

**FINAL NOTICE ISSUED UNDER SECTION 251
OF THE FINANCIAL SERVICES AND MARKETS REGULATIONS 2015**

To: UHY James Chartered Accountants
DD-14-122-044, 14th floor, WeWork Hub 71
Al Khatem Tower
Abu Dhabi Global Market Square
Al Maryah Island
Abu Dhabi
United Arab Emirates

Date: 26 August 2025

1. DECISION

- 1.1. For the reasons given in this Final Notice (the “**Notice**”), the Financial Services Regulatory Authority (the “**Regulator**”) has decided to impose on UHY James Chartered Accountants (“**UHY James**”) a financial penalty of USD 20,400 under section 232 of the *Financial Services and Markets Regulations 2015* (the “**Regulations**”).
- 1.2. UHY James agreed to settle this matter at an early stage of the Regulator’s enquiry and action. The Regulator has therefore exercised its discretion to apply a 20% discount to the financial penalty under the Regulator’s policies for early settlement. Were it not for this discount, the Regulator would have imposed a financial penalty of USD 25,500 on UHY James.
- 1.3. The Regulator acknowledges that:
- a. UHY James and its senior management have cooperated fully with the Regulator’s enquiry and action;
 - b. UHY James has taken substantial steps to remediate the issues and deficiencies referenced in this Notice and to otherwise strengthen its systems and controls relevant to anti-money laundering (“**AML**”) compliance; and
 - c. The issues and deficiencies referred to in this Notice only relate to UHY James based in the ADGM, and no other entities in the UHY Group.

2. DEFINED TERMS

- 2.1. Defined terms are identified in the Notice in parentheses, using the capitalisation of the initial letter of a word or of each word in a phrase, and are either defined in a Rulebook, Glossary, or in the body of this Notice at the first instance the term is used. Unless the context otherwise requires, where capitalisation of the initial word is not used, an expression has its natural meaning.

FINANCIAL SERVICES REGULATORY AUTHORITY
سلطة تنظيم الخدمات المالية

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3. SUMMARY OF REASONS FOR THE DECISION

- 3.1. The Regulator has decided to take the action set out in this Notice because it considers that, during the period from around 1 February 2022 to 14 February 2024 (the “**Relevant Period**”), UHY James failed to:
- a. implement adequate AML policies and procedures (“**Policies and Procedures**”) in compliance with the Regulators Anti-Money Laundering and Sanctions Rules and Guidance Rules (“**AML Rules**”) and Federal AML Legislation;
 - b. implement and maintain effective systems and controls to effectively screen its customers to enable suspicious Persons and Transactions to be detected and reported;
 - c. take appropriate steps to conduct a business risk assessment (“**BRA**”) to identify and assess the Targeted Financial Sanctions (“**TFS**”) risks to which its business is exposed;
 - d. adequately undertake customer risk assessments (“**CRA**”) for each of its customers prior to establishing a business relationship with the customer, as well as on a periodic basis; and
 - e. adequately perform customer due diligence (“**CDD**”) (and where required enhanced customer due diligence (“**EDD**”)) on each of its customers prior to establishing a business relationship with the customer, as well as on an ongoing basis.
- 3.2. In doing so UHY James contravened a number of specific AML requirements as set out in this Notice.

4. FACTS AND MATTERS RELIED ON

Background

- 4.1. On 18 February 2020, UHY James was incorporated and registered with the ADGM Registration Authority as a branch of a foreign company. UHY James holds a commercial licence to carry on non-financial business activity of “Auditing”. Since 16 February 2022 UHY James has been registered as an ADGM Registered Auditor.
- 4.2. By carrying on the business of a Registered Auditor, UHY James is classified as a Designated Non-Financial Business or Profession (“**DNFBP**”) as defined in the Regulations. As a Registered Auditor, the Regulator would expect UHY James to be fully aware of the obligations applicable to it as a DNFBP, including the AML Rules.

