

ISLE OF MAN FINANCIAL SERVICES AUTHORITY ANNOUNCES AML/CFT THEMATIC FOR TCSP SECTOR

WHAT DO I NEED TO KNOW?

In the week before Christmas last year, the FSA published a notice of its upcoming thematic project on AML/CFT within the TCSP sector. The project is planned to run during 2023 and beyond.

Undertaken by the AML/CFT Division, the focus of the project will be on, as yet, unspecified elements of the AML and CFT Code 2019 ('the Code') with the aim of providing to the FSA a better overview of the Island's mix of TCSPs in size, complexity and international reach. The project will build upon the work undertaken by the FSA further to its recent foreign PEP thematic project and will add to its wider understanding of AML/CFT risk.

The Head of the FSA's AML/CFT Division has said that the project offers an opportunity to test and evidence how the sector, highlighted in the NRA as one of the highest risk sectors, is meeting its AML/CFT challenges. It is envisaged the exercise will reveal and highlight best practice which will, in turn, be shared with industry.

Oben Regulatory (IOM) Limited is a limited liability company, registered in the Isle of Man under number 0134567C, with its registered office and principal place of business at Queen Victoria House, Victoria Street, Douglas, Isle of Man, IM1 2LF.

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WHAT SHOULD YOU BE CONSIDERING?

Are you fully up to date with your knowledge and understanding of the content of the key documentation published by the FSA (the AML/CFT Handbook, the TCSP Sector Guidance - as well as the Code)?

When were your business's core risk assessment documents - Business Risk, Technology Risk and Customer Risk - last reviewed and updated? Do they take account of all current risks and adequately demonstrate the mitigating controls in place?

Is your client portfolio risk assessment adequately reviewed and in line with your stated periodic review policy? Has the distribution of and justification for the client risk classifications been recently independently reviewed and assessed in line with industry specific risk indicators and in line with the Code?

Do you hold sufficient due diligence in accordance with Part 4 of the Code, and in line with Chapter 3 of the Handbook's guidance, to support your client on-boarding decisions and periodic risk reviews? Do you have a compliance monitoring programme that effectively assesses the AML/CFT controls in place and monitors adherence to your business's overarching compliance policy?

HOW CAN OBEN HELP?

We have a depth of experience in assisting businesses with their controls and compliance environments and specifically with AML/CFT matters, including:

- Risk assessments
- Due diligence documentation reviews
- Mapping policies and procedures against regulatory requirements
- Independent CDD assessment for quality and sufficiency purposes
- Independent assessments of ongoing monitoring of client portfolios and underlying transactions

If you would like to discuss this topic further, require assistance in preparing for any request from the FSA, or have any queries about the range of our services and how we may help you, please do not hesitate to contact Steve Billingham or one of our team.



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You can find more about Steve & the team at Oben at www.oben.im

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