

Who are you really doing business with?

Anti-Money Laundering Services



Your issue

The anti-money laundering (AML) regulatory and law enforcement landscape is undergoing significant change. Recent high-profile money laundering cases have produced more stringent risk assessments, know your customer (KYC) and transaction monitoring standards. Positioning your institution to respond to these new standards is a critical component of effective risk management to assist your organization in protecting its reputation, revenue, and capital.

Our solution

Deloitte has assembled a team of dedicated AML practitioners to assist you in your efforts to enhance your AML program. These professionals have extensive knowledge of financial services and AML-related know-how, as well as experience in performing risk assessments and compliance overviews. Our team of AML specialists comprises former bank regulators, seasoned financial services executives, technology specialists, and forensic investigators.

Our services include:

- **Compliance programs and control systems** designed to assist in the management of regulatory risk, such as:
 - Account opening and closing
 - Customer risk rating, due diligence, and account monitoring
 - Internal controls and systems
 - Assessments and independent testing of existing AML compliance programs
 - Assistance in responding to regulatory enforcement actions
- **Transactional analysis** in areas such as retail, private wealth management, and correspondent areas, both proactively and pursuant to regulatory orders. Our work includes identifying relevant transactions to address suspicious activity and currency reporting requirements, and assisting counsel in developing theories of defense in the context of criminal and civil investigations. Lessons learned from the transactional analyses are used to help modify and improve “business as usual” transaction monitoring protocols and management reporting.
- **Risk and control services** that assess the internal control environment and risk management processes to identify those areas and/or activities that are most vulnerable to money laundering. We also assess and document core business unit operations and make recommendations for enhancements. We can assist you in establishing reporting lines and escalation procedures to help keep senior management and boards of directors informed of regulatory risks.

Illustrative examples of our work

- Deloitte has assisted financial institutions in Japan with AML program management planning. We provided a strategic review of current practices and assisted the banks in the creation of a comprehensive AML management framework. Our specialists supported the creation of the banks' KYC guidelines.
- Deloitte performed a gap analysis for a large Japanese bank's AML program referencing Japanese laws and regulations, FATF recommendations, and other guidelines. Our involvement included interviews with senior management, business line leaders, and AML compliance officers. We prepared a roadmap detailing recommendations for improving the AML compliance framework.
- Deloitte assisted megabanks in Japan with a business risk assessment and the creation of an AML risk rating model. We identified inherent and residual money laundering risk across business lines and assisted the banks to create a risk heat map and customer risk rating model.

- **Compliance training** related to global AML requirements and international organizational protocols such as Financial Action Task Force (FATF). We develop, customize, and deliver comprehensive training programs to address the risk inherent in an organization's products, delivery channels, operations, and customer base.
- **Independent testing** to test the effectiveness of the total AML regime within an institution, including internal controls, policies and procedures, and IT monitoring systems. The results of the testing will help document any gaps between existing practices and regulatory requirements/sound industry practices. Remedial programs will be designed to help correct any observed deficiencies.
- **Internal investigations** to help answer the *who, what, when, where, why, and how* questions that give rise to an inquiry, whether self-initiated or resulting from a regulatory, judicial, or law enforcement request.

The Deloitte difference

We are able to draw from the deep intellectual capital of over 4,500 Financial Advisory Services professionals within the Deloitte Touche Tohmatsu member firms and their affiliates worldwide. Access to this broad base of knowledge enables our professionals to address an extensive range of issues including people, process, and technology. Our services are scalable and can be tailored to your industry and specific needs.

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