

**APPLICATION ON PAPERS
CONSENT ORDERS COMMITTEE OF THE ASSOCIATION OF
CHARTERED CERTIFIED ACCOUNTANTS**

REASONS FOR DECISION

In the matter of: Mr Khalil Ur Rehman Malik

Heard on: Friday, 27 February 2026

Chair: Ms Colette Lang

Legal adviser: Mr Alastair McFarlane

Outcome: Consent Order approved

DOCUMENTS BEFORE THE COMMITTEE

1. The Committee received a Bundle of papers including a signed Consent Order numbered pages 1 - 309, a Detailed Costs Schedule of one page and a Simple Costs Schedule of one page and a Consent Order referral form of one page.

CONSENT ORDER

The Association of Chartered Certified Accountants (ACCA) and Mr Khalil Ur Rehman Malik (the Parties), agree as follows:

1. Mr Khalil Ur Rehman Malik admits the following:

Mr Khalil Ur Rehman Malik, an ACCA Fellow and the Money Laundering Reporting Officer (MLRO) of Firm A:

1. Between 26 June 2017 and 20 November 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 2019 ("the MLRs 2017"), namely:
 - (a) Regulation 18 - Risk assessment by relevant persons: Firm-wide risk assessment
 - (b) Regulation 24 - Training
2. By reason of his conduct set out at Allegation 1 above, Mr Malik failed to comply with Subsection 115 of ACCA's Code of Ethics and Conduct (the Fundamental Principle of Professional Behaviour) and Section 82 of ACCA's Code of Ethics and Conduct (Anti-money laundering).
3. By reason of his conduct, Mr Malik is guilty of misconduct pursuant to Bye-law 8(a)(i).

Sanction

2. That Mr Khalil Ur Rehman Malik shall be severely reprimanded, shall be fined £5,000 and shall pay costs to ACCA in the sum of £1,542.50.

BACKGROUND

2. Mr Malik is a principal and the Money Laundering Reporting Officer of Firm A. Mr Malik holds a practising certificate ("PC") with ACCA.
3. As a holder of a PC from ACCA, there is a mandatory requirement for Firm A to be monitored by ACCA to assess compliance with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 ("MLRs 2017").
4. ACCA also considers Anti-Money Laundering Guidance for the Accountancy Sector ("AMLGAS"). AMLGAS is guidance based on the law and regulations as

of June 2023. It covers the prevention of money laundering and the countering of terrorist financing. It is intended to be read by anyone who provides audit, accountancy, tax advisory, insolvency, or trust and company services in the United Kingdom and has been approved and adopted by the UK accountancy AML supervisory bodies.

5. As part of ACCA's supervisory work, a desk-based monitoring review of Firm A was carried out in September 2025. It was a routine monitoring review. The purpose of the review was to monitor Firm A's compliance with the MLRs 2017.
6. During the AML compliance review, Firm A displayed poor AML controls. The following AML controls were tested and found to be non-compliant:

Firm-wide risk assessment ("FWRA")

Based on the evidence provided, Firm A did not conduct and document a FWRA until 2025. The MLRO confirmed during the review that the FWRA submitted for review was the firm's first and only documented FWRA. Therefore, Firm A was in breach of Regulation 18 of the MLRs 2017 until 2025.

Training

Firm A has not maintained a written record of the measures taken to ensure that employees are aware of AML legislation and understand how it applies to their role and are able to identify and deal with suspicious activity. This is a requirement under Regulation 24(b) of the MLRs 2017. Firm A also did not provide any AML training to its employees until 2022. It has been a legal requirement to provide regular AML training since July 2017.

Sanction

7. The appropriate sanction is severe reprimand.

CHAIR'S DECISION

8. Under Regulation 8(8) of the Complaints and Disciplinary Regulations 2014, I must determine whether, based on the evidence before it, the draft Consent

Order should be approved or rejected. I had regard to the Consent Orders Guidance.

9. I noted that under Regulation 8(12) I shall only reject the signed Consent Order if I am of the view that the admitted breaches would, more likely than not, result in exclusion from membership.
10. I agree that an investigation of an appropriate level was conducted by ACCA.
11. I note that Mr Malik has admitted all allegations including misconduct.
12. I agree that there is a case to answer and that there is a real prospect that a reasonable tribunal would find the allegations proved.
13. I have considered the seriousness of the breaches as set out and the public interest, which includes the protection of the public, the maintenance of public confidence in the profession and the declaring and upholding of proper standards of conduct and performance. I have balanced this against Mr Malik's interests and his mitigation.
14. I have noted and accept the list of aggravating and mitigating factors advanced at paragraphs 9 and 10 of the draft Consent Order Bundle. I note that Mr Malik's misconduct was not deliberate or dishonest, that he has regularised his position and there is no continuing risk to the public. Further, Mr Malik has fully cooperated with the investigation, made full admissions, shown insight and there was no evidence of money laundering being actually enabled. I consider that the behaviour is unlikely to be repeated and that the continuing risk to the public is low.
15. I have had regard to ACCA's Guidance for Disciplinary Sanctions. I am satisfied that there was early and genuine acceptance of the conduct and that the risk to the public and profession from Mr Malik continuing as a member is low.
16. For the reasons set out above, I am satisfied that the admitted breaches would be unlikely to result in exclusion from membership, and therefore there is no basis for me to reject the consent order under Regulation 8 (12). I note the proposed Consent Order and, considering all the information before me, am

satisfied that a severe reprimand coupled with a fine sufficiently reflects the seriousness of the AML failures and is an appropriate and proportionate disposal of this case.

17. I am further satisfied to award ACCA's costs in the sum of £1,542.50, which I find to be a reasonable and proportionate amount for the work undertaken.

ORDER

18. The Chair, pursuant to his powers under Regulation 8, made an Order in terms of the draft Consent Order, namely that Mr Malik be severely reprimanded and fined £5,000. In addition, Mr Malik is to pay ACCA's costs of £1,542.50.

Ms Colette Lang
Chair
27 February 2026