

AML Culture

& Effectiveness Assessment



Is your firm's AML culture undermining its compliance?

Why, in robustly regulated environments, do well-regarded financial services businesses continue to suffer compliance failings? The root cause of almost every significant and material AML failure is an insufficiently robust compliance AML culture. Generally, organisations strive to comply with their AML obligations, however Boards need to foster and promote an environment where compliance processes and controls can succeed.

The 'whys' in assessing the effectiveness of an organisation's AML culture are just as important as the 'hows'.

The Jersey Financial Services Commission handbook states, and other regulators globally concur, that 'The Board must consider what barriers (including cultural barriers) exist to prevent the operation of effective systems and controls... to counter money laundering and the financing of terrorism'.

With increased risks of receiving a substantial civil penalty from the Regulator it is now more important than ever that firms assess their AML culture and take steps to ensure it is aligned with their statutory and regulatory obligations. Promoting a healthy AML culture makes sound business sense. As jurisdictions increasingly direct their civil penalties towards directors, compliance staff and senior managers, employees will be seeking out those firms that can demonstrate a healthy AML compliance culture.

Baker Regulatory Services have devised a unique AML Culture & Effectiveness Assessment tool that ultimately provides a Board with a health check on the AML culture within their business and suggestions on how the AML culture could be strengthened further.

"A poor AML culture cannot be fixed solely with systems and controls. Culture comes first."

Barry Faudemer, Chief Executive of Baker Regulatory Services



For more information about our AML Culture & Effectiveness Assessment, please contact:

Barry Faudemer

T: +44 [1534] 719218

M: +44 [7797] 743631

E: barryfaudemer@bakerregulatory.com

www.bakerregulatory.com