



cutting through complexity

AML Conference 2014

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Global - KPMG - Research - Global Anti-Money Laundering Survey 2014

Global Anti-Money Laundering Survey 2014

Anti-Money Laundering (AML) has never been higher on senior management's agenda, with regulatory fines now running into billions of dollars, and regulatory action becoming genuinely license threatening.



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 [Global Anti-Money Laundering Survey 2014 \(PDF 2.84 MB\)](#)

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Financial institutions are making significant changes in response to regulatory action and increasingly far-reaching global AML regulations; with numerous new regulations across Asia, and the US Foreign Account Tax Compliance Act (FATCA) having an impact; and the Fourth European Money Laundering Directive (4MLD) still to come.

These initiatives have quickly changed the AML scene from a standalone function under compliance, to an increasingly complex and overarching function cutting across legal, risk, operations and tax. Strong AML processes and controls are at the heart of interdependencies and linkages within a global organization, offering invaluable client knowledge that is only recently starting to be leveraged by other departments as well as senior management.

The *Global Anti-Money Laundering Survey 2014* highlights that AML initiatives are becoming increasingly interconnected across operations and jurisdictions as a result of a demanding and continuously evolving regulatory landscape.

The survey compares firms' AML programs and looks at emerging areas of risk, such as Trade Finance and Tax Evasion, as well as AML trends within the Insurance and Asset Management sectors.

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Key Survey Findings

Senior management focus on the rise

Cost of compliance continues to be underestimated

Training and recruitment require a globally consistent approach

Outsourcing and off-shoring are growing trends

Transaction monitoring costs continue to soar as satisfaction declines

Know Your Customer continues to be the focus of regulators

Politically Exposed Persons continue to leave Organizations exposed

Sanctions compliance shows sign of improvement, but still a sore spot

Regulatory approach is fragmented and inconsistent

Global Anti-Money Laundering Survey 2014

How is the Financial Services industry rising to today's global anti-money laundering challenges?



<http://www.kpmg.com/global/en/issuesandinsights/articlespublications/global-anti-money-laundering-survey/pages/default.aspx>

平成25 事務年度 金融モニタリング基本方針

- マネロン防止（FATF、G8 等の国際的な動向を踏まえ）反社会的勢力への**経営陣の考え方**
- 疑わしい取引の届出：抽出**システムの実効性**、届出状況のモニタリング
- **水平的レビュー**
- 金融機関における「**コンプラ疲れ**」への対応

反社等の問題を踏まえた今後の検査

- 反社等対応についての横断的な検証（**水平的レビュー**）の実施
- 金融機関のビジネス動向の把握（とりわけ**新規業務**や金融機関が重点的に販売する商品・サービス）
- 各金融機関の**業務やリスクに関する事前の検証**を強化し、**リスクの高いと思われる業務に焦点**を当て、深度ある効果的な検査を実施
- 事実関係の精査に留まらず、問題の根本原因（とりわけ**経営陣の認識**やガバナンス上の**問題の有無**）に遡った検証を実施
- 反社・マネロン専門チームの創設

反社会的勢力との関係遮断に向けた取組みの推進

- 反社等暴力団**排除条項**の導入の徹底
- **反社データベース**の充実・強化
- 反社との関係遮断に係る**内部管理態勢**の徹底

Being aware of the risks incurred by banks of being used, intentionally or unintentionally, for criminal activities, the Basel Committee on Banking Supervision is issuing these guidelines to describe how banks should include money laundering (ML) and financing of terrorism (FT) risks within their overall risk management.

銀行自身が悪意のあるなしにかかわらず犯罪行為に利用されるリスクに鑑み、バーゼル銀行監督委員会は、銀行がいかに資金洗浄およびテロ資金供与のリスクを全行的なリスク管理に組み込むべきかについてのガイドラインを公表した。



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