



CERTIFIED COMPLIANCE MANAGER

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SYLLABUS

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Introduction

Chapter I: Customer Onboarding and KYC

- Identification of Individual Accounts
 - Personal Affirmation Document
 - Address
 - Work and Income Information
 - Purpose of Account Opening
 - Authorised Signatories
 - Queries
- Requirements for Identification of Corporate Accounts
- Charities and Non-Profit
 Organisations
- Account Opening for Companies Under Registration
- Embassies and Government Agency Accounts
- Accounts of Minors
- Accounts by Power of Attorney or Bank Authorisations



Identifying the Real Beneficiary of the Account

KYC Customer Identification Form

- First: Customer Information
- Second: Address (Residence Indicator)
- Third: Work and Income Information
- Fourth: Account Management Information
- Fifth: Inquire About Politically Exposed Persons PEP
- Sixth: Telephone Number
- Seventh: Inquiry about (FATCA)
- Eighth: Customer Signature
- Design for a KYC form (Individuals)

Competencies

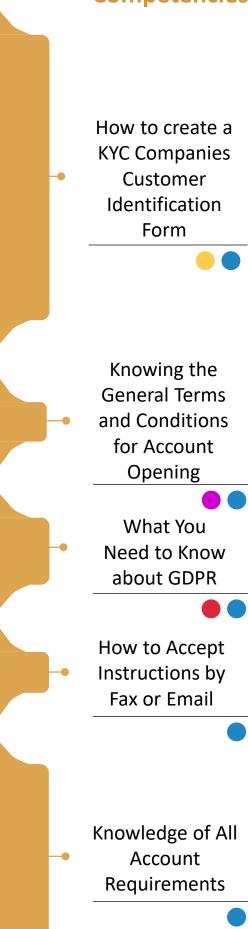
How to Identify the Real Beneficiary of an Account

How to Create a KYC Individual Customer Identification Form

- Know Your Customer Entity Form (Companies)
 - Identifying Owners and Natural Shareholders
 - Identifying the Authorised Signatories of the Company
 - FATCA information on the KYC Form
- KYC Form Design for Companies

General Terms and Conditions

- European Data Protection Act (General Data Protection Regulation - GDPR)
- Accepting Instructions by Fax or Email
- Summary of Account Opening Requirements – Individuals
- Summary of Account Opening Requirements - Entities
- Summary of Account Opening Requirements - Non-Profit Organisations



- FATCA Procedures When Opening an Account
 - W-9 Form
 - W-8BEN Form
 - W-8BEN-E Form
- Opening (Non–Face-to-Face) Accounts
- Incomplete Accounts
- Modifying the Customer Data
- Customer Risk Rating
 - First: Customer Type
 - Second: Geographical Factor
 - Third: Products, Services, and Delivery Channels Factors
- KYC Update
- Online KYC Update

Dormant Accounts





- Account Opening Procedures
 - Opening Accounts, and Activating Them through Branches
 - Activating Accounts through Central Management
 - Best Practices for Account Opening Mechanisms

- Digital Identity and Electronic Know Your Customer (EKYC)
- Digital Identity Highlights
- Digital ID Challenges
- A Proposed Mechanism for Implementing Digital ID
 - ID Verification
 - KYC Information (Identifiers)
 - Name Screening
 - Applicant ML Risk Rating
 - Address Verification
 - Work Verification
 - Signature
 - Periodically Updating the Customer Profile
 - Monitoring Account Transactions

Knowing the Account Opening Procedures

Knowing the Digital Identity Procedures and EKYC

Chapter II: Anti-Money Laundering and Counter-Terrorism Financing

- The Concept of Money Laundering
 - Criminal Offences
 - Financial or Physical Returns from the Original Crime
 - Camouflage and Concealment
 - Knowledge of the Source of Funds
- The Stages of Money Laundering
 - The First Stage: Placement
 - The Second Stage: Layering
 - The Third Stage: Integration
- Terrorist financing
 - The Difference Between Terrorism Financing and Money Laundering
 - Terrorism Financing Indicators (Red Flags)



