



PROXIMAL CONSULTING

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Education, Training and Presentations

The business community has become increasingly aware of the need for on-going training to enable dirty money to be identified by those dealing with it, however in light of the current legal and regulatory requirements for businesses to provide anti-money laundering (AML) training, never has this need been more pressing. How to design and deliver a comprehensive and effective AML training program to staff is a problem faced by all types of businesses today, not just financial institutions and law firms.

Proximal Consulting has extensive experience in designing and delivering AML training courses for all levels of staff in many different types of organizations. Primarily, because of their ongoing need, we have supplied high quality cost effective in-house training to a number of financial institutions and law firms. This training can be achieved either as a stand alone service or as part of our Money Laundering Compliance & Assurance Program.

Every AML training program we design is unique, offering a bespoke solution tailored to address your specific AML needs and requirements. The most important factor when we design a training program is to establish what you are seeking to achieve together with what regulatory or legal requirements you must fulfil. We begin the process by meeting with you to discuss your expectations and goals, addressing general questions and issues such as those listed below:

- Is there a stated AML policy?
- Is there a commitment by your company