Relevant Facts

- 4.3. Over the period from 26 January 2024 to 23 February 2024, the Regulator conducted a review (the “**Review**”) of UHY James’ activities and operations, audit quality, and its compliance with the AML Rules. The Review involved a detailed review of UHY James’ policies and procedures, and included discussions with senior management and staff, and detailed review of a sample of customer files.

- 4.4. On 14 February 2024, the Regulator conducted an onsite review of UHY James' activities and operations, which focused on assessing its compliance with audit and AML controls.
- 4.5. As part of the Review, the Regulator conducted a detailed review of seven (7), (referred to as "**Customers A to G**" respectively) of UHY James' twenty-eight (28) customer files (representing approximately 25% of its customers).
- 4.6. On 26 February 2024, the Regulator and UHY JAMES held a meeting at which the Regulator's preliminary findings were discussed. On the same day, the Regulator provided their Principal Findings Report ("**the Report**") to UHY James confirming its findings. The Report sets out the findings from the Review, including but not limited to, contraventions of AML systems and controls, CDD, and EDD requirements of the AML Rules and Federal AML Legislation.
- 4.7. On 11 March 2024, the UHY James provided the Regulator with its response to the findings and UHY James' planned actions to remediate the issues and deficiencies identified during the Review ("**the Response**").

Failure to establish and maintain effective AML policies, procedures, systems and controls

- 4.8. AML Rule 4.1.1(1) states that a Relevant Person must establish and maintain effective AML policies, procedures, systems and controls to prevent opportunities for money laundering, in relation to the Relevant Person and its activities.
- 4.9. AML Rule 4.1.1(2) requires that a Relevant Person's AML policies, procedures, systems and controls must:
 - 1. ensure compliance with Federal AML Legislation (AML Rule 4.1.1(2)(a)); and
 - 2. ensure compliance with the Relevant Person's obligations under AML (AML Rule 4.1.1(2)(d)).
- 4.10. The Review found that UHY James' policies and procedures were not fully compliant with the requirements of the AML Rules. In particular:
 - a. UHY James' '*Anti-Money Laundering, Counter Financing of Terrorism and Sanctions Compliance Manual*' (Version 4) ("*Policies and Procedures*"), at '*Section K-Establishing a business relationship before verification*' was inconsistent with the requirements under AML Rule 8.2.1(5) which, since 27 September 2022, requires verification of the identification of a customer and its Beneficial Owners to be completed within 20 instead of 30 business days of effecting a transaction.
 - b. Furthermore, the AML Policy maintained by UHY James did not adequately consider all applicable AML Rules and Federal AML Legislation requirements as the latest Financial Action Task Force ("**FATF**") list of jurisdictions under increased monitoring to identify high risk countries, issued on 27 October 2023, was not included in its Policies and Procedures Manual.

- 4.11. UHY James acknowledged the findings of the Review and revised its AML policies and procedures in March 2024 to address the inadequacies summarised above. In February 2025, UHY James implemented a further revision of its AML policies and procedures:
- 4.12. Accordingly, the Regulator considers that UHY James has contravened AML Rules 4.1.1(1), 4.1.1(2)(a), 4.1.1(2)(d), and 11.2.1.

Inadequate screening systems and controls

- 4.13. AML Rule 4.1.1(1) requires UHY James to establish and maintain effective AML policies, procedures, systems and controls to prevent opportunities for money laundering, in relation to the Relevant Person and its activities.
- 4.14. AML Rule 4.1.1(2) requires, among other things, for UHY James' to ensure that its AML policies, procedures, systems and controls are able to detect and report suspicious Persons and Transactions.
- 4.15. Approximately three (3) months prior to the Review, UHY James migrated and changed its screening software. The Review of the seven (7) customer files identified that on multiple occasions UHY James identified positive matches when screening its customers which should have been resolved. However, the Review identified that UHY James had not done so and there remained numerous unresolved screening matches. In particular:
- a. There were 397 unresolved screening matches for four (4) customers (customers A, E, F and G); and
 - b. For customer C, the CRA failed to identify any adverse media even though several media releases were published which highlighted allegations of potential non-UAE sanctions evasions against customer C.
- 4.16. Further, the Review found that when a positive match was identified by the firm's screening software, this was disregarded by the case officer / Money Laundering Reporting Officer ("MLRO") without providing adequate justifications to explain the decision.
- 4.17. In its Response, the Firm did not dispute the findings of the Review, stating:
- "All files are currently under review and all unresolved screening shall be resolved. The reports shall be shared by 29th March 2024". [bold for emphasis].***
- 4.18. Accordingly, the Regulator considers that UHY James has contravened AML Rule 4.1.1(1) and 4.1.1(2).

