Course Overview

Day 1 (AML, CFT, Sanctions)

9:00 till 10:30

Setting the Stage: Anti-Money Laundering and Combatting Terrorist Financing Basics

- The Weakest Link: Trade, Freight, Shipping and AML CFT (A review by the Economist)
- Current international cases, fines, and legal judgments
- AML/CTF success stories
- Corporate and economic implications of AML/CTF
- Key terms, definitions, and institutional differences
- Legal and regulatory background to AML/CFT
- Being on the same page: Defining terms, language, process in AML, CTF, and Sanctions

Case Study and Simulation Exercise 1: Delegates will, through review of a case, be assigned roles (customers, business line, middle and back office, compliance and legal, regulators) to analyze intelligence for possible money laundering activity/terrorist financing, escalation, reporting, investigating, and resolution)

10:30 till 10:45

Break

10:45 till 12:00

Where It All Starts: The AML and CFT Rubric: Establishment (Condensed format)
Bank of Mauritius Guidance on AML and CFT
12:30 till 13.30
Lunch

13:30 till 14:30
Analysis of U.S. FFIEC Guidance on AML, CFT, and Sanctions Policy

14:30 till 15h00
The Anti-Money Laundering and CFT Programme and Effective Elements

15:00 till 15:15
Break

15:15 PM till 5:00 PM
AML/CTF Policy
Effective Elements of the AML/CTF Program Policy

CTF Goal: to aggressively identify, escalate and deter terrorist organizations’ funding and transactions networks

FATF Recommendations

FATF Global Money Laundering and Terrorist Financing Threat Assessment (GTA)

FATF: Inclusion vs Exclusion

CFT Resources

- Financial Intelligence analysis
- Sanctions administration
- Enforcement
- Financial regulatory action
- Policy expertise

### Implementation and Application of the Rubric

**Policies, Procedures, and Controls: Implementation**

- Designation of an AML Compliance Officer
- Auditing for AML: internal and external
- Ongoing training
- Due diligence
- Customer identification
- Supervision
- Reporting and information flow: suspicious activity reports
- Surveillance, systems, and investigations
- Staffing, credentials, experience, and characteristics
- Escalation
- Record keeping

END of Day 1: 5:00 PM
Day 2: Risk Based Approach to AML/CFT

9:00 till 10:30

The Case of the Federal Reserve, FFIEC, and Risk Weighting Rubric

Focus for this area will be the development, implementation and in depth analysis of risk and development of risk matrices, as well as factors for an effective risk assessment.

- Geography and country risk
- Business risk
- Product risk
- Reputational risk
- Transaction risk
- Client risk
- Process risk

Danger Zones: Failures
- AML/CTF compliance policy
- Faulty testing
- Unsatisfactory training and non-compliance with training requirements
- Insufficient resources: systems, technology, and staff
- Lack of follow up: connect the dots

Organizational Settings
- Laws, rules and regulations
- International organizations
- Information sharing
- Industry organizations

10:30 till 10:45

Break

10:45 till 11:30

Forensic Review of Surveillance and Investigation

- Dissecting an AML/CTF Investigation
- A day in the life of an AML/CTF surveillance team
- Identification of red flags
- Business line specific AML/CTF issues
- Technology and AML/CTF: technology-based schemes, and technology-based monitoring, surveillance, and detection
11:30 till 11:45

Know Your Customer Best Practices

- Policy statement
- Rationale
- Customer identification programme
- Application of the customer identification programme
- Covered customers
- Data collection: individuals, institutions, official/governmental organizations
- Verification: documentary vs non-documentary
- Logical consistency
- Additional measures
- Lack of verification
- Data from external financial institutions
- Service providers
- High risk accounts

11:45 till 12:30

Special Topics

- Shell banks
- Politically exposed persons
- Correspondent banks and foreign banking relationships
- Enhanced due diligence
- Identity theft
- Charitable organizations
- Volume

12:30 till 13:30

Lunch

13:30 till 14:30

Monitoring Customer Relationships

- Consistency
- Pattern analysis
- Aggregation
- College knowledge vs flagrant indifference
- Risk rating
- Monitoring credit relationships
14h30 till 15h30

AML/CTF in Practice: Implications for Business Lines

- Internet gambling
- Cards (Debit, Credit & Prepaid) as well as eCommerce
- Insurance fraud and Tax Evasion
- Wire transfers
- Check collection
- Funds transfer and money transmittal
- Currency and monetary systems

15:30 till 16:30

Class Exercise and Simulation:
Analysis of AML risk assessments and methodologies

16:30 till 17h00

Evaluations, Closing