- Consequences of Money Laundering and Terrorism
 Financing Crimes
 - Encouraging Original Crimes
 - Negative Impact on Financial and Economic Decisions
 - Negative Impact on Legitimate Businesses
 - Negative Effect on the State's and Financial Institution's Reputation
 - Exposure to Fines or Sanctions
- Legal Framework for Money Laundering and Terrorism Financing Crimes

Due Diligence and Customer Identification Requirements Knowing the Consequences of Money Laundering and Terrorism Financing Crimes

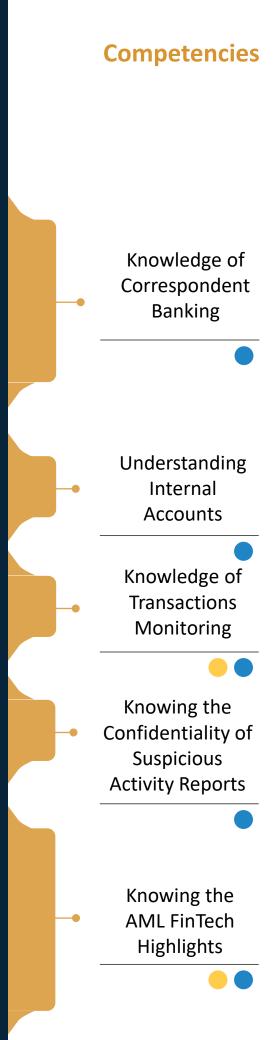
Knowing the Legal Framework for Money Laundering and Terrorism Financing Crimes

> Knowing the Due Diligence and Customer Identification Requirements

- The Most Important Methods of Money Laundering and Financing of Terrorism
 - Cash Deposits
 - Red Flags for Bank Accounts
 - Red Flags for Wire Transfers
 - Red Flags for Safety Deposit Boxes
 - Red Flags for Credit Facilities
 - Trade Financing and Letter of Credit (Import and Export)
 - Red Flags for Electronic Banking Services
 - Red Flags for Customer Behaviour
 - Red Flags for Employee Behaviour
 - Foreign Letter of Guarantee
 - Insurance Companies
 - Fuel Stations, Restaurants and Business Activities with Intensive Cash
 - Casinos
 - Real Estate Trading
 - Shell Companies
 - Virtual Currencies
 - Virtual Assets Red Flag Indicators

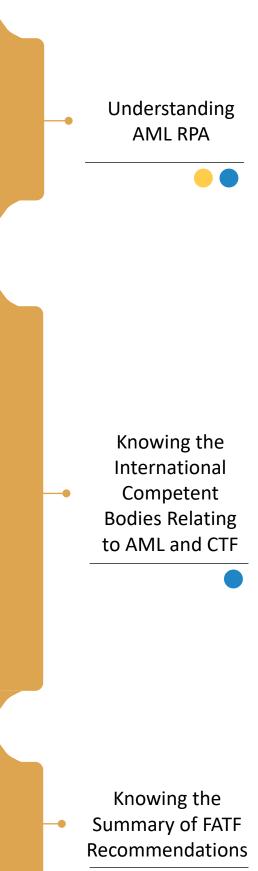
Knowing the Methods of Money Laundering and Financing of Terrorism Chapter III: Advanced AML Investigations

- Introduction
- Correspondent Banking
 - Payable Through Accounts
 PTA
 - Nesting and Down Streaming
- Internal Accounts
- Transactions Monitoring
- Alert Investigations (Case Management)
- Confidentiality of Suspicious Activity Reports
- AML FinTech Highlights
 - Where FinTech and RPA Make More Sense
 - FinTech Benefits/Impact
 - FinTech Challenges



- AML Robotic Process Automation (Case Management)
 - Automated AML Investigation Robotic Processes (Case Management)
- International Competent
 Bodies Relating to Anti-Money
 Laundering and Counter Terrorism Financing
 - FATF Financial Action Task Force
 - Bank for International Settlement - BIS
 - The Wolfsberg Group
 - Egmont Group
 - International Monetary Fund

