

11 December 2025

### **Member severely reprimanded\***

On 11 December 2025, the Consent Orders Chair of the Association of Chartered Certified Accountants (ACCA) found proved the following allegations against a member, Mr Malcolm Roe, of Blackburn, United Kingdom:

### **Allegations**

Mr Malcolm Roe, an ACCA Fellow:

1. Between 26 June 2017 and 4 April 2025, failed on behalf of Firm A to comply with or demonstrate compliance with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 ("the MLRs 2017"), namely:
  - (a) Regulation 18 - Risk assessment by relevant persons: Firm-wide risk assessment
  - (b) Regulation 19 - Policies, controls and procedures: AML policy and procedures
  - (c) Regulation 21 – Training
  - (d) Regulations 27 - 32 - Customer due diligence: CDD
  - (e) Regulation 28 - Customer due diligence measures: Ongoing monitoring
  - (f) Regulation 33 - Obligation to apply enhanced customer due diligence
  - (g) Regulations 33 - 36 - Enhanced customer due diligence: Identifying client risk, EDD
  - (h) Regulation 40 - Record keeping
2. On or about 26 November 2021 and 9 April 2024, submitted or caused to be submitted to ACCA AML Risk Assessment Questionnaires ("AML RAQs") on behalf of Firm A which inaccurately stated that he had conducted and/or documented a Firm-wide Risk Assessment ("FWRA") and AML Policies and Procedures ("AML P&Ps") for Firm A when in fact he had not conducted and documented a FWRA and AML P&Ps for Firm A at those times.

3. By reason of his conduct set out at Allegation 1 above, Mr Roe failed to comply with Subsection 115 of ACCA's Code of Ethics and Conduct (the Fundamental Principle of Professional Behaviour) and Section B2 of ACCA's Code of Ethics and Conduct (Anti-money laundering).
4. Mr Roe's conduct in respect of Allegation 2 was reckless in that he declared that he had conducted and documented a FWRA and AML P&Ps in place at Firm A without proper regard as to whether this was true.
5. By reason of his conduct set out at Allegations 1 - 4 above, Mr Roe is guilty of misconduct pursuant to bye-law 8(a)(i).

The Consent Orders Chair ordered that Mr Roe be severely reprimanded and pay costs to ACCA in the sum of £1,630.00 and a fine of £5,000.00.

ACCA's regulations require ACCA to publish the Committee's finding and orders by way of a press release, as soon as practicable.

**- ends -**

**For media enquiries, contact:**

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We are ACCA (the Association of Chartered Certified Accountants), a globally recognised professional accountancy body providing qualifications and advancing standards in accountancy worldwide.

Founded in 1904 to widen access to the accountancy profession, we've long championed inclusion and today proudly support a diverse community of over 252,500 members and 526,000 future members in 180 countries.

Our forward-looking qualifications, continuous learning and insights are respected and valued by employers in every sector. They equip individuals with the business and finance expertise and ethical judgment to create, protect, and report the sustainable value delivered by organisations and economies.

Guided by our purpose and values, our vision is to develop the accountancy profession the world needs. Partnering with policymakers, standard setters, the donor community, educators and other accountancy bodies, we're strengthening and building a profession that drives a sustainable future for all.

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