








AML/CFT Support

BULGARIA ADDED TO THE FATF “GREY LIST”


Jurisdictions under increased monitoring are actively working with the FATF to address strategic deficiencies in their regimes to counter money laundering, terrorist financing, and proliferation financing. When the FATF places a jurisdiction under increased monitoring, it means the country has committed to resolve swiftly the identified strategic deficiencies within agreed timeframes and is subject to increased monitoring. This list is often externally referred to as the “grey list”. In October 2023, Bulgaria made a high-level political commitment to work with the FATF and MONEYVAL to strengthen the effectiveness of its AML/CFT regime.


Bulgaria will work to implement its FATF action plan by:


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| <ul style="list-style-type: none">  Implementing its national AML/CFT Strategy through adopting a comprehensive action plan  Addressing the remaining technical compliance deficiencies  Demonstrating initial implementation of risk-based supervision for postal money operators, currency exchange providers and real estate agents and establishing market entry controls for VASPs and postal money operators  Ensuring that the beneficial ownership information held in the Register is accurate and up-to-date | <ul style="list-style-type: none">  Completing the implementation of the automated system to ensure more automated prioritization of STRs and addressing gaps in the TF and PF targeted financial sanctions (TFS) framework  Improving investigations and prosecutions of different types of money laundering in line with risks, including high-scale corruption and organised crime and ensuring that confiscation is pursued as policy objective  Ensuring the ability to conduct parallel financial investigations in all terrorism investigations and identifying the subset of NPOs most vulnerable to TF abuse and demonstrating initial implementation of risk-based monitoring to prevent abuse for TF purposes |
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CHALLENGES

Adapting to a demanding and rapidly changing regulatory environment

 Considering the continuous development of the AML and CFT legal framework, it is apparent that legislators are paying increased attention to these topics and professionals’ compliance with applicable legislation on a national and European level.

 In recent years, local legislators and regulators as well as the European Commission have continuously drafted and enforced new legislation to quickly adapt to changing circumstances and prevent local and cross-border financial crime. This increases the difficulty for professionals to remain fully compliant at all times and keep up with the evolving legal framework.

 International guidelines and recommendations, the Financial Action Task Force’s publications in particular, are decisive factors in shaping today’s AML/CFT environment. Non-compliance may not only lead to sanctions against the individual perpetrator and the company but also damage to the professional’s reputation, which can incur incalculable and existentially threatening consequences for the company.

 Professionals are obliged to ensure they comply with current and future legislation. While professionals may seize opportunities associated with digitalization, globalization, the political environment and extraordinary events, it is crucial that professionals are aware of any connected regulatory changes and remain compliant.

OPPORTUNITIES

Risk Assessment

Preparation of the methodology for a comprehensive risk assessment on a level of a company within the group.

Transaction Monitoring

Efficiency analysis of the system for on-going monitoring clients’ business activities.

Financial Sanction Screening

Assess the current situation (from both business process and technological point of view) and create a roadmap for addressing both compliance and efficiency in its related business case.

MIS, Metrics and Analytics

Design a fully automated reporting system supporting users with their daily tactical decisions and providing insights for the management.

AML/CFT Support

AML/CFT FRAMEWORK – HOW CAN WE HELP?

Strategic Offerings

Target Operating Model: We assist in the design and implementation of your AML Target Operating Model – a framework that outlines the processes, roles and responsibilities, technology and resources needed to effectively manage AML activities.

Training and awareness: Training programmes are tailored around your organization’s specific environment and are delivered by trained individuals with theoretical and practical knowledge and experience on AML/CFT matters.

Policy and process design and development: We are able to develop and implement practical and effective AML/CFT Frameworks including the drafting of policies and procedures based on the risk-based approach.

Risk Assessments

Typology Assessments: A typology assessment sits at the heart of any robust risk-based approach as it helps to identify areas of vulnerability and to develop targeted prevention and detection measures.

Business Risk Assessments: We help develop business risk assessment methodologies and reports. Our approach to business risk assessment is based on sound risk management principals and built on quantitative and qualitative risk metrics and indicators.

Risk Scoring Methodologies: We support organisations to develop risk scoring methodologies that are based on robust risk management principles and leverage quantitative and qualitative data points.

Maturity Assessments

Independent AML/CFT Audits: We support governance bodies, the internal audit function and the MLRO to independently evaluate the strength of their systems and controls; either for internal evaluation or external stakeholders.

Simulated on-site inspections: We perform mock inspections that mirror the regulators’ approach to enhance readiness whilst providing insight on key strengths and weaknesses, as well as remediation recommendations.

Health check of Regulatory Compliance: We can help identify gaps by conducting an assessment of the organization’s AML/CFT and Sanctions structure and draft an AML programme to address and reduce the gaps identified.

DELOITTE VALUE SOLUTIONS



Organisation

Centralised response team and communication, kick-off meetings and an action plan. Clear responsibilities.



Knowledge of the industry and best practices

Experience with projects for clients within the Banking & Finance industry. Knowledge of the industry, best practices, and current market trends.



Experienced professionals

Senior professionals with broad-based and relevant experiences in AML/CFT and Compliance projects. Our team combines compliance, legal, technology, and forensic knowledge.



Business Intelligence Services

BIS is a dedicated service line within the Deloitte Central Europe practice. With a dedicated BIS team in Poland and Bucharest, Deloitte provides outsourcing services to our clients across Europe.



Technologies

Our team includes experts focusing on technologies and related current market trends.



One-stop-shop attitude

Complex services from the first analysis to implementation.



International team

Access to an extended Risk Advisory Global Network that assisted many of the world’s leading financial services organisations in all aspects of the AML/CFT framework.

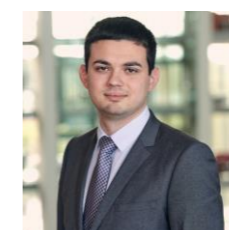
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