

Transaction Monitoring

- > Corroborating transactions: existence, value, rights and obligations
- > Due diligence and review on counterparties to the transactions
- > Escalation of alerts, treatment of alerts, investigation and announcement to MROS

Madhumita Jha,
Senior Manager, Forensic & Integrity Services,
Ernst & Young AG, Zurich

Tomasz Wolowski,
Senior Manager, Risk & Regulatory | Compliance & Regulations,
PWC, Zurich

Alister Smith,
Senior Manager, Risk & Regulatory | Compliance & Regulations,
PWC, Zurich

Marina Ikononidi,
LL.M. University of Fribourg, Regulatory & Compliance Independent Advisor

9.00 Transaction monitoring: challenges and good practices

- Expectations in the regulation and good practices
- Quality of data needed for an efficient control
- Link between KYC and KYT
- Impact on the level of risk of the client
- Setting up of scenarii to identify the unusual and suspicious transactions

Madhumita Jha

9.40 How to corroborate the existence, value, and certain rights & obligations of the transactions: which documents should be obtained, and how to analyse them?

- How to corroborate the existence of transactions: sourcing and analysis of the documents that enable to corroborate the transactions in the case of a gift, a sale, an inheritance
 - How to corroborate the value of transactions: art, real estate, non listed company/ private equity
 - How to corroborate the intragroup transactions with weak justification (ex : consultancy fees) or which justification is not verified (repayment of a loan)
- Tomasz Wolowski and Alister Smith**

10.20 Which due diligence and review work must be done on counterparties to the transactions?

- Typology of counterparties: remitting party, funding party, beneficiary
- Roles across the three lines of defense
- What research must be performed on counterparties and on the links between counterparties and clients?
- What research must be performed on the links between the counterparties which transfer the funds to the account and the counterparties who receive some funds : flow-through account?
- What can research on counterparties reveal: what are we looking for: a hidden UBO, a circumvention of sanctions, bribes?
- How to perform this research: counterparty due diligence including contract analysis, research, and interviews

Tomasz Wolowski and Alister Smith

10.50 Coffee break

11.10 Escalating alerts

- Which procedures to evaluate and escalate the alerts? What are the usual deficiencies in this field?
- Advanced analytics for triaging alerts
- When LOD1 is in the loop: does the RM speak about this to the head of the desk before escalating to the compliance department? Does the BRM consult with the RM before escalating to the compliance? Who makes the decision to escalate?
- Escalation to compliance in practice: too many or too few escalations? How can the compliance measure the situations which should have been escalated and which were not?
- How to document an alert and its follow-up?
- Which reporting to put in place?

Madhumita Jha

11.40 Treatment of the alerts, investigation, announcement to MROS: recurring questions

- Quality of treatment of an alert and substance of the explanation
- What is the limit between an AML alert and the opening of an investigation
- Definition of AML alert
- Criteria for opening an investigation
- Decision process
- Management of the non treated alerts (suspens)
- Identification of Pending
- Strategies of management of the alerts
- Delays and compliance
- Possible announcement to MROS
- Obligation to Declare
- Consequences of the Declaration

Marina Ikononidi

12.30 End of the conference

Conference accredited by VSV-ASG:
3 credits



ZURICH, FRIDAY 6 DECEMBER 2024, ZURICH SHERATON HOTEL, 9.00-12.30 / ONLINE

INFORMATION & REGISTRATION

Tel: +41 22 849 01 11
info@academyfinance.ch
Academy & Finance SA
Rue Neuve-du-Molard 3,
CH-1204 Genève
www.academyfinance.ch

FEE

620 CHF + VAT (8.1%)
Asset managers and trustees members of VSV-ASG: 560 CHF + VAT (8.1%)
Additional participants from the same company: -50%

I register to the seminar "Transaction monitoring" on 6 December 2024.

Attendance: in the conference room online on Zoom VSV-ASG Asset manager/trustee

Full name

Position Company.....

Address

Zip code/City

Tel Mobile.....

E-mail.....

Date Signature.....