM AND THE U.S. TREASURY'S OFFICE OF FOREIGN ASSETS CONTROL (TOGETHER, THE "U.S. AGENCIES") AND THE U.K. FINANCIAL CONDUCT AUTHORITY ("FCA") INTO ITS HISTORICAL SANCTIONS COMPLIANCE AND FINANCIAL CRIME CONTROLS.</p> <p>UNDER THE TERMS OF THE RESOLUTIONS, THE GROUP WILL PAY A TOTAL OF \$947 MILLION IN MONETARY PENALTIES TO THE U.S. AGENCIES AND £102 MILLION TO THE FCA. THE GROUP TOOK A \$900 MILLION PROVISION WHICH INCLUDED THESE MATTERS IN THE FOURTH QUARTER OF 2018 AND WILL TAKE A FURTHER AND FINAL CHARGE OF \$190 MILLION IN THE FIRST QUARTER OF 2019. THE GROUP'S DEFERRED PROSECUTION</p>



AGREEMENTS WITH THE DOJ AND DANY HAVE BEEN EXTENDED TO 9 APRIL 2021. THE RESOLUTIONS INCLUDE NO NEW COMPLIANCE MONITORSHIPS AND THE MONITORSHIPS PREVIOUSLY IMPOSED BY THE DFS AND THE DOJ WERE TERMINATED ON 31 DECEMBER 2018 AND 31 MARCH 2019, RESPECTIVELY.

Firm Statement

STANDARD CHARTERED PLC (THE "GROUP") ANNOUNCES THAT IT HAS RESOLVED THE PREVIOUSLY DISCLOSED INVESTIGATIONS BY THE U.S. DEPARTMENT OF JUSTICE ("DOJ"), THE OFFICE OF THE DISTRICT ATTORNEY FOR NEW YORK COUNTY ("DANY"), THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS"), THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM AND THE U.S. TREASURY'S OFFICE OF FOREIGN ASSETS CONTROL (TOGETHER, THE "U.S. AGENCIES") AND THE U.K. FINANCIAL CONDUCT AUTHORITY ("FCA") INTO ITS HISTORICAL SANCTIONS COMPLIANCE AND FINANCIAL CRIME CONTROLS.

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End of Report



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