ACADEMY & FINANCE

Commercial accounts and operational companies: which specific AML monitoring is expected?

> What specific kind of monitoring is expected for this type of business relationship: identification of related parties, counterparties, internal organization, etc.?
> How to verify the reality of intra-group transactions? How to detect predicate offenses to ML?

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14.00 **Operational companies, domiciliary companies and holdings**
• What distinguishes operative companies from domiciliary companies?
• How should companies without staff or offices be classified? Which criteria of economic presence are decisive for categorization?
• How do holding structures (pure, management, mixed) differ, and what are their implications for the management of subsidiaries?
• What disclosure obligations and forms are relevant in practice?
• How does company classification affect compliance obligations? How does classification intersect with anti-money laundering obligations?
Filippo Spalletta and Vanessa Bürge

14.30 **AML life cycle management for commercial accounts/commercial companies**
• Specificities of KYC, KYT, SOW (Source of Wealth), SOF (Source of Funds)
• KYC, onboarding
• Monitoring of commercial transactions
• Periodic reviews, consideration of sanctions regimes
Tomasz Wolowski and David Nikita Drakopoulos

15.20 Coffee break

15.40 **Compliance management of commercial/ operational groups**
• What specific monitoring is expected for this type of business relationship (identification of related parties, counterparties, internal organization, etc.)?
• How to ensure effective monitoring of commercial accounts and what internal expertise is required (accounting, tax, financial, etc.)?
• How to verify the reality of intra-group transactions and detect predicate offenses to money laundering?
• Focus on specific transactions:
- Intra-group loans: key points, documentation, corroboration, follow-up
- Dividend distributions: red flags, documentation, corroboration
- Intra-group service provision: transfer pricing and tax optimization issues
Taulant Avdija

16.30 **Should counterparty relationships be monitored? And how can this be done?**
• What types of relationships should be identified (family, business, etc.) and how should this link be recorded in the file/system?
• What monitoring and oversight are expected between counterparties?
Olivier Maes

17.00 **Preparatory work required to apply trade sanctions**
• Screening and verification of partners
- Implement screening tools to check clients, suppliers, and partners against sanctions lists
- Carry out enhanced due diligence for high-risk areas or sensitive products (dual-use goods, advanced technologies)
• Documentation and traceability
- Keep comprehensive documentation of transactions and verifications performed
• Risk assessment
- Identify geographic areas, products, or clients exposed to sanctions risks
- Adapt commercial strategies to avoid inadvertent violations
• Specific contractual clauses
- Include non-re-exportation or sanctions-compliance clauses in contracts
- Provide for termination mechanisms in case of sanctions violations
Olivier Maes

17.40 End of the seminar

ZURICH, THURSDAY 4 DECEMBER 2025, 14.00-17.40, ZURICH SHERATON HOTEL / ONLINE

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620 CHF + VAT (8.1%)
Additional participants from the same company: -50%

AF 1454

I register to the seminar "Commercial accounts and operational companies : which specific AML monitoring is expected?" on 4 December.

☐ I will attend in the conference room ☐ I will attend online on Zoom.

Full name ....

Position .... Company..........................

Address ....

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Date .... Signature..........................