Independent assessment of anti-money laundering control effectiveness across the end-to-end framework

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AML independent assessment

Financial institutions face increasing regulatory scrutiny over AML/CFT frameworks, requiring robust governance, effective controls and demonstrable outcomes. A structured independent assessment provides a holistic view of control effectiveness, identifies gaps and supports remediation prioritization. We adopt a structured, risk-based methodology focused on both design and operating effectiveness.

Our high-level approach

Policies & procedures review

- Assess alignment with regulatory requirements and industry practices
- Evaluate clarity, completeness and consistency across AML framework
- Identify design gaps and areas for enhancement

Process walkthroughs

- Conduct broad walkthroughs of key AML processes
- Validate roles, responsibilities and control execution
- Assess system enablement and workflow effectiveness

Sample testing

- Perform sample testing across key control areas
- Evaluate consistency and quality of control execution
- Identify control weaknesses and process deviations

Findings & reporting

- Document clear and structured observations
- Benchmark findings against regulatory expectations and leading practices
- Propose actionable and prioritized recommendations

Key assessment areas

Governance and oversight	Customer risk assessment (CRA)	Transaction monitoring (TM) and suspicious transaction reporting (STR)	Wire transfer or remittance
Institutional ML/TF risk assessment (IRA)	Customer due diligence (CDD)	Financial sanctions compliance	Staff awareness and training

Why financial institutions should act now?

- Demonstrate robust AML control effectiveness in line with evolving regulatory expectations
- Improve governance and consistency across broad AML processes
- Identify control gaps and emerging risks early, reducing regulatory and remediation exposure
- Strengthen audit and regulatory readiness through independent validation

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