Failure to conduct a TFS assessment

- 4.19. AML Rule 6.1.1 requires UHY James as a Relevant Person for the purposes of AML to:
- a. take appropriate steps to identify and assess money laundering risks to which its business is exposed, taking into consideration the nature, size and complexity of its activities, taking into account money laundering risks which include the risk of terrorist financing, proliferation financing, the financing of unlawful organisations and sanctions non-compliance including non-compliance with TFS.

- b. when identifying and assessing the risks in (a), take into account, to the extent relevant, any vulnerabilities relating to:
 - i. its type of customers and their activities;
 - ii. the countries or geographic areas in which it does business;
 - iii. its products, services and activity profiles;
 - iv. its distribution channels and business partners;
 - v. the complexity and volume of its Transactions;
 - vi. the development of new products and business practices including new delivery mechanisms, channels and partners; and
 - vii. the use of new or developing technologies for both new and pre-existing products and services; and
 - c. take appropriate measures to ensure that any risk identified as part of the assessment in is taken into account in its day to day operations and is mitigated, including in relation to:
 - i. the development of new products;
 - ii. the taking on of new customers; and
 - iii. changes to its business profile.
- 4.20. The Review found that whilst UHY James had conducted a BRA, its BRA was inadequate in that it failed to identify and assess the risks to which it was exposed in relation to TFS compliance, as it was required to do under both the AML Rules and Federal AML Legislation.
- 4.21. As a Relevant Person, UHY James should, as part of its BRA, undertake a TFS risk assessment in order to identify, understand, assess and mitigate those risks. This should have included conducting a proliferation financing and terrorist financing risk assessment.
- 4.22. Therefore, the Regulator considers that the BRA undertaken by UHY James was deficient, in contravention of AML Rule 6.1.1.
- 4.23. UHY James acknowledged the findings of the Review in March 2024 and undertook remediation action to address the deficiency. In March 2024, UHY James conducted and documented a TFS risk assessment. In March 2025, it revised its BRA such that it included the assessment of the money laundering, proliferation financing and terrorist financing risk to which its business was exposed.

Failure to conduct adequate Customer Risk Assessment

- 4.24. AML Rule 7.1.1 requires UHY as a Relevant Person for the purposes of AML to:
- undertake a risk-based assessment of every customer; and
 - assign the customer a risk rating proportionate to the assessed money laundering risks associated with the customer.

- 4.25. The Review identified that:

- For the seven (7) customer files reviewed, UHY James used the same, or very similar, repetitive wording to describe different types of risks associated with multiple customers. For example, the statement below was used in the Client and Service Risk sections, the Business Risk sections and also in Conclusion sections of the CRA's:

"Requested for external audit services, hence marking it as low risk"

without differentiation;

