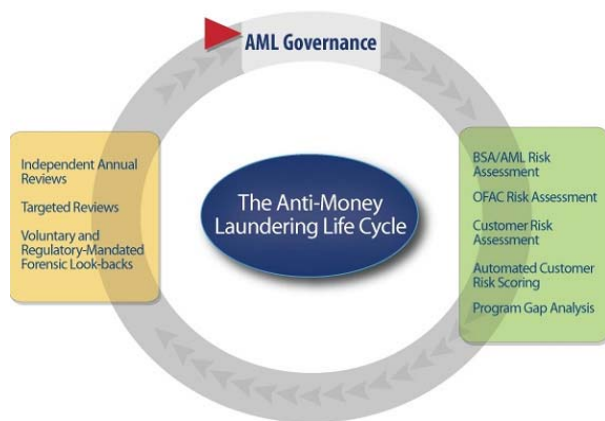


# Anti-Money Laundering Compliance Consulting Services

## Successfully Managing Anti-Money Laundering Compliance Risk

Regulatory efforts to fight money laundering and terrorism are changing the way a financial institution complies with anti-money laundering (AML) and other Bank Secrecy Act (BSA) requirements.

Metavante Risk and Compliance Solutions offers these comprehensive consulting services that help you develop, implement, and maintain AML compliance.



### AML Program Governance

Section 352 of the USA PATRIOT Act sets forth the requirement that financial institutions have a written, Board-approved AML compliance program and a designated BSA/AML compliance officer to oversee the program. Metavante can assist you with establishing best practice governance for AML program: organizational structure, committee charter and membership, AML policies and procedures, internal controls, and workflow. Each of these governance components is customized to match your risk exposure, current staff levels, and how AML compliance fits into your overall enterprise risk management framework.

### BSA/AML Risk Assessment

The BSA/AML Risk Assessment is designed to provide a documented profile of your risk exposure to money laundering and terrorist financing. It is modeled upon the FFIEC Examination Manual that requires institutions to consider the type of customers they service, the products and services offered, and geographical factors related to both the institution and the customer base.

### OFAC Risk Assessment

This process is patterned after the BSA/AML Risk Assessment and utilizes the OFAC Risk Factor Matrix of the FFIEC Examination Manual to determine the institution's exposure to potential OFAC violations.

### Customer Risk Assessment Methodology

In accordance with requirements of 31CFR 103.121 and Section 326 of the USA PATRIOT Act, Metavante develops a customized, quantitative, and qualitative customer risk assessment methodology. The process is documented and where possible, built into an institution's AML system.

### Automated Customer Risk Scoring

Section 326 of the USA PATRIOT Act and 31 CFR 103.121 require financial institutions to perform risk assessments of customers. Through utilization of our Prime Compliance Suite technology, we provide your periodic customer risk scoring. This service is geared toward institutions that are not using the Prime Compliance Suite, but wish to utilize its versatile risk scoring functionality. The Automated Customer Risk Scoring service can be provided in combination with the Customer Risk Assessment Methodology service.



# Anti-Money Laundering Compliance Consulting Services

## Customer Scan

The need to identify OFAC, PEP, or other types of entities is a requirement all financial institutions must comply with. If an institution has not employed a solution that allows for periodic filtering of their customer base, Metavante can help fulfill this requirement. We can filter the institution's customer list against any of 30+ lists annually, semi-annually, or quarterly. By utilizing our expertise in reducing false positives, Metavante will provide a report of customers that matched and the details of the entity.

## BSA/AML Program Gap Analysis

Designed to assess the comprehensiveness of your overall BSA/AML compliance program, identify any gaps, and introduce best practices.

## Annual Independent Review

The Annual Independent Review is a full-scope in-depth review of your BSA/AML program, as required by Section 352 of the USA PATRIOT Act, designed to test compliance with BSA/AML regulations, OFAC regulations, and industry best practices. As a subset, we can conduct a Targeted Review geared toward specific segments of your AML program, such as KYC/CIP and suspicious activity reporting.

## Voluntary and Regulatory-Mandated Forensic Investigations

Money laundering regulations grant regulators the authority to conduct forensic look-backs of your transaction activity when they determine that AML program weaknesses warrant this investigation. We provide detailed documentation of the suspicious flow of funds, and recommendations to remediate the causes for previously unidentified suspicious transactions.

## AML Training

Every financial institution must provide training on anti-money laundering to its employees. This training must be done both shortly after hiring and annually. Metavante can provide this training on a scheduled basis or whenever the demand arises. The program can be customized to your needs and location to optimize the time employees are away from their desk.

## Best Practices Webinars

Knowing about trends and peer practices in the industry is helpful; knowing how to employ them is key to a more effective compliance program. Our Best Practices Webinars are geared toward translating AML trends and evolving practices into techniques that an institution can employ. Sessions are offered periodically and are generally two hours in duration.

## Why Metavante?

Metavante Risk and Compliance practitioners are very different from those at traditional audit and compliance firms. We are seasoned with 20+ years of organizational experience in banking, technology, operations, regulatory compliance, corporate governance, and risk management. We have a strong track record of helping banks advance their risk and compliance programs. We do more than just "audit" your operating areas with a checklist, or restate what management already assumes or knows. Instead, we quickly provide findings, process improvement recommendations, risk mitigation plans, compliance advice, justifications, and feedback – a roadmap for moving forward – based on interviews with your personnel, hands-on review of your risk and compliance practices, and insights from work with peer banks.

To learn more about Metavante solutions for compliance and operational risk management, please call 1-800-822-6758 or visit [metavante.com](http://metavante.com).

