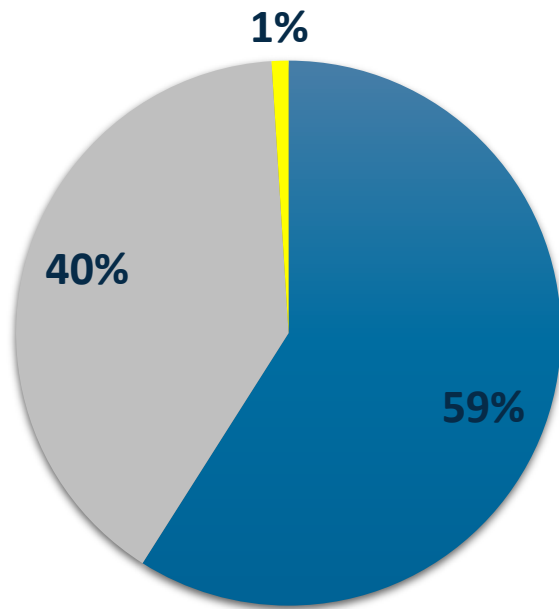


Due Diligence

Asking the right questions at the right time...
...And getting answers from the right places

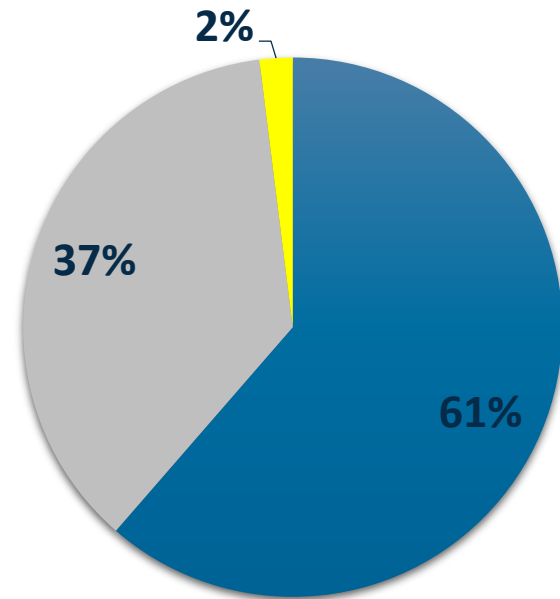
MLROs

– if you felt like you needed a summer holiday....



Workload past 12 months

- Increase
- Same
- Decrease



Workload next 12 months

Regulatory Backdrop

– more rules, encompassing more organisations and greater scrutiny

How laundered money shapes London's property market

Panama Papers bring ownership via offshore companies back into focus



**GAMBLING
COMMISSION**

2017 No. 692

FINANCIAL SERVICES

The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017

Made - - - - at 9.20 a.m. on 22nd June 2017

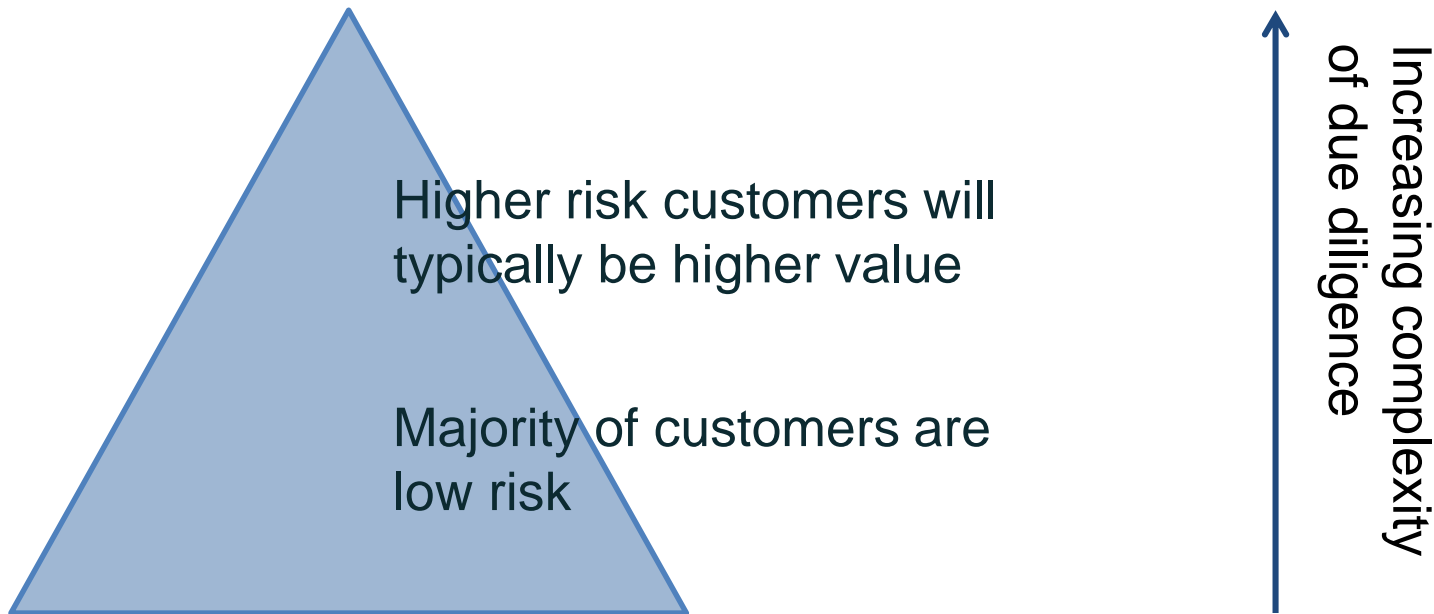
Laid before Parliament at 4.30 p.m. on 22nd June 2017

