



## Imposition of Monetary Penalty – Travelex (UK) Ltd

### Penalty imposed on: Travelex (UK) Ltd

1. On Monday, 8 March 2019 the Office of Financial Sanctions Implementation (OFSI), part of HM Treasury, issued a monetary penalty in accordance with s146 of the Policing and Crime Act 2017 against Travelex (UK) Ltd for a contravention of the EU Egypt financial sanctions regime. No discount was applied for voluntary disclosure and the monetary penalty was set at £10,000. This breach is linked to a monetary penalty issued against Raphaels Bank on 21 January 2019.
2. The value of the transaction was £204.00. Travelex (UK) Ltd dealt with funds belonging to a person designated under the above regime.
3. OFSI imposed the monetary penalty because it was satisfied, on the balance of probabilities, that Travelex (UK) Ltd breached a prohibition imposed by regulation 3 of the Egypt (Asset-Freezing) Regulations 2011 (S.I. 2011/887), and knew, or had reasonable cause to suspect, that they were in breach of the prohibition.
4. Travelex had direct, in-person, contact with a designated person (DP), in the UK, and dealt with funds belonging to that person despite having access to their passport, which clearly identified the individual by both name, date of birth and nationality.
5. Travelex were aware of financial sanctions risks and their obligations, and despite this they dealt with funds belonging to a DP. The regime under which the individual was designated is one where sanctions are applied because of the misappropriation of Egyptian State funds. Travelex's actions allowed the individual to utilise funds that should have been frozen. No matter the value of the transaction, the breach directly contravened the policy intention of the asset freeze.

## Note on Compliance

6. Information on which persons are designated under each financial sanctions regime is published by OFSI and is available as a consolidated list on our website. You can also sign up for our e-mail alerts so you are notified each time the consolidated list is updated.
7. Companies should take care to make sure they carry out appropriate financial sanctions screening or checks, and act on the results in the correct way. Where the financial sanction is an asset freeze, it is generally prohibited to:
  - Deal with the frozen funds or economic resources, belonging to or owned, held or controlled by a designated person
  - Make funds or economic resources available, directly or indirectly, to, or for the benefit of, a designated person
  - Engage in actions that, directly or indirectly, circumvent the financial sanctions prohibitions

The funds and economic resources are to be frozen immediately by the person in possession or control of them.

8. If you know or have reasonable cause to suspect that you are in possession or control of, or are otherwise dealing with, the funds or economic resources of a designated person you must:
  - Freeze them
  - Not deal with them or make them available to, or for the benefit of, the designated person, unless there is an exemption in the legislation that you can rely on or you have a licence from OFSI
  - Inform OFSI