- The risk scoring methodology adopted by UHY James was highly subjective and based on the onboarding officer's own assessment as demonstrated by the 'tick box approach' and the allocation of Risk Rating between 1 and 6 for each Risk category without providing an explanation as to how these numbers were arrived at;
- UHY James merged the customer risk with the service risk factors on its CRA form for the seven (7) reviewed customers and simply stated the licensed activities of the customer in this section. The reviewed CRAs undertaken by UHY James did not demonstrate a sufficient understanding of the customers' business, or the risks that it may pose. The CRA form only records the business activities of its customers without any underlying analysis to support the risk rating assigned;
- Five (5) of the seven (7) customers were rated as low risk, however, the factors that a Relevant Person must take into account if considering a low-risk rating were not documented by the MLRO;
- For one (1) Customer, Customer D, the firm recorded on the CRA that "*Since the shareholders are foundations. No UBO is present*". As a result, UHY James failed to identify the beneficial owners of the Customer. Furthermore, it failed to identify the complexity of the corporate structure in the overall risk assessment of that Customer;
- For one (1) customer, Customer G, the CRA undertaken by UHY James when the customer was first onboarded identified one of the beneficiaries of the customer as a Politically Exposed Person ("**PEP**"). However, when a CRA review was conducted in 2023 the same individual was not identified as a PEP and no explanation was provided on whether this individual's PEP status had changed; and
- For one (1) customer, customer C, rated as low risk, UHY James obtained bank statements as part of the onboarding process. These statements recorded transactions on a daily basis showing large volumes of deposits followed by large

volumes of withdrawals, i.e. potentially indicating high-risk transactions. However, there is no record on the customer file to demonstrate UHY James's understanding of these transactions and to assess the impact on the overall risk rating of this Customer. Therefore, the Customers risk rating was inappropriately assessed.

- 4.26. In the absence of an adequate CRA, UHY James failed to identify the money laundering risks associated with each customer and its beneficial owners. The performance of CRA is a fundamental requirement in that, it dictates the standard of customer due diligence required to be undertaken prior to the establishment of a business relationship with each Customer.
- 4.27. Without having undertaken an appropriately documented CRA for each of these Customer, UHY James was not in a position to understand the risks of money laundering and financial crime or be in a position to adequately mitigate and address those risks through appropriate CDD and ongoing CDD.
- 4.28. Therefore, the Regulator considers this a contravention of AML Rule 7.1.1(1)(a), 7.1.1(1)(b), 7.1.1(2)(c), 7.1.1(3)(a), 7.1.1(3)(b), 7.1.1(3)(c), 7.1.1(3)(e), 7.1.2(1)(a) and 7.1.3.
- 4.29. UHY James acknowledged the findings of the Review in March 2024 and undertook steps to remediate the identified deficiencies in relation to its CRA practices. In March 2024, UHY reviewed its CRA processes and implemented revised CRA procedures under which it applied and documented its risk assessments of customers in more detail and objectively applied AML risk ratings to each customer.

Failure to conduct adequate Customer Due Diligence on its customers

Failure to Verify Customers' Identity

- 4.30. As a Relevant Person, UHY James is required under AML Rule 8.1.1(2) to undertake CDD (and if applicable EDD) of its customers.
- 4.31. Under AML Rule 8.2.1(2), a DNFBP must fulfil its CDD (and where applicable EDD) obligations before it prepares for or carries out a Transaction or provision of a service to the customer.
- 4.32. AML Rule 8.3.2 requires UHY James to identify and verify its customers' identity as part of the CDD it performed on its customers.
- 4.33. UHY James was required to verify its customers' identity, in the absence of a first-hand inspection of an original identification document, by obtaining certified true copies of its customers' original identification documents.
- 4.34. As part of the Review, the Regulator conducted a detailed review of UHY James' files for seven (7) of its twenty-eight (28) customers (representing approximately 25 per cent of its customers). The Regulator identified that UHY James had failed to:
- a. produce certified true copies of identification documents in relation to all seven (7) of the customer files reviewed; and
 - b. include evidence on file that demonstrated that the identification documents of all seven (7) customers had been sighted by UHY James.

- 4.35. UHY James acknowledged the findings of the Review in March 2024 and undertook steps to remediate the identified deficiencies in relation to its verification of customers by obtaining certified true copies of identification documents or by referencing these documents as originally sighted with an employee signature.
- 4.36. As a result, the Regulator found from the Review that UHY James had failed to adequately verify its customers identity, and accordingly, the Regulator considers that UHY James has contravened AML Rule 8.3.2.

