

15th Annual International Anti-Money Laundering Conference

March 15-17, 2010 | The Westin Diplomat | Hollywood, Florida

Concurrent Session: AML Compliance Risk-Based Approach to an Economic Sanctions Program Monday March 15, 2010 1.30 – 2.45 pm

REVIEW POINTS

- **Conduct a comprehensive Risk Analysis (Assessment) against applicable economic sanction requirements**
 - All of Company's transactions
 - Existing and potential relationships
 - Existing and new products/services offered by Company
- **Identify – Target Sanction-specific Training**
 - Business/operations areas that have economic sanctions obligations
 - All necessary employees within the business/operation areas
 - Senior Management/Board of Directors
- **Screen - Resolve – Escalate - Report**
 - Screen all relevant parties - Existing/prospective customers, employees, contractors, pensioners, shareholders, business partners, beneficial owners, beneficiaries of EFT/trade financing, and potential merger and acquisition targets
 - Document the Screening – Resolution of matches --Escalation/Reporting of Matches
- **Monitor – Review – Test -- Report on effectiveness of Company's Economic Sanctions Compliance Program (“Program”)**
- **Communicate – Include in Company's Program**
 - Company's Foreign brokers and Clients
 - Third parties performing services on Company's behalf