

# ANTI-MONEY LAUNDERING POLICY

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## Policy Statement

[COMPANY NAME] is a legal, ethical and transparent company, and it takes the responsibility to ensure and maintain that its assets and resources are not being used for corruption, irregularities, or money laundering. The company has taken it upon itself to detect frauds, irregularities, abuse of position, and institutional gains.

## Purpose

The purpose of this policy is to make that the company's financial processes and procedures are according to the anti-money laundering laws.

## Scope

This policy applies to every entity related to [COMPANY NAME] and its employees, directors, officers, contractors, or any third party working on behalf of the company.

The policy is for internal use, and the administration is required to convey it to every concerned person or entity. Failure to comply with the policy will result in appropriate action.

## Money Laundering

Money laundering refers to those assets that are money that is acquired in exchange for money or assets gained unlawfully. It also includes money spent for terror purposes, regardless of the means it was obtained.

Under this policy, money earned by using the following means is considered money laundering, and it is prohibited;

- a. Money or assets received in exchange for criminal or unlawful acts. Money whose origin is not explicit or earned by assisting any activity in evading lawful means.
- b. Property gained after any criminal activity and its origin, location, and disposition are not transparent.
- c. Property which is promoting any unlawful activity
- d. Terrorism financing

## Compliance

The company will establish a body responsible for the implementation of this policy.

The company will carry out the procedure to identify any irregularity on behalf of any stakeholder under this policy. The company should;

- a. Identify all the financiers of the company and verify their identity
- b. Take special care where stakeholders want anonymity
- c. Maintain proper records of the stakeholders

# Bank Anti Money Laundering Policy Manual

**Federal Financial Institutions  
Examination Council**



## **Bank Anti Money Laundering Policy Manual:**

**Handbook of Anti-Money Laundering** Dennis Cox, 2014-10-23 Effectively implement comprehensive anti money laundering regulations Handbook of Anti Money Laundering details the most up to date regulations and provides practical guidance toward implementation While most books focus on the regulations themselves this useful guide goes further by explaining their meaning to bank operations and how the rules apply to real life scenarios The international perspective provides a broader understanding of the anti money laundering controls that are in place worldwide with certain country specific details discussed in depth Coverage includes the Wolfsberg Principles Financial Action Task Force guidance the U S Patriot Act and the latest from both the EU and Bank for International Settlements The IMF estimates that two to five per cent of the global GDP 590 billion to 1 5 trillion is laundered every year Globally banks and other financial institutions have been required to put in place specific arrangements to prevent and detect money laundering and the criminal activity that underlies it This book provides the latest regulations and guidance toward application Understand what money laundering regulations mean in practice Reference international and country specific rules and regulations Get up to speed on the most current regulations and practices Implement the most effective anti money laundering measures In response to the increased monitoring and regulation money launderers have become more sophisticated at disguising the source of their funds Financial institutions employees must be ever more aware of what they re facing and how to deal with it making actionable guidance a critical companion to any regulatory information For financial institutions seeking more thorough understanding and practical advice the Handbook of Anti Money Laundering is a comprehensive guide *Bank Secrecy Act/Anti- Money Laundering Examination Manual* Federal Financial Institutions Examinati, 2015-05-20 NO FURTHER DISCOUNT ON THIS ITEM OVERSTOCK SALE Significantly reduced list price while supplies last This manual provides guidance to examiners for carrying out Bank Secrecy Act Anti Money Laundering and Office of Foreign Assets Control OFAC examinations An effective Bank Secrecy Act Anti Money Laundering compliance program requires sound risk management This manual also provides guidance on identifying and controlling risks associated with money laundering and terrorist financing Al Qaeda The Many Faces of an Islamist Extremist Threat Report June 2006 can be found here <https://bookstore.gpo.gov/products/sku/052/070/07483/3> Operationalizing Counter Threat Finance Strategies can be found at this link <http://bookstore.gpo.gov/products/sku/008/000/01131/1> Economic Security Neglected Dimension of National Security can be found at this link <http://bookstore.gpo.gov/products/sku/008/020/01617/9> also available as an ebook at this link <http://bookstore.gpo.gov/products/sku/999/000/44440/9> Armed Groups Studies in National Security Counterterrorism and Counterinsurgency can be found at this link <http://bookstore.gpo.gov/products/sku/008/020/01573/3> CONTROLLED ITEMS REQUIRE SPECIAL ORDERING PROCEDURES Please see links to the US Government Online Bookstore to find out how to order Controlled items Trade Based Money Laundering Reference Guide English Language Edition Package of 5 Controlled Item is available here <https://bookstore.gpo.gov/products/sku/008/020/01573/3>