Failure to Identify and Verify Source of Funds ("SOF") and Source of Wealth ("SOW")

- 4.37. AML Rule 8.4.1 requires UHY James to undertake EDD, in addition to CDD under AML Rule 8.3.1, for all customers it had:
- a. assessed as being high-risk for money laundering; or
 - b. identified as being a PEP (or its beneficial owner(s) as being a PEP).
- 4.38. For UHY James to fulfil its EDD obligations for each of its customers identified as being a PEP, it was required to, among other things, identify and verify the SOF and SOW of the customer and, where applicable, all beneficial owners.
- 4.39. For two (2) customers that UHY James had rated as low risk and medium risk respectively, UHY James failed to undertake EDD including the identification and verification of the SOF and SOW when it had identified these customers as PEPs;
- 4.40. UHY James acknowledged the findings of the Review in March 2024 and undertook steps to remediate the identified deficiencies in relation to EDD. In March 2025, it revised its CRA and included a separate PEP assessment form to ensure high risk customers were identified and EDD was performed.
- 4.41. Accordingly, the Regulator considers that UHY James had contravened AML Rule 8.4.1(c).

Failure to Identify the Beneficial Owners of a customer and undertake adequate CDD

- 4.42. As a Relevant Person, UHY James is required under AML Rule 8.3.1 (1) (b) when undertaking CDD, to identify all Beneficial Owners and take reasonable measures to verify the identity of the Beneficial Owners such that the Relevant Person is satisfied that it knows who the Beneficial Owners are.
- 4.43. As detailed in paragraph 4.25(e) above, UHY James did not identify the Beneficial Owners of Customer D and therefore did not undertake adequate CDD to verify the identity of the Beneficial Owners.
- 4.44. Accordingly, the Regulator considers that UHY James had contravened AML Rule 8.3.1(1)(b).

Failure to conduct periodic reviews of CDD information

- 4.45. As a Relevant Person, UHY James is required under AML Rule 8.6.1 when undertaking ongoing CDD, to periodically review the adequacy of the CDD information it holds on its

customers and Beneficial Owners to ensure that the information is kept up to date, particularly for customers with a high-risk rating.

- 4.46. For customer F, UHY James failed to identify a change in beneficial ownership of the customer that occurred in July 2023 that resulted in relevant information being added to the ADGM Public Register. UHY James audited the accounts of Customer F for 2021 and 2022. The 2022 accounts for Customer F were signed in September 2023 after the relevant change in beneficial ownership had occurred. As a result, no due diligence was performed on the new shareholders and there was no evidence on file that an updated CRA was undertaken in accordance with AML Rule 7.1.1(2)(b).
- 4.47. Accordingly, the Regulator considers that UHY James had contravened AML Rules 7.1.1(2)(b) and 8.6.1.

Remediation undertaken by UHY James

- 4.48. During the period following the Review and before the commencement of the Regulator's action in this matter, the Regulator recognises that UHY has undertaken remediation actions and updated its AML policies and procedures and systems and controls, including:
- a. Revising its AML policies and procedures in March 2024 to address the inadequacies summarised in paragraph 4.10;
 - b. Implementing a further revision of its AML policies and procedures in February 2025 to address the inadequacies in its previous AML framework;
 - c. Conducting and documenting a TFS risk assessment in March 2024 to address the inadequacies summarised in paragraphs 4.20 to 4.21 above.
 - d. Revising its CRA form and CRA processes to address the inadequacies summarised in paragraphs 4.25 to 4.27 above;
 - e. Revising its client verification process address the inadequacies summarised in paragraph 4.34 above; and
 - f. Introducing a separate PEP assessment form in its CRA process to address the inadequacies summarised in paragraph 4.39 above.
- 4.49. The Regulator understands further that since becoming aware of the Regulator's concerns identified by the review, UHY James has taken steps to address the various issues that had been identified.
- 4.50. The Regulator acknowledges UHY James' full co-operation and understands that it has taken measures to remediate each of the issues and deficiencies to date set out in this Final Notice.

