



FINTRAIL

Digital AFC support

As a tech first company we have always looked to use technology to serve our clients in the best possible way. Our clients continue to rely on our robust remote working infrastructure and expertise. Here are just some of the examples of how we are conducting our anti-financial crime (AFC) services fully remotely with the same personalised approach and without compromising on the quality of the output.

Audits

- **What:** Comprehensive tailored evaluations of your AFC framework not only for compliance with regulatory requirements, but also to secure necessary partnerships including those with Banks.
- **How:** We are able to conduct all meetings virtually* with frequent milestone status updates. All documentation can be securely submitted for remote assessment and file / transactional reviews can be done virtually alongside an analyst.

Our outcomes focused audits provide:

- a granular understanding of your AML control framework;
- a qualitative and quantitative detailed assessment of the adequacy of your controls in mitigating the bespoke risks and typologies faced by your business;
- a clear understanding of critical and material risk exposure allowing for meaningful decisions on prioritisation, resources and costs;
- proportionate and pragmatic recommendations based on global experience of regulatory requirements and also industry best practices;
- a comprehensive report that be used to drive Board level discussions.

Virtual client debrief to finalise exact scoping requirements, including sample sizes for file review.

FINTRAIL's Data Privacy and cyber security protocols shared.

Document request submitted.
Files received to be stored on a secure central drive with restricted access.

Virtual interviews to be conducted.

Comprehensive draft report produced and shared with stakeholders.
Virtual meeting held to solicit comments and to finalise report.

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Scoping requirements documented including milestone deliverable dates and weekly virtual and email status updates

Remote file review to commence. This includes:

- Policies and Procedures:
- Governance framework including team structure(s) and committee minutes
- Transaction monitoring and sanctions screening rules

Remote sample file / alert review. Analyst / other to walk through the documents and detail the approach taken. FINTRAIL to use internal criteria to assess quality.

Virtual includes Google Hangouts, Zoom, Skype, Microsoft Meet. We will endeavour to use the platform preferred by the client.

Health Check

- **What:** A review of your AFC framework or even particular components is invaluable in identifying and / or preventing material and costly breaches in the future. As many organisations have moved to remote working, now is an ideal time to stress test your AFC business continuity plan
- **How:** Much like our audits, we are able to conduct all meetings virtually and obtain all documentation for the assessment to be completed remotely.

Our unique health checks are designed to:

- leverage our global experience and internal methodology to fully stress test the adequacy of components of your AML programme against international and industry best practices;
- provide recommendations designed to allow for quick decision making and to be immediately impactful.

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Training

- **What:** Structured training to meet the exact needs of your team. Whether its KYC analysts, MLRO's or even your Board, we have extensive experience creating and delivering bespoke training globally.
- **How:** We are fully set up to to design and deliver tailored AFC training modules virtually for up to 100 people in each session. These sessions are interactive and provide the audience with the necessary detail and tools.

Our training will include:

- unique insights based on our breath of industry expertise;
- up to date and real life case studies, to ensure a deeper understanding of the topic and how it relates to the individual attendees;
- allow attendees to better understand the unique financial crime typologies faced by their business and their role in mitigating risk exposure

Virtual client debrief to finalise exact scoping requirements.

FINTRAIL's Data Privacy and cyber security protocols shared.

Draft content shared with client to obtain feedback.

Virtual meeting arranged to discuss commentary and finalise content

Virtual training session held. Each session no more than 2 hours essch to ensure effectiveness of the virtual session.

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Drafting on content including up to date and relevant case studies

Invite for virtual training session sent.

Formalised register of attendees and content shared for future audit and / or regulatory review purposes.



The insight and guidance that Fintrail have provided Monzo over the last 4 years has been indispensable. Recently, the support building out our onboarding flow, CDD procedures and TM programme for business banking was innovative, provided regulatory insight, and ensured we remained compliant.

Monzo



We were impressed with the dynamic approach FINTRAIL brought to reviewing and revising our customer due diligence and customer risk assessment methodologies. The assistance they provided in terms of interpreting regulations and sharing best practices was very insightful and helpful. They ensured that our approach was both regulatorily compliant and innovative. We would be confident to use FINTRAIL again on future projects.

NuBank