Coming into force - - 26th June 2017

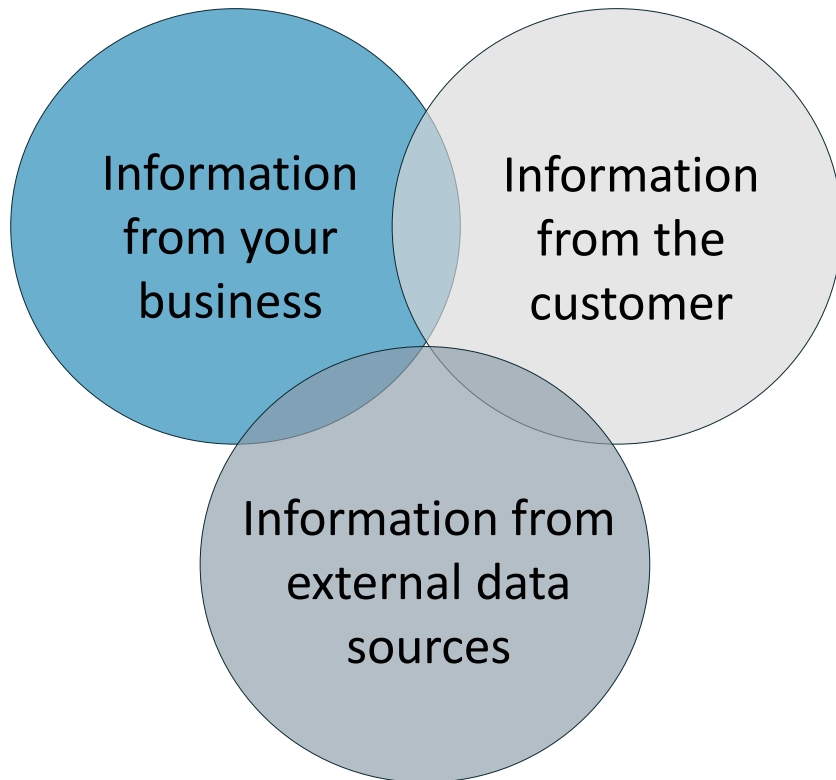
Due Diligence

– *the heart of a Financial Crime programme*

An assessment of money laundering risks will result in the application of appropriate **due diligence** when entering into a relationship and ongoing **due diligence** and monitoring of transactions throughout the course of the relationship.



Where does my data come from?



- Client selection
- Risk Assessment
- Due Diligence and Acceptance
- Name Screening
- Transaction Monitoring
- Transaction Screening
- Ongoing Screening

Where does my data come from?

- PEP
- Country Risk
- Adverse Media
- Source of Wealth / Funds
- Sanctions exposure
- Tax Evasion
- Ultimate Beneficial Ownership

“ ...operators should satisfy themselves that the sources are suitable to mitigate the full range of risks [including] money laundering and social responsibility risks...

Local or open source information, such as press reports, may be particularly helpful in carrying out these checks. However, operators should ensure that they are not placing an overreliance on one source of information to conduct these checks...”

An effective risk-based approach requires high quality data at every stage

- Is access to data slowing down my onboarding?
- Am I at risk of too many results? Or too few?
- Have I got the right mix of automation and human analysis?
- Where am I spending my time – collection or analysis?

In House?

Managed service?

Technology enabled?

Technology driven?

Dispersed operating model?

Centralized?