5. CONTRAVENTIONS

5.1. Given the facts and matters set out above, the Regulator has found that during the Relevant Period, UHY James has contravened the following:

- a. AML Rule 4.1.1(1) and 4.1.1(2)(a) and 4.1.1(2)(d) by failing to
 - i. establish and maintain effective AML Policies and Procedures in compliance with the AML Rules and Federal AML Legislation; and
 - ii. enable suspicious Persons and Transactions to be detected and reported.
- b. AML Rule 6.1.1 by failing to include a TFS assessment as part its BRA;
- c. AML Rules 7.1.1(1)(a), 7.1.1(1)(b), 7.1.1(2)(c), 7.1.1(3)(b), 7.1.1(3)(c), 7.1.1(3)(e), 7.1.2(1)(a) and 7.1.3 by failing to adequately undertake a risk-based assessment of the customer prior to establishing a business relationship with the customer;
- d. AML Rule 7.1.1(2)(b) by failing to undertake a periodically review of its customer to ensure that the risk rating assigned to its customer remained appropriate after its customer had undergone a CIC;
- e. AML Rule 8.3.1(1)(b) by failing to identify and verify the identity of the Beneficial Owners of one (1) of its customers;
- f. AML Rule 8.3.2 by failing to verify its customers identify;
- g. AML Rule 8.4.1(c) by failing to verify the SOF and SOW of the customers it had identified as PEPs; and
- h. AML Rule 8.6.1 by failing to periodically review the adequacy of the CDD information it holds on its customers.
- i. AML Rule 11.2.1(1) by failing to establish and maintain systems and controls to ensure that on an ongoing basis it is properly informed as to, and takes reasonable measures to comply with, any findings, recommendations, guidance, directives, resolutions, Sanctions, notices or other conclusions issued by FATF and failing to ensure that UHY James's systems and controls enable it to comply with the Article 21 of Cabinet Decision No 74 of 2020.

6. SANCTION

6.1. In deciding to impose a financial penalty on UHY James, the Regulator has taken into account the factors and considerations set out in sections 8.2 to 8.4 of the Regulator's Guidance & Policies Manual ("GPM").

Decision to impose a financial penalty

- 6.2. With reference to section 8.2 of GPM, the Regulator considers the following factors to be of particular relevance in deciding to impose the financial penalty on UHY James:
- a. *8.2.1(a) - the Regulator's objectives under section 1(3) of the Regulations to:*
 - i. foster and maintain confidence in the ADGM;
 - ii. prevent, detect and restrain conduct that causes or may cause damage to the reputation of the ADGM through appropriate means including the imposition of sanctions; and
 - iii. promote public understanding of the regulation of the ADGM.
 - b. *8.2.1(b) - the deterrent effect of the penalty and the importance of deterring other DNFBPs from committing similar contraventions.*
 - c. *8.2.1(c) – In terms of nature, seriousness, duration and impact of the contravention:*
 - i. the contraventions reveal systemic weakness of the systems and controls in relation to UHY James' CRA and CDD and where applicable, EDD practices; and
 - ii. UHY James' failings exposed its business, and the ADGM to increased risk of money laundering and financial crime over the Relevant Period.

Determination of the level of financial penalty

- 6.3. With reference to section 8.4 of GPM, the Regulator has taken into account the factors and considerations set out in the five-step framework in section 8.5 of GPM in determining the level of the financial penalty it has decided to impose:

Step 1: Disgorgement

- 6.4. This step is not considered to be relevant, as the Regulator has not seen UHY James deriving any financial benefit from the contraventions.

Step 2: The seriousness of the contraventions

- 6.5. The Regulator considers UHY James' conduct to be sufficiently serious to warrant the financial penalty imposed in this Notice because:
- a. The contraventions revealed material deficiencies in UHY James's AML policies and procedures;
 - b. the contraventions are indicative of systemic weaknesses in UHY James' customer onboarding practices; and
 - c. UHY James' failings exposed its business and the ADGM to an increased risk of money laundering and financial crime over the Relevant Period.

- 6.6. Taking the above factors into account, the Regulator considers that a financial penalty of USD 30,000 appropriately reflects the nature of the contraventions.