Summary of FATF Recommendations



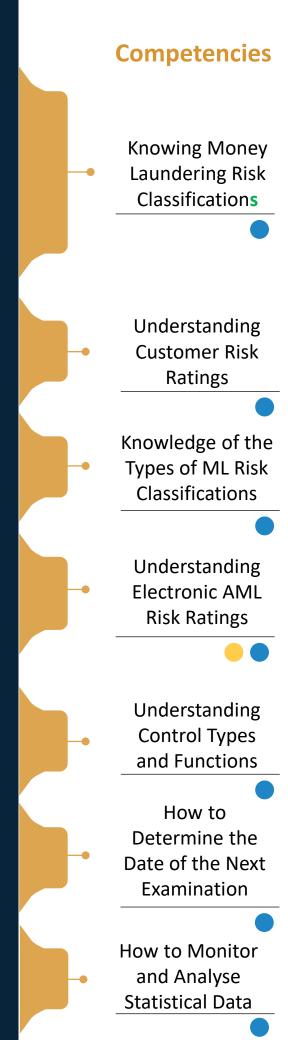


- 5th AML Directive
 - The Main Objective of the 5th AML Directive
 - Changes to Certain Customer Due Diligence Measures
 - Lists of Politically Exposed Persons (PEPs)
 - Clarification of the Measures to be Taken in Relation to Transactions Involving High-Risk Third Countries
 - New Transparency Measures
- Factors for a Successful Compliance and AML Program
 - Independence and Appropriate Location within the Institution's Structure
 - The relationship between Anti-Money Laundering and Regulatory Compliance Functions
 - Qualified Team
 - Automatic Systems and Keeping Abreast of Technological Developments
 - The AML Manager's Mindset and Approach
 - Policies and Procedures
 - Continuous Training and Keeping Abreast of Developments
 - Independent Audit

Knowledge of the 5th AML Directive

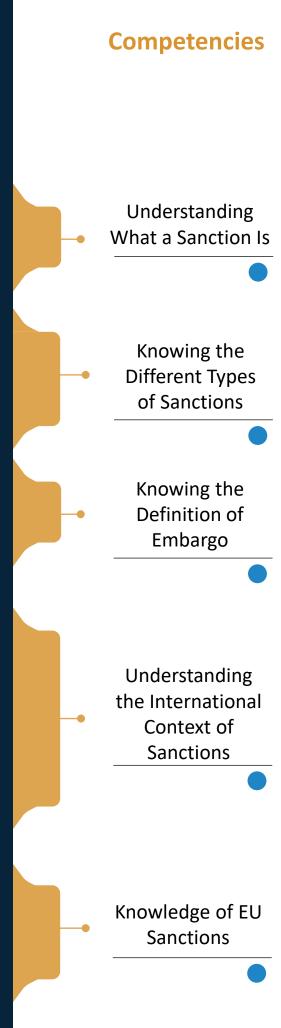
Understanding the Factors for a Successful Compliance Program

- Money Laundering Risk Classification
 - First: Customer Type
 - Second: Geographical Factor
 - Third: Type of Service,
 Product or Delivery Channel
- Customer Risk Rating
- Types of Money Laundering Risk Classification
- Electronic AML Risk Rating
 - Risk Assessment of Correspondent Banks
 - AML Risk-Based Approach
- Control Type & Function
 - Multiple Controls
- Determining the Date of the Next Examination
- Monitoring and Analysing Statistical Data Relating to the Risk Approach



Chapter IV: International Sanctions and Embargoes

- Introduction
- Definition of Sanctions
- Types of Sanctions
 - Comprehensive Sanctions
 - Sectoral Sanctions
 - Targeted Sanctions
- Definition of Embargo
- International Context
 - United Nations
 - Security Council
 - United Nations Security Council (UNSC) Sanctions Regimes
 - Types of UNSC Sanctions
- EU Sanctions
 - EU Thematic Restrictions
 - Ownership and Control as per the EU Sanctions
 - EU Licensing