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Controlled Item can be found here [https://bookstore.gpo.gov/products/sku/008\\_001\\_00226\\_2](https://bookstore.gpo.gov/products/sku/008_001_00226_2)      **Handbook on Anti-Money Laundering and Combating the Financing of Terrorism for Nonbank Financial Institutions** Asian Development Bank, 2017-03-01 This handbook provides nonbanking financial institutions guidance on how to manage risks associated with money laundering and the financing of terrorism It reflects the requirements of the international standard setter in the fight against money laundering and terrorist financing the Financial Action Task Force and is intended to serve as the basis for developing internal controls and procedures by nonbanking financial institutions to combat such actions      *Mastering Anti-Money Laundering and Counter-Terrorist Financing* Tim Parkman, 2019-11-27 This book offers best practice advice on how to meet anti money laundering AML regulations and will help you put together an effective framework to meet your legal obligations It includes a comprehensive selection of example documents checklists and an unrivalled collection of training materials The full text downloaded to your computer With eBooks you can search for key concepts words and phrases make highlights and notes as you study share your notes with friends eBooks are downloaded to your computer and accessible either offline through the Bookshelf available as a free download available online and also via the iPad and Android apps Upon purchase you will gain instant access to this eBook Time limit The eBooks products do not have an expiry date You will continue to access your digital ebook products whilst you have your Bookshelf installed      *The Critical Handbook of Money Laundering* Petrus C. van Duyne, Jackie H. Harvey, Liliya Y. Gelemerova, 2018-12-30 The overarching aim of this book is to bring order to the subjects of money laundering and of the anti money laundering frameworks that have been written over the past thirty years It provides scholars practitioners and policy makers with a guide to what is known of the subject thus far The book examines critically the underlying assumptions of research and of policy making in the field and offers a systematic review of the most important policy and academic literature on the subject      *Non-financial Risk Management in the Financial Industry* Norbert Gittfried, Georg Lienke, Florian Seiferlein, Jannik Leiendecker, Bernhard Gehra, Katharina Hefter, Felix Hildebrand, 2025-09-16 Managing compliance operational digital AI and sustainability risks has become increasingly critical for businesses in the financial services industry Furthermore expectations by regulators are ever more demanding while monetary sanctions are being scaled up Accordingly non financial risk NFR management requires sophistication in various aspects of a risk management system This handbook analyses a major success factor necessary for meeting the requirements of modern risk management an institution specific target operating model integrating strategy governance organisation risk management data architecture and cultural elements to ensure maximum effectiveness Fully updated to reflect the latest regulatory and industry developments the second edition features two brand new chapters on the deployment of Gen AI in non financial risk management and cyber resilience in financial institutions The book has been written by senior NFR experts from key markets in Europe the US and Asia It gives practitioners the necessary guidance to

master the challenges in today's global risk environment. Each chapter covers key regulatory requirements, major implementation challenges as well as both practical solutions and examples.

**Banking and Finance Dispute Resolution in Hong Kong** Sau Wai Law, 2023-08-25. This book examines the concept of naming, blaming, claiming in the application of arbitration for private banking dispute resolution. The author focuses on examining this issue using Hong Kong as a case in point, blending theory and empirical evidence to unveil how disputes are resolved within the banking and finance industry, which will enable them to explore possible effective and efficient mechanisms to resolve financial disputes. The book offers a comprehensive review of the laws and regulations governing the private banking industry in Hong Kong and selected jurisdictions as well as how they are implemented. It examines the clients' perceptions through an innovative methodology for empirical studies. Describing how clients react to the laws and regulations and the potential adverse impacts to the stability of the banking industry, the author identifies possible factors that could trigger another financial crisis. Synthesising his analysis, the author proposes newly discovered self-corrective mechanisms embedded among clients and concludes with policy recommendations. Directly relevant to banking practitioners, particularly legal and compliance departments and senior management, the book is also written for legal professionals interested in the practices of dispute resolution in banking and finance. Additional readerships will include bank regulators, government officials, policy makers, researchers, and those involved in courses in banking and financial law as well as Arbitration and Dispute Resolution.