Step 3: Mitigating and aggravating factors

- 6.7. The Regulator considers that the following factors have a mitigating effect on the contraventions:
- a. UHY James does not have any previous history of non-compliance with the AML Rules; and
 - b. UHY James has been co-operative with the Regulator and has taken substantial steps to remediate any non-compliance with the AML Rules both during and after the Review

- 6.8. The Regulator considers that there are no aggravating factors on the contraventions.
- 6.9. Having taken the above factors into account, , in particular the factor noted in paragraph 6.7b, the Regulator has applied a 15% reduction to the level of the financial penalty which it would have otherwise imposed.
- 6.10. Accordingly, the figure after Step 3 is USD 25,500.

Step 4: Adjustment for deterrence

- 6.11. Section 8.5.9 of GPM provides that if the Regulator considers the level of the financial penalty which it has arrived at after Step 3 is insufficient to deter the firm that committed the contravention, or others, from committing further or similar contraventions, then the Regulator may increase the financial penalty. Section 8.5.9 of GPM sets out the circumstances in which the Regulator may do this.
- 6.12. In this instance, the Regulator considers that the figure arrived at after Step 3 is sufficient for the purposes of deterring UHY James and others from committing further or similar contraventions. Accordingly, the Regulator does not consider it necessary to adjust the amount of the fine arrived at after Step 3 for the purposes of deterrence.
- 6.13. Accordingly, the figure after Step 4 is USD 25,500.

Step 5: Adjustment for cooperation/early settlement

- 6.14. Where the Regulator and the firm on which the financial penalty is to be imposed come to an agreement on the amount of the financial penalty, section 8.5.10 of GPM provides that the amount of the financial penalty which might have otherwise been payable will be reduced to reflect the stage at which the agreement is reached.
- 6.15. The Regulator and UHY James have reached an agreement on the relevant facts and matters relied on, the regulatory action to be taken and the financial penalty to be imposed. Having regard to the stage at which this agreement has been reached and in recognition of the benefit of this agreement, the Regulator has applied a 20% discount to the level of the financial penalty which it would have otherwise imposed.
- 6.16. Accordingly, the figure after step 5 is USD 20,400.

The level of the financial penalty

- 6.17. Given the facts and matters set out above and all the circumstances, the Regulator has determined that it is proportionate and appropriate to impose on UHY James a financial penalty of USD 20,400 for the alleged contraventions.

7. PROCEDURAL MATTERS

Settlement

- 7.1. The Regulator and UHY James have reached an agreement on the relevant facts and matters relied on, the regulatory action to be taken and the financial penalty to be imposed. In agreeing to the action set out in this Notice and deciding to settle this matter, UHY James has agreed not to refer this matter to the Appeals Panel.

Payment of financial penalty

- 7.2. The financial penalty imposed by this Notice is to be paid in full by UHY James on or before **30 days from the date of this Notice**, unless varied or otherwise agreed by the Regulator.
- 7.3. Payment of the financial penalty is to be made by electronic funds transfer according to the instructions set out in the table below:

Account Name	
Account Number	
IBAN Number	
Account Type	
Bank Name	
Swift Code	
Reference	

- 7.4. In the event that any part of the financial penalty remains outstanding on the date by which it must be paid, then the Regulator may recover the outstanding amount of the financial penalty as a debt owed by UHY James and due to the Regulator.

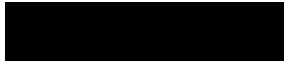
Publicity

- 7.5. As this Notice has now been given to UHY James, the Regulator may, pursuant to section 252(3) of the Regulations, publish the details about the matter at its discretion.
- 7.6. Pursuant to section 252(4) of the Regulations, UHY James is not permitted to publish this Notice or any details concerning it unless the Regulator has published the Notice or those details in accordance with section 252(3).

7.7. The Regulator will publish on its website:

- a. this Notice; and
- b. subject to section 252(5) of the Regulations, a press release in a form and manner the Regulator considers appropriate.

Signed:



Lawrence Paramasivam

Senior Executive Director - Policy and Legal
Financial Services Regulatory Authority