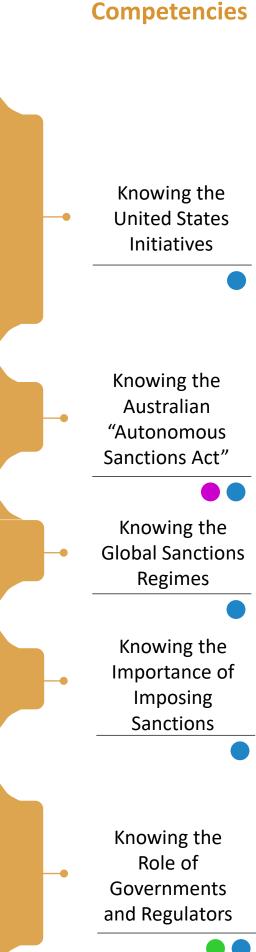
United States Initiatives

- **US Patriot Act** •
- The Office of Foreign Assets • Control (OFAC)
- **OFAC Lists** •
- Who Must Comply with • **OFAC Regulations**
- **OFAC Licence** •

The Australian "Autonomous" Sanctions Act"

Global Sanctions Regimes

- The Importance of Imposing Sanctions
- Role of Governments and Regulators
 - **Foreign Policy** •
 - Import and Export •
 - Regulators •
 - Governments •



Understanding the Role of Financial Institutions

The Role of Financial Institutions

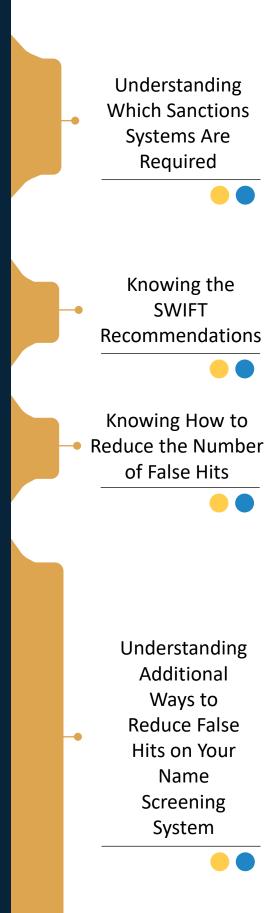
Processes

- Account Opening
- De-Risking Activities
- Banking Authenticated Messages
- Trade Transactions
 - o Credit
 - Swift Integration
 - Documentary Credit Messages
 - Vessel Name
 - Vessel Flag
 - Vessel Picture and Class
 - Vessel Location and Route
 - Ports and Passage
 - Sanctions Violations
 - Ownership
 - Vessel Status
- Other Products and Services
- Dealing with High-Risk Countries

Knowing the Internal Processes to Ensure Sanctions Compliance

> Systems

- Computer Assisted Audit Techniques (CAATs)
- System Internal Lists
- General Sanctions Software Highlights
- SWIFT Recommendations
- Name Screening Algorithms and Reducing the Number of False Hits
- Additional Advice for Reducing False Hits on your Name Screening System
 - Screen the Data against its Category
 - Structured Data Vs. Unstructured
 - List Set
 - List Review
 - Unifying Related Alerts
 - Weak Aliases
 - Heavy and Light Words
 - Machine Learning



Understanding

Violation Reports

Reporting

- Violation Report Structure
- Violation Reports Interpreting the Results
- Sanctions Highlights
 - UN Sanctions on Sudan
 - US Sanctions on Sudan
 - UN Sanctions on Iran
 - US Sanctions on Iran
 - Financial Sector-Related Provisions
 - US Sanctions on Syria
 - Caesar Syria Civilian
 Protection Act
 - Executive Order on Hong Kong Normalization
 - US Sanctions on Cuba

Knowledge of Sanctions

Highlights

Chapter V: Regulatory Compliance Management

Regulators

- The International Context
 - Bank for International Settlements (BIS)
 - Basel Committee on Banking Supervision
 - Wolfsberg Group
 - Federal Reserve System
 - Australian Regulatory Agencies
 - Reserve Bank of Australia (RBA)
 - The Australian Prudential Regulation Authority (APRA)
 - Australian Securities and Investments Commission (ASIC)
 - The Treasury
 - The Organisation for Economic Co-operation and Development (OECD)
 - International Chamber of Commerce
 - European Data Protection Act (General Data Protection Regulation - GDPR)
 - How the Compliance Officer Deals with International and Regional Laws and Organisations

