What is AFC Compliance?

AFC = Anti-Financial Crime

- AML – Anti-Money Laundering Program
- CTF – Counter-Terrorist Financing
- ETS – Economic Trade Sanctions Program
- KYC – Know your Customer Program
- ABC – Anti-Bribery & Corruption Program
What does an AFC professional do?

• Policy Management
• AFC Investigations
• AFC Reporting - SARs
• Risk Assessments
• Training & Education
• Record Keeping
Advisor and gatekeeper for Business Success
Central Bank of Ireland – AML/CTF Risk Evaluation Questionnaire

Anti-Money Laundering, Counter-Terrorist Financing and Financial Sanctions Pre-Authorisation Risk Evaluation Questionnaire

For Payment Institution and Electronic Money Institution Applicants

October 2017
Risk Assessment – Skills Set – Entry Level

Investigations
- KYC Workflow and analysis
- Identification Verification
- Customer Risk Rating
- AML Investigation
- AML Trends and Typologies
- Screening Databases
- Technology Skills

Controls Testing
- Transaction Testing to AML Controls
- Exception Monitoring
- Customer Due Diligence testing
- Business Due Diligence
- UBO identification
Risk Assessment – Skills Set – Mid Level

### Policy Creation and Review
- CDD Requirements – AMLD / CIP / GDPR
- STR / SAR Reporting
- Determination levels for BSA / MLRO
- QA Management
- Timeliness of Case Reporting
- Operational Workflows
- Investigation Controls
- Escalation of Suspicious Transactions
- Record Keeping

### Transaction Monitoring
- Transaction Risk Model Structure
- Risk Model documentation and governance
- Risk Model Controls review and testing
- Transaction Filtering
- Risk Model Scope and completeness
Risk Assessment – Skills Set – Senior Level

2. Establish Governance

2.1 Risk Assessment

<table>
<thead>
<tr>
<th>Risk Assessment</th>
<th>Frequency</th>
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<tbody>
<tr>
<td>(a) Has the firm performed a risk assessment of ML/FT and IT risks for all its proposed business lines?</td>
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<td>(b) What is the proposed frequency of review and update of the risk assessment?</td>
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<td>Please Select</td>
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<table>
<thead>
<tr>
<th>Brief rationale for not carrying out the risk assessment</th>
<th>Proposed Business lines NOT included in the firm’s risk assessment</th>
<th>Proposed completion Date</th>
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<td>Click here to enter a date.</td>
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(d) Based on the firm’s risk assessment, what ML/FT risk rating would apply?

<table>
<thead>
<tr>
<th>Inherent Risk</th>
<th>Risk Rating</th>
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<tbody>
<tr>
<td>Product and Services</td>
<td>Please select</td>
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<tr>
<td>Customer</td>
<td>Please select</td>
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<tr>
<td>Geography</td>
<td>Please select</td>
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<tr>
<td>Distribution</td>
<td>Please select</td>
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<tr>
<td>Overall Firm</td>
<td>Please select</td>
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</table>

(e) Please describe the internal control mechanisms that the firm has established to assess the ML/FT risks associated with its proposed business to include (for firm):
- Customer base;
- The products and services provided;
- The distribution channels used; and
- The geographic areas of operation.

(f) Please provide a copy of the firm’s assessment of the ML/FT risks associated with its business, including the risks associated with the firm’s customer base, the products and services provided, the distribution channels used and the geographical areas of operation.

Risk Assessment Framework

- Risk Appetite Matrix
- Product Risk Profile Reviews
- Risk Levels
  - Customer
  - Geography
  - Value at Risk
  - Frequency
  - Case Type

Regulatory Understanding and Application

- EU Regs - PSD2, AMLD, GDPR, PAD
- BSA Manual, OFAC, CIP
- ABC Global Obligations – FCPA, UK, South Korea
- MLRO Reporting
- Compliance Management
- AFC Corporate Governance reporting to Business
Full Scope Career pathway through all programs
AML Program Pathway
CTF Program Pathway
KYC Program Pathway

Head of AFC Compliance

MLRO | BSA Officer | AFC QA Manager | Compliance Training Manager | KYC Program Manager | AML Program Manager | CTF Program Manager | AIC Program Manager

KYC Policy Owner

KYC Operations Workflow | KYC Transaction Monitoring | KYC Investigations Reviewer

KYC Associate | KYC Analyst | Senior KYC Investigator

SDO Investigations | CDD Reviews | EDD Reviews

Vendor Risk | Customer Risk | Geographic Risk | Product Risk | Operational Risk

KYC Risk Model

KYC Risk Manager

KYC Trends Metrics

KYC Regulatory Reviews

KYC CDD Intermediate

KYC CDD

Improve customer due diligence and know your customer skills.

Go beyond basic Know Your Customer / Customer Due Diligence skills.
AFC Training Program Pathway

ACAMS AML General Awareness is an e-learning tool designed for large organizations to reach employees at every level of the company, making them aware of their roles and responsibilities in detecting and preventing money laundering and terrorist financing. The online tool adapts to each employee’s current understanding of AML principles, creating less demand on their time.
ABC Program Pathway

The Advanced Financial Crimes Investigations Certification

AML White Paper
AUDIT, BRIBERY, CORRUPTION

Why Can’t We All Just Get Along? A call for the convergence of AML and ABC compliance functions at financial institutions
AFC QA Program Pathway

Compliance Audit: Evaluating and Balancing Country Risk and Regulatory Risk

Head of AFC Compliance

MLRO
BSA Officer
AFC QA Manager
Compliance Training Manager
ETS Program Manager
KYC Program Manager

The Advanced AML Audit Certification

Investigations QA Analyst
Internal Audit Testing
Regulator Examinations
QA Metrics
Career Pathway Changes due to Tech Innovation

- KYC Automation
- Blockchain
- AML Risk Models
- Skills “AI”
- ABC Transaction Monitoring

- Cyber-Enabled Crime
  Identify where your organization is most vulnerable to cyber attack.

- Virtual Currency and Blockchain
  Understand the technology. Mitigate the risks.
AFC Career Eco-System

34 Career Opportunities
• 18 Entry Level
• 8 Mid Level
• 10 Senior Level

5 Program Types
• AML
• CTF
• ETS
• KYC
• ABC

Upskill Opportunities
• Risk Management
• Tech Engineering
• BlockChain
• Digital Currency
• Change Management
WHY
WE DO IT
Thankyou