

# **Anti-Money Laundering**

Responding to the challenge of regulatory transformation, our team is focused on compliance with AML regulation, offering you customized solutions



## A new era for AML/CFT Compliance Assessment

The European Union has adopted robust legislation in the area of AML/CFT including improvements in the cooperation and exchange of information between anti-money laundering supervisors, increased transparency with regard to the ultimate beneficial owners of companies, increased regulatory requirements for virtual currencies and extension of criminal liability of legal entities. At the same time, increased AML/CFT risk associated with the Covid-19 pandemic has posed challenges and pressure on entities' compliance practices. Regulators have encouraged financial institutions to make appropriate use of technology such as contactless payments and digital onboarding in response to the pandemic while mitigating AML/CFT risks.

### A glance of the legal framework of AML is presented below:



## EU Directives & Regulations

- AML IV Directive transposed into Greek Law through 4557/2018
- AML V Directive to be transposed by Member States by 10.01.2020
- AML VI Directive to be transposed by 03.12.2020

### International and Eu best practices

- Law 4557/2018 already in force
- Decision No. 24963/2020 for the implementation of the National Public Central Registry of beneficial owners (National Gazzette 661/28.02.2020)
- FATF Report on covid-19-related Money Laundering and Terrorist Financing Risks and Policy Responses

### **Domestic Legislation**

- EBA's Guidelines on risk factors
- Recommendations and Guidance for a risk-based approach

## **Supervisory Focus**

Addressing AML/CFT compliance risks will remain a key priority for financial services institutions since supervisory scrutiny is expected to increase significantly.

#### **EBA/European Commission**

The EBA has a new reinforced role in AML supervision in the financial sector. It has taken a leading, coordinating and monitoring role in promoting integrity, transparency and security in the financial system.

The Commission has published an Action Plan, which will be enforced over the next 12 months. Among the initiatives, the Commission will propose harmonised rules and the set up of an EU-level supervisor in the first quarter of 2021.

#### SSM approach

The SSM is focusing on combating AML/CFT risks in the banking sector as part of the prudential supervisory process and in particular:

- as part of ongoing supervision processes when conducting assessments of the suitability of members of the management body; and
- in the context of the supervisory review and evaluation process as part of the review of risks, business models, credit operations, governance and internal risk management

#### **Local supervisors**

Local supervisors are expected to follow the EU supervisory practices in the area of AML/CFT by shifting their focus and resources into assessing the adequacy of policies, procedures and internal controls adopted by supervised entities.

Bank of Greece and the Hellenic Capital Market Commission are expected to exercise their supervisory powers through on-site inspections and to increase their co-operation with the Greek Financial Intelligence Unit.

## Helping you meet the AML regulatory requirements

Understanding that regulatory transformation with regard to AML/CFT is on top of your agendas, we have built an efficient and effective regulatory compliance solution to help you ensure that your business is compliant to new AML laws and regulation.

#### **Proactive Solutions**

Our services cover four main pillars but can be further customized according to your Firms specifications, operations and needs.

### Readiness assessment

Gap Analysis on existing AML/ CFT framework and readiness assessment for AMLD IV & AMLD V

Review of your AML risk assessment methodology & model

Benchmark your compliance arrangements against best practices suggest areas for improvement

Review of your AML/CFT compliance program

## KYC process improvement

Review KYC documentation, propose actions for automation, simplicity and completeness

Holistic assessment of on-boarding procedures under (i.e. FATCA, CRS, QI, AML, DAC 2)

Organize AML/CFT training programs for your executives focusing on practical implications

Ad hoc BoD/Audit Committee education

## Implementation of AML procedures

Policy formulation and updates. Remediation services for customers, data accuracy and files completeness

Regular risk assessment exercises supported by documented methodology and procedures