Competencies

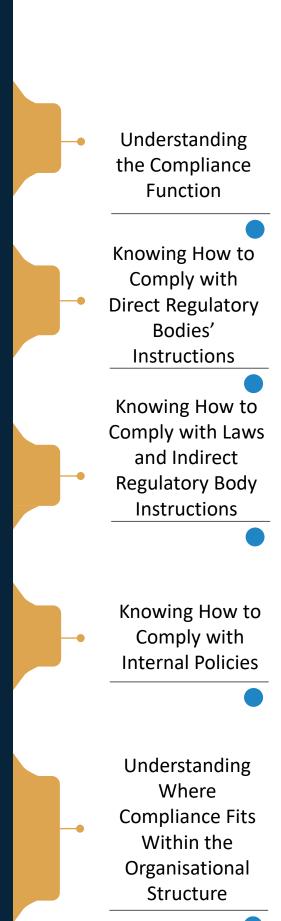
Understanding the Role of the Regulatory Bodies

Understanding the International Context of the Regulatory Bodies

- The Compliance Function within the Financial Institutions (Practical Aspect)
- Compliance with Direct
 Regulatory Bodies' Instructions

Compliance with Laws and Indirect Regulatory Bodies' Instructions

- Compliance with Internal Policies
- Compliance Department Location within the Institution's Organisational Structure



- Relationship of the Compliance
 Department with Other
 Departments within the
 Institution
 - Relationship of the Compliance Department with Internal Audit
 - Relationship of the Compliance Department with the Legal Department
 - Relationship of the Compliance Department with the Risk Department
 - Relationship of the Compliance Department with the Anti-Money Laundering Department
 - Relationship of the Compliance Department with the Chief Executive Officer (CEO)
 - The Relationship of the Compliance Department with the Board of Directors and its Committees

Understanding How the Compliance Department Relates to Other Departments

Understanding How the Organisation Should be Structured

Compliance Policy

- The Scope and Purpose of the Policy
- Determining the Tasks of the Board of Directors
- Determining the Tasks of the Compliance Committee
- Determining the Responsibilities of the Executive Management Team for Monitoring Compliance
- Determining the Tasks and Qualifications of the Compliance Department
- Tasks of the Institution's Staff Regarding Compliance
- Communication with Regulatory Bodies

Compliance Monitoring and Examination Process

- First: Monitoring Simple Requests
- Second: The Monitoring of Periodic Reporting to Regulators
- Third: Compliance Role in Work Procedures and Providing Advice
- Fourth: The Compliance Monitoring of Regulatory Requirements

Understanding How to Create a Compliance Policy

Knowing Compliance Monitoring and Examination Processes





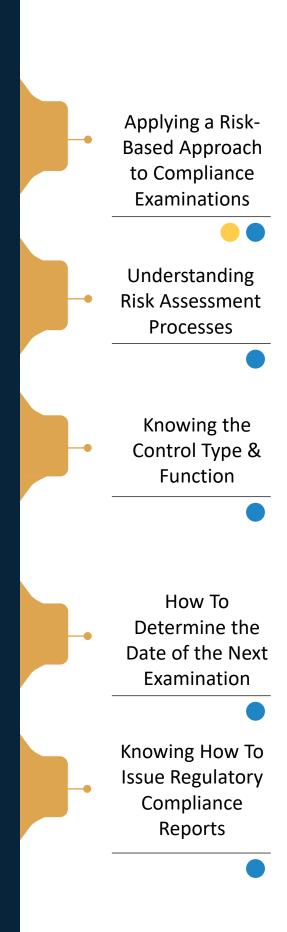
The Risk Assessment Process

Control Type & Function

Multiple Controls

Determining the Date of the Next Examination

 Issuing Regulatory Compliance Reports

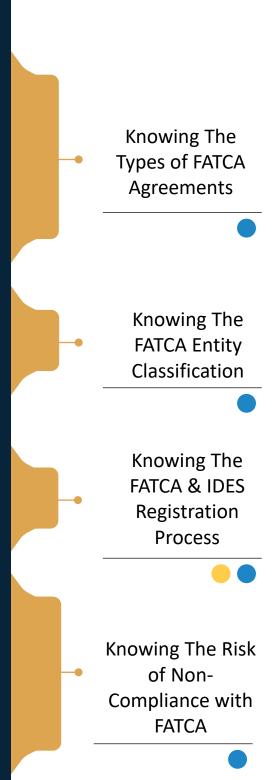


Chapter VI: Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS)