Preventing Money Laundering and Terrorist Financing, 2009. Money laundering and terrorist financing are serious crimes that affect not only those persons directly involved but the economy as a whole. According to international standards, every bank has the obligation to know its customers and to report suspicious transactions. Although these obligations sound straightforward, they have proved challenging to implement. What information precisely has to be gathered? How should it be recorded? If and when does one have to file a suspicious transaction report? It is here that a supervisor can play a crucial role in helping supervised institutions first in understanding the full extent of the obligations of Customer Due Diligence and Suspicious Transaction Reports (STR) and second in ensuring that those obligations are not just words on paper but are applied in practice. Effective supervision is key to the success of a country's AML/CFT system. In this regard, field work in both developed and developing countries has shown an overall low compliance in the area of supervision of banks and other financial institutions; supervisory compliance is indeed generally lower than the average level of compliance with all Financial Action Task Force recommendations. As a result, by providing examples of good practices, this book aims to help countries better conform to international standards. In this regard, this handbook is specifically designed for bank supervisors.

**Money Laundering and Foreign Corruption** United States. Congress. Senate. Committee on Governmental Affairs. Permanent Subcommittee on Investigations, 2004.

**Research Handbook on Money Laundering** Brigitte Unger, Daan van der Linde, 2013-01-01. Although the practice of disguising the illicit origins of money dates back thousands of years, the concept of money

laundrying as a multidisciplinary topic with social economic political and regulatory implications has only gained prominence since the 1980s This groundbreaking volume offers original state of the art research on the current money laundrying debate and provides insightful predictions and recommendations for future developments in the field The contributors to this volume academics practitioners and government representatives from around the world offer a number of unique perspectives on different aspects of money laundrying Topics discussed include the history of money laundrying the scale of the problem the different types of money laundrying the cost to the private sector and the effectiveness of anti money laundrying policies and legislation The book concludes with a detailed and insightful synthesis of the problem and recommendations for additional steps to be taken in the future Students professors and practitioners working in economics banking finance and law will find this volume a comprehensive and invaluable resource *Anti-Money Laundrying Compliance Handbook* Bob

Walsh,2015-10-14 This AML Compliance Handbook is a must for all AML professionals It has been prepared with clear specific information to serve as a practical quick reference guide for regulated companies and their staff whose responsibilities involve compliance in this vital area The following subject areas comprise the essential components of a sound well rounded AML compliance program AML regulatory compliance requirements Know your customer KYC procedures Currency transaction reporting CTR processing Structuring of transactions Foreign Corrupt Practices Act FCPA Office of Foreign Assets Control OFAC Correspondent relationships Wire transactions Red flag suspicious transactions Transaction monitoring practices Due diligence research SARs processing Terrorist organizations AML KYC technical training Case studies and AML KYC acronyms The information presented by Bob Walsh has been compiled from decades of in depth hands on experience in the field of Anti money Laundrying This includes working with some of the largest domestic and international banks AML KYC consulting agencies Federal Bureau of Investigation and the Federal Reserve Bank of New York in addressing major AML KYC cases Anti-Money Laundrying Regulation and Compliance Alexander Dill,2021-06-25

