

RR Compliance Associates are a trading style of R&R Compliance Consultants Ltd, a limited company registered in England and Wales (company number 12070286).

Our registered office is 51 Lime Street, London, EC3M 7DQ. VAT number 326 1938 96.



#### REGULATORY UPDATE.













## **REGUALTORY UPDATES**

**Need Help? Speak to Our Experts!** 

Book a free consultation and get tailored compliance solutions to navigate FCA, ICO or EEA related regulations with ease.

**Book a Free Consultation** 

Download Our Free Desk Aids

We have issued a number of free desk-aid to assist you with understanding, selfassessment and implementation.

Stay ahead of regulatory changes with our regulatory updates, expert insights, and industry

Download the latest free desk-aid today to evidence compliance

best practices – just read the update below and share with colleagues.

RegZone.io - innovative AML Tool

Stay compliant with automated, real-time checks against global sanctions lists and politically exposed persons (PEPs).

Accurate & fast AML screening

Reduce costs without compromising compliance

User-friendly interface & seamless integration

RR Compliance Associates are a trading style of R&R Compliance Consultants Ltd, a limited company registered in England and Wales (company number 12070286). Our registered office is 51 Lime Street, London, EC3M 7DQ. VAT number 326 1938 96.



## Regulatory Updates - FCA (General).









# SFO Charges United Insurance Brokers Limited Over Alleged Ecuador Bribery Scheme

Update

Applies to: All firms

## Summary Action for firms

#### **Summary of Allegations**

The UK's Serious Fraud Office has charged Lloyd's broker United Insurance Brokers Limited with *failing to prevent bribery*, a corporate offence under the UK Bribery Act 2010. The allegations relate to bribes paid to Ecuadorean officials between 2013 and 2016 through US-based intermediaries.

UIB is accused of facilitating \$3 million in bribes (from a \$6.2 million commission) to win \$38 million in reinsurance contracts for Ecuador's state-owned insurers. The contracts related to covering risks for public sector entities, such as state-run water and electricity providers.

#### **Key Developments**

UIB representatives are scheduled to appear before Westminster Magistrates' Court on 7 May 2025.

No individual employees or officers (past or present) of UIB have been charged. The company has stated that the charges stem from the alleged conduct of third parties and plans to review the SFO's decision.

#### **Context and Industry Implications**

The case is part of the SFO's wider crackdown on international corruption, including a newly formed anti-bribery task force with French and Swiss authorities.

UIB follows Tysers and HW Wood, which settled related bribery allegations with the US Department of Justice in recent years.

The case highlights heightened regulatory expectations around anti-bribery controls and corporate liability, even for historical conduct and third-party actions.

#### **Action to Take:**

- This reinforces the critical importance of adequate procedures under the Bribery Act's "failure to prevent" offence.
- Firms should revisit and strengthen their compliance frameworks, particularly in relation to high-risk jurisdictions, intermediaries, and legacy business lines.
- Proactive self-reporting and internal investigations remain essential in mitigating enforcement risks.
- Review the site here.



## Regulatory Updates – FCA (General).











### Working together to deliver our enforcement priorities

Applies to: All firms

## Update Summary Action for firms

On April 11, 2025, Therese Chambers, the FCA's Joint Executive Director of Enforcement and Market Oversight, delivered a speech at NYU's Program on Corporate Compliance and Enforcement Spring Conference, outlining the FCA's enforcement priorities for the next five years. Key Enforcement Priorities (2025–2030)

#### **Combating Financial Crime**

The FCA aims to keep illicit funds out of the UK financial system by enhancing anti-money laundering (AML) controls. Notable actions include prosecuting NatWest and fining Santander for AML failures. Firms are expected to implement robust AML systems and controls to detect and prevent financial crime.

#### **Addressing Fraud in Regulated Firms**

The FCA is focusing on swift action against fraud, emphasizing the importance of timely and visible enforcement to deter misconduct. The agency is prioritising redress for victims and holding firms accountable for facilitating fraudulent activities.

#### **Ensuring Market Integrity**

Efforts are being intensified to detect and prevent insider trading and market manipulation. Firms are urged to maintain high standards of transaction reporting and to be vigilant in detecting signs of criminality.

#### **Regulating the Crypto Sector**

The FCA is working towards developing a safe and competitive crypto regime in the UK.

Actions have been taken against firms failing to meet AML standards, including enforcement against a Coinbase entity for onboarding high-risk customers despite restrictions.

#### **Strategic Shifts in Enforcement**

**Accelerated Investigations**: The FCA has reduced the average duration of investigations from 42 months to as low as 16 months, aiming for more timely enforcement actions.

**International Collaboration**: Emphasising the importance of global cooperation, the FCA highlighted joint efforts in cases like the Mozambique "tuna bonds" scandal, resulting in significant sanctions.

**Individual Accountability**: The FCA is focusing on holding senior individuals accountable, exemplified by the prohibition of former Barclays CEO Jes Staley from holding senior roles in UK financial services due to misleading the FCA about his relationship with Jeffrey Epstein.

#### **Action to Take:**

1. Read the publication here.



Update

## Regulatory Updates – FCA (General).









## FCA Board Minutes – 27

Applies to: All firms

February 2025

Summary **Action for firms** 

The Financial Conduct Authority (FCA) Board convened on 27 February 2025 to discuss various regulatory matters, including significant developments impacting the insurance sector.

#### **Consumer Duty Implementation:**

The FCA emphasised its commitment to embedding the Consumer Duty rules across the insurance industry, aiming to ensure firms prioritise consumer needs. The regulator plans to assess firms' adherence to these standards and will share insights on both exemplary and subpar practices.

#### **Operational Resilience and Third-Party Dependencies:**

Addressing the risks associated with reliance on critical third parties, the FCA highlighted the necessity for robust operational resilience.

#### **Stress Testing Initiatives:**

The Prudential Regulation Authority (PRA) outlined plans for the 2025 Life Insurance Stress Test (LIST), aiming to evaluate the sector's resilience to severe scenarios. The exercise seeks to assess both sector-wide and individual firm resilience, with results to be published in Q1 2025. Additionally, the PRA announced the Dynamic General Insurance Stress Test (DyGIST) for 2025, designed to assess insurers' solvency and liquidity under adverse conditions.

#### **Regulation of the Commercial Insurance Market:**

The FCA is consulting on rules and guidance to balance consumer protection with competitiveness in the commercial insurance market, including the London market. The consultation paper is scheduled for release in Q1 2025.

#### **Pure Protection Market Study:**

The FCA plans to launch a market study into the distribution of pure protection insurance products, addressing concerns about competition and consumer outcomes in this segment. The study is expected to commence in early 2025.

#### **Action to Take:**

Read the full publication here.



RR Compliance Associates are a trading style of R&R Compliance Consultants Ltd, a limited company registered in England and Wales (company number 12070286). Our registered office is 51 Lime Street, London, EC3M 7DQ. VAT number 326 1938 96.

