AML/CFT Compliance in external accounting services







Support of compliance roles in execution of AML/CFT compliance programs

This offer concerns supporting the AML/CFT compliance function of the external accounting service providers in the execution of its duties in particular resulting from the AMLD5 (Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 amending Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, and amending Directives 2009/138/EC and 2013/36/EU)

WORKFLOW













Overview of available services



Training (examples)

- Compliance Programme and Three Lines of Defence
- AML/CFT risk management in the context of implementation of AMLD4 or AMLD5 and most recent guidelines of FATF, European Banking Authority, US Treasury, FinCEN, the Polish Financial Supervision Authority, the Polish FIU, and many more
- Incident response in case of detected non-compliance
- Corporate criminal, administrative and management liability in the context of the AML/CFT non-compliance & strategies mitigating the risk of exposure towards such liabilities
- Other tailored training on Client's demand



Subscription based services

- Time commitment based on subscription model is available for Clients interested in daily basis counsel and advice in respect to AML/CFT compliance matters
- The advice covers not only AMLD5 compliance but also FATF 40 +9 Recommendations, the US Bank Secrecy Act and other AML/CFT Standards



Project based commitment

- Time and material-based commitment in respect to any compliance subject as defined in alignment with the Client
- Sample prior project experience includes, but is not limited, to:
 - Implementation of AML/CFT programmes, including Risk Based Approach measures in banking sector pursuant to enforcement of AMLD3/AMLD4
 - o Investigations in breaches of the OFAC Sanctions
 - AML/CFT Compliance reviews, including Gap Analyses between as-is and as-it-should-be
 - Support in design of AML/CFT risk assessment methodologies and setting risk appetite levels
 - Support in selection of AML/CFT technology



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