Anti Money Laundrying Regulation and Compliance Key Problems and Practice Areas is a comprehensive treatment of the Anti Money Laundrying Combatting the Financing of Terrorism AML CFT compliance programs recordkeeping and reporting requirements and the best practices under the Bank Secrecy Act BSA and sanctions regulatory regimes AML CFT and sanctions provisions are highly interrelated Onboarding and customer due diligence requirements generate the data entered into transaction monitoring and screening systems The Oxford Handbook of Financial Regulation Niamh Moloney,Eilís Ferran,Jennifer Payne,2015 The financial system and its regulation have undergone exponential growth and dramatic reform over the last thirty years This period has witnessed major developments in the nature and intensity of financial markets as well as repeated cycles of regulatory reform and development often linked to crisis conditions The recent financial crisis has led to unparalleled interest in financial regulation from policymakers economists legal practitioners and the academic community and has prompted large scale regulatory reform The Oxford Handbook of Financial Regulation is the first

comprehensive authoritative and state of the art account of the nature of financial regulation Written by an international team of leading scholars in the field it takes a contextual and comparative approach to examine scholarly policy and regulatory developments in the past three decades The first three parts of the Handbook address the underpinning horizontal themes which arise in financial regulation financial systems and regulation the organization of financial system regulation including regional examples from the EU and the US and the delivery of outcomes and regulatory techniques The final three Parts address the perennial objectives of financial regulation widely regarded as the anchors of financial regulation internationally financial stability market efficiency integrity and transparency and consumer protection The Oxford Handbook of Financial Regulation is an invaluable resource for scholars and students of financial regulation economists policy makers and regulators *Routledge Handbook of Transnational Organized Crime* Felia Allum, Stan

Gilmour, 2012-03-15 Transnational organized crime crosses borders challenges States exploits individuals pursues profit wrecks economies destroys civil society and ultimately weakens global democracy It is a phenomenon that is all too often misunderstood and misrepresented This handbook attempts to redress the balance by providing a fresh and interdisciplinary overview of the problems which transnational organized crime represents The innovative aspect of this handbook is not only its interdisciplinary nature but also the dialogue between international academics and practitioners that it presents The handbook seeks to provide the definitive overview of transnational organized crime including contributions from leading international scholars as well as emerging researchers The work starts by examining the origins concepts contagion and evolution of transnational organized crime and then moves on to discuss the impact governance and reactions of governments and their agencies before looking to the future of transnational organized crime and how the State will seek to respond Providing a cutting edge survey of the discipline this work will be essential reading for all those with an interest in this dangerous phenomenon The Uganda Country Self-assessment Report and Programme of Action, 2007 *Bank*

*Secrecy Act/ Anti-Money Laundering Examination Manual* Federal Financial Institutions Examination Council, 2016-11-14 This manual provides guidance to examiners for carrying out Bank Secrecy Act Anti Money Laundering and Office of Foreign Assets Control OFAC examinations An effective Bank Secrecy Act Anti Money Laundering compliance program requires sound risk management This manual also provides guidance on identifying and controlling risks associated with money laundering and terrorist financing The purpose of this manual is for bank examiners to assess the structure and management of the organization s Bank Secrecy Act Anti Money Laundering compliance program and if applicable the organization s consolidated or partially consolidated approach to Bank Secrecy Act Anti Money Laundering compliance Examination procedures are detailed including the regulatory requirements and methods for reporting These programs include Foreign branches and Offices of U S banks and bank holding companies Transaction Testing methods are included that are specific to the bank s services functions to their customers such as Deposit Accounts Fund Transfers and electronic banking Exchanging

foreign currency Data and payroll services processes Check clearing Foreign exchange services Pouch activities Loans and letters of credit Lines of credit Third Party Payment Processors Privately Owned Automated Teller Machines Trade Finance activities And more Cybersecurity Cyber terrorism Espionage Theft Money Banking Law enforcement Financial fraud tracking Financial Fraud Financial Theft U S banks Foreign banks Financial Crime Bank exams Bank examiners Financial Risk Management Banking Laws Bank examination procedures BSA banking bsa aml handbook bsa bank secrecy act ant money laundering manual

**Preventing Money Laundering and Terrorist Financing, Second Edition** Pierre-Laurent Chatain, Emile van der Does de Willebois, Maud Bökkerink, 2022-08-03 Money laundering and terrorist financing undermine the integrity and stability of financial systems and can have a significantly adverse impact on a jurisdiction's economy Challenges to effective supervision and prevention of money laundering and financing of terrorism were exacerbated in the aftermath of the 2008 financial crisis with financial institutions need for funds at times undermining vigilance as to the provenance of those funds As such supervisors often and prudently focused on coping with the crisis Since 2009 when the first edition of this handbook was published challenges to the integrity and stability of financial systems have continued to evolve Money laundering and terrorist financing risks continue to threaten the reputations of financial institutions and entire financial sectors exposing institutions to the possibility of severe enforcement action by public authorities or the loss of correspondent relationship facilities by their private sector counterparts This second edition reflects the evolving challenges to the integrity and stability of financial systems recent trends in enforcement actions by country authorities and changes to international standards notably an emphasis on a risk based approach This practical handbook supports the implementation of international standards established by the Financial Action Task Force and other bodies Providing examples of money laundering and terrorist financing supervisory frameworks in a range of countries Describing best practices for the supervision and enforcement of money laundering and terrorist financing laws and regulations Offering practical advice on how a particular jurisdiction might incorporate enforcement of the laws and regulations on money laundering and terrorist financing into its supervisory framework Designed specifically for bank supervisors this guide will also be of interest to readers working in the areas of finance corruption prevention law accounting and corporate governance

**Handbook of International Banking** A. W. Mullineux, Victor Murinde, 2003 The Handbook of International Banking provides a clearly accessible source of reference material covering the main developments that reveal how the internationalization and globalization of banking have developed over recent decades to the present and analyses the creation of a new global financial architecture The Handbook is the first of its kind in the area of international banking with contributions from leading specialists in their respective fields often with remarkable experience in academia or professional practice The material is provided mainly in the form of self contained surveys which trace the main developments in a well defined topic together with specific references to journal articles and working papers Some contributions however disseminate new empirical

findings especially where competing paradigms are evaluated The Handbook is divided into four areas of interest The first deals with the globalization of banking and continues on to banking structures and functions The authors then focus on banking risks crises and regulation and finally the evolving international financial architecture Designed to serve as a source of supplementary reading and inspiration the Handbook is suited to a range of courses in banking and finance including post experience and in house programmes for bankers and other financial services practitioners This outstanding volume will become essential reference for policymakers financial practitioners as well as academics and researchers in the field

**Anti-Money Laundering Transaction Monitoring** Bob Walsh, 2015-10-17 This Handbook is a must for all AML compliance professionals Like other AML texts written by Bob Walsh this is a practical quick reference guide with specific information geared for AML professionals This book addresses transaction monitoring as compiled by Bob Walsh from his decades of experience working with some of the largest banks in the world FBI Special Agents the Federal Reserve Bank and leading AML KYC consulting agencies This text focuses heavily on transaction monitoring since that is the area of AML compliance where most regulated companies encounter the greatest exposures complexities and challenges The following subjects are covered Currency transaction reporting CTR processing Structuring of transactions Foreign Corrupt Practices Act requirements Office of Foreign Assets Control OFAC requirements Correspondent relationships Wire transactions Red flag suspicious transactions Transaction monitoring practices Due diligence research and SARs processing *Bank Secrecy Act/ Anti-Money Laundering Examination Manual* Federal Financial Institutions Examination Council, Federal Financial Institutions Examination Council, 2014-12-31 This Federal Financial Institutions Examination Council FFIEC Bank Secrecy Act BSA Anti Money Laundering AML Examination Manual provides guidance to examiners for carrying out BSA AML and Office of Foreign Assets Control OFAC examinations An effective BSA AML compliance program requires sound risk management therefore the manual also provides guidance on identifying and controlling risks associated with money laundering and terrorist financing The manual contains an overview of BSA AML compliance program requirements BSA AML risks and risk management expectations industry sound practices and examination procedures The development of this manual was a collaborative effort of the federal and state banking agencies<sup>1</sup> and the Financial Crimes Enforcement Network FinCEN a bureau of the U S Department of the Treasury to ensure consistency in the application of the BSA AML requirements In addition OFAC assisted in the development of the sections of the manual that relate to OFAC reviews Refer to Appendices A BSA Laws and Regulations B BSA AML Directives and C BSA AML References for guidance

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