

The AML Risk Analysis today:

FINMA's expectations, market trends, audit conclusions

- > Rising inherent risk criteria, today's risk landscape
- > Analysis of the relevance of the enhanced risk criteria of the business relationship
- > Risk tolerance is becoming a recurring FINMA supervisory focus

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INHERENT RISKS

9.00 Analysis of inherent risks today

- Global Developments shaping today's risk landscape
- Current Market Trends and Challenges - Practical insights
- Rising Risk Criteria and developing Regulatory Expectations
- Impact of the June 2026 updated FINMA Guidance
- Implications for Risk Models

Massimiliano Monteleone and Marco Kühne

ENHANCED RISK CRITERIA

9.40 Analysis of the relevance of the enhanced risk criteria of the business relationship: what do auditors and FINMA expect in this regard?

- The relevance assessment as a preliminary step to the risk analysis;
- The underlying methodology, including the required scope and documentation;
- The enhanced criteria and transactions, focusing in particular on how they are incorporated into the AML risk analysis; and
- The frequency and periodic review of the relevant criteria

Céline Koch

10.20 Coffee break

CONTROL MEASURES AND BUSINESS MODEL

10.40 Acting on risk to reduce residual risk: control measures or action on the business model

Because many institutions pile up controls to compensate for an overly risky business model without ever questioning the activity itself, FINMA clearly distinguishes between two families of actions to reduce residual risk: control measures (acting on the risk) and structural measures (acting on the business model).

- If both types of measures are complementary, do they have the same impact and scope? When institutions "overinvest" in controls, do they adjust their business model, even when the structural risk is incompatible with their risk tolerance?
- Acting on risk or control measures – what does this mean? If the objective is to reduce the probability or impact of a risk without modifying the activity itself, can controls compensate for a business model that is intrinsically too risky? Can control measures be the only lever?
- Acting on the business model: structural measures – what does this mean? If these measures are the most powerful but also the most difficult (as they affect

strategy, the client portfolio, products and markets), can risk be reduced at its source, i.e. by modifying the activity so that it becomes compatible with the institution's risk tolerance? What are examples of structural measures? Exiting certain high-risk markets, ceasing to offer complex legal structures, reducing the proportion of offshore clients, abandoning sensitive payment corridors, limiting or prohibiting foreign PEPs.

- How to move forward? How can the two types of measures be articulated within a FINMA framework? Outline of possible solutions.

Olivier Maes

RISK TOLERANCE

11.20 Definition and application of risk tolerance: why does FINMA keep pointing out this issue year after year?

- What is risk tolerance according to FINMA?
- Why does FINMA criticize this point every year? Possible explanations: confusion between risk assessment and risk tolerance, lack of risk quantification, disconnect between risk tolerance and operational processes, lack of consistency with the business model (in relation to the target client base, products, markets and structural risks), lack of effective governance (e.g. insufficient involvement of board members, absence of reporting on compliance with limits, or undocumented adjustments).
- Risk tolerance is becoming a recurring FINMA supervisory focus. What is specifically reviewed? Incomplete documentation, inconsistencies between policy and practice, existence of quantitative or even qualitative thresholds, and links with AML, sanctions, credit and other controls.
- How can this be addressed? What could be the solutions at the strategic, tactical and operational levels?

Olivier Maes

12.00 End of the seminar

The AML risk analysis today

PRACTICAL INFORMATION

Venue

Zurich Sheraton Hotel
Pfingstweidstrasse 100, Zurich

Visio conference on Zoom

The Zoom link and the documentation will be sent to the participants on 11 November in the afternoon. Academy & Finance provides technical assistance during the conference.

How to register

by phone: +41 (0) 22 849 01 11
by e-mail: info@academyfinance.ch
by post: Academy & Finance SA
3 rue Neuve-du-Molard, CH-1204 Geneva
www.academyfinance.ch

Fees

540 CHF (+ VAT 8.1%)
Additional registrations from the same company: - 50%

Registration and payment

Payment is made by bank transfer or by credit card. Credit card payments will be debited immediately upon receipt of card details. In any case, we will send you an invoice by email.

Substitution & cancellation policy

Substitutions from the same company are accepted at any time. Cancellation requests must be received in writing, by fax or by post up to the following dates end of business:

- 5 November refund of 90%
- after 5 November no refund will be made for cancellation.

REGISTRATION FORM

I register for the seminar "The AML risk analysis today" in Zurich on 12 November.

☐ I will attend in the conference room

☐ I will attend online on Zoom

FIRST PARTICIPANT

Full name.....

Position.....

E-mail.....

SECOND PARTICIPANT (-50%)

Full name.....

Position.....

E-mail.....

Company.....

Address.....

Postcode..... City.....

Tel Mobile.....

Person to which the invoice must be sent for payment:

Name..... Email.....

Bank transfer ☐ Mastercard ☐ VISA ☐

Credit card No : ____/____/____/____ Expiry date : ____/____

Cardholder.....

Date Signature.....