FATCA Introduction

- > Types of FATCA Agreements
 - Type I: Inter-Governmental Agreement– Model 1 IGA
 - Type II: Inter-Governmental Agreement– Model 2 IGA
 - Type III: Foreign Financial Institution (FFI) Agreement
- FATCA Entity Classification
 - Foreign Financial Institutions (FFIs)
 - Non-Financial Foreign Entities (NFFEs)
- FATCA & IDES Registration Process
 - FATCA Online Registration
 - IDES Online Registration
- Risk of Non-Compliance with FATCA
 - Material Breach
 - Event of Default
 - Consequences of Non-Participation of Financial Institutions in FATCA



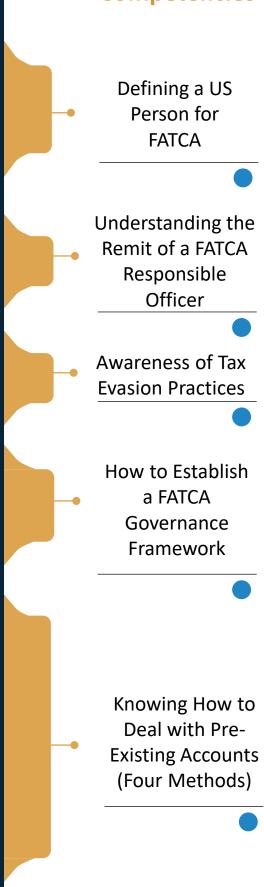


- Definition of a US Person (In Accordance with FATCA)
 - Individuals
 - Companies

FATCA Responsible Officer

Tax Evasion Practices

- Establishing a FATCA
 Governance Framework
- How to Deal with Pre-Existing Accounts (Four Methods)
 - First: "Individual Account" Indicators
 - Second: Corporate Account Indicators
 - Third: High-Value Account Indicators
 - Fourth: Accounts of Financial Institutions



 Documents Required for Accounts Subject to FATCA Law

- Form W-8BEN
- Form W-9
- Form W-8BEN-E

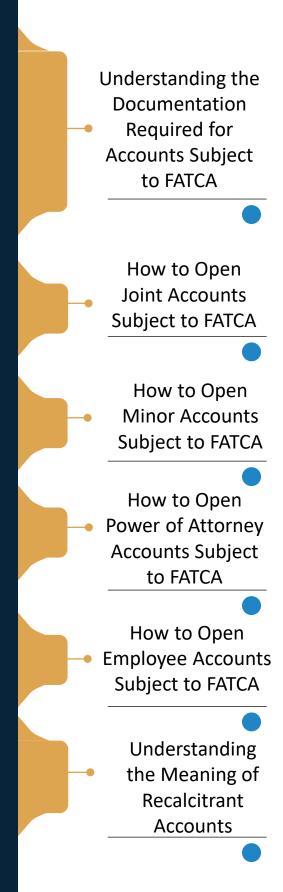
Joint Accounts

Minors Accounts

Power of Attorney

Employee Accounts

Recalcitrant Accounts



- Annual Reporting
 - ONE: Reporting Entity Information
 - TWO: Accounts Reporting
 - THREE: Shareholder Reporting
 - FOUR: Payments Reporting
 - FIVE: Recalcitrant Accounts Pooled Reporting
- Reporting Additional Information
 - Pooled Reporting
 - Reporting of Closed Accounts
 - Nil Reporting
 - Schema Requirement
- Process for Preparing and Transmitting XML Files
 - Schema Validation
 - Sender Metadata
 - IDES Gateway
 - The Most Important Advice when Preparing FATCA Reports
- Common Reporting Standard (CRS)
 - Background
 - CRS Activities
 - Taxation
 - Due Diligence
 - FATCA IGA/CRS Comparisons

Core



Competency Types:

Technical

Functional