Ad hoc risk-based categorization of specific clients

Co-sourcing/outsourcing of internal audit services on AML issues

## Monitoring on-going compliance

AML/CFT Programme development following a risk-based approach

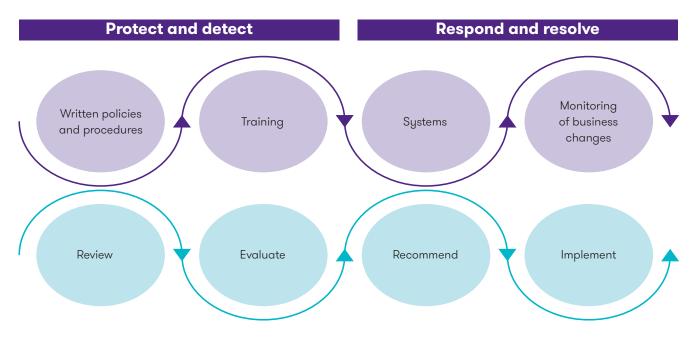
Evaluation of the design and effectiveness of your compliance monitoring programme

Provision of periodic compliance reports to Audit Committee / BoD / Regulators

Perform independent reviews required by regulatory frameworks

Our solutions may include among others, a comprehensive cloud software suite to elaborate on AML risk assessment, as well as a training platform with user friendly modules and practical examples on the applicability of the AML/CFT framework and other EU regulations.

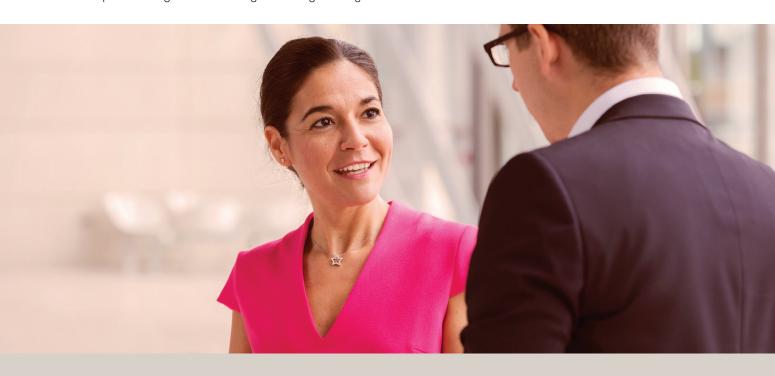
## A snapshot of our approach



### What defines our unparalleled edge

- ② Grant Thornton has established a specific Financial Services Department which combines expertise from all Assurance, Advisory and Tax Business Lines. This Department consists of over 150 dedicated, well trained and experienced executives who provide services to several Institutions in Financial Sector.
- ② Our people make the biggest difference: Our team consists of people with diverse background and includes subject matter experts that have extensive experience in delivering Regulatory Compliance services.
- @ Grant Thornton has carried out a number of Regulatory Compliance assignments enabling us to bring industry

- insight and knowledge of best practices in relation to the new AML/CFT requirements.
- Our client portfolio includes, among others, most of the Regulators of the Financial Sector, all Systemic Greek Banks, most of the Bad Banks' Liquidators and International Investment Funds.
- We have a strong presence and influence within the market to ensure that the challenges that our clients face are being represented. We are valued for our deep technical expertise and insights into the banking sector and its regulatory landscape.



## **Contact details**



**Katerina Stefanidou**Partner, Financial Services

T +30 210 7280 000 E katerina.stefanidou@gr.gt.com



**Konstantinos Noulas**Director, Financial Services

T +30 210 7280 000 E konstantinos.noulas@gr.gt.com



 $\ensuremath{\texttt{©}}$  2021 Grant Thornton. All rights reserved.

Grant Thornton Greece is a member firm of Grant Thornton International Limited (GTIL). GTIL and the member firms are not a worldwide partnership. Services are delivered by the member firms. GTIL and its member firms are not agents of, and do not obligate, one another and are not liable for one another's acts or omissions. Please see www.grant-thornton.gr for further details.