

## Anti-Money Laundering (AML), Foreign Corrupt Practices Act (FCPA) & Sanctions Consulting



Negative publicity, damage to corporate reputation, loss of goodwill, legal and regulatory sanctions can have an adverse effect on the bottom line. All are possible consequences of an organisation's failure to implement or adhere to policies and procedures designed to detect, prevent and address anti-money laundering activity and possible breaches of the Foreign Corrupt Practices Act.

### Who we are

Deloitte's Forensic and Dispute Services practice is composed of a diverse group of dedicated practitioners who are experienced in helping to prevent or resolve the above risks. Our group of professionals includes Chartered and Certified Public Accountants, Certified Fraud Examiners, statisticians, computer forensics specialists and former law enforcement officials.

### Our professionals:

- Are skilled in problem solving on behalf of the client
- Have the ability to communicate the facts succinctly and accurately
- Are creative in isolating key case determinants and issues
- Have highly developed analytical skills
- Possess in-depth industry knowledge and experience
- Have deeply practiced technical skills
- Are responsive in meeting client needs and deadlines

We seek to understand the unique aspects of each case, its underlying issues and facts, to determine the best approach and solutions. Most importantly, we are able to articulate our findings in an organised and persuasive manner, whether in the form of a written report or live testimony in court. Backed by the worldwide resources of Deloitte's network of member firms, we are able to bring the collective knowledge, experience and judgement of our colleagues to support our clients anywhere around the world.

## Services we offer

### • Anti-Money Laundering (AML) Consulting

The professionals in the anti-money laundering (AML) services practice at Deloitte have assisted clients with AML issues for more than 20 years. We have studied the myriad of ways money launderers operate to hide their ill gotten gains – from placement through layering to integration. We are experienced in helping clients meet the demands of implementing and monitoring AML detection and compliance programs. Working with Deloitte's worldwide network of member firms, we have designed, reviewed, enhanced, implemented and monitored numerous AML detection and compliance programs for clients around the world. Our work has included assessing AML risk at the enterprise and business unit level, drafting and enhancing policies and procedures, creating and delivering training modules, compliance assessments, forensic 'look backs' pursuant to regulatory orders, internal controls assessments, selection and implementation of technology solutions, internal investigations and the creation of enterprise-wide private sector Financial Intelligence Units.

Anti-Money Laundering Consulting services include:

- AML compliance program assessments
  - AML gap analysis
  - AML due diligence
  - AML know your customer assessments
  - AML risk and control services
  - AML technology consulting
  - AML training
  - AML transaction analysis (look back)
- ### • Foreign Corrupt Practices Act (FCPA) Consulting
- Our FCPA consulting practice helps organisations navigate FCPA risks and respond to potential violations. Utilising the network of Deloitte's member firms and their affiliates including forensic resources in the United States, Canada, Europe, Africa, Latin America and Asia, we have worked on a variety of FCPA engagements including investigations, acquisition due diligence and compliance program implementation and assessments in over fifty countries for some of the world's leading companies. We collect and analyse accounting data and other hard copy and electronic documents, including e-mail, to identify the 'red flags' of potential FCPA violations and gaps in

companies' anti-corruption controls. We have also developed a secure and powerful web-enabled tool, FCPA Analytics, which simplifies the collection and analysis of large volumes of accounting data necessary to help identify the potential 'red flags' of corrupt activity.

FCPA Consulting services include:

- FCPA investigations
  - FCPA due diligence
  - FCPA programs and controls
- ### • Economic and Trade Sanctions
- Economic and trade sanctions are imposed by governments or multi-national organisations such as the EU or UN to further foreign policy objectives, for example to address state to state security threats or human rights abuses. Sanctions generally prohibit financial institutions from entering into or facilitating transactions involving sanctioned regimes or designated entities or individuals in order to limit their access to capital markets and goods.

The challenges and risks posed by economic and trade sanctions should not be underestimated. Establishing which sanctions regime applies, and under which circumstances, is by no means straightforward. Organisations face tough decisions when striking the right balance between having a conservative enterprise-wide sanctions policy and an efficient real-time transaction screening approach that does not adversely impact its ability to execute competitively. Recent enforcement actions between global financial institutions and their regulators and law enforcement have demonstrated the potential costs, both tangible and intangible, of failure to comply with economic sanctions requirements. Most notably, to settle United States investigations after admitting violations of United States sanctions, several financial institutions have paid up to hundreds of millions in fines.

Deloitte has experience in providing overall, discrete, and timely advice on sanctions programs risk management and compliance. We have worked with many of the world's largest financial institutions and have well-established relations with the relevant regulators. With a global practice and centres of excellence, Deloitte is well positioned to assist entities including financial institutions, insurance companies and asset managers in meeting the challenges posed by corporate policy and sanctions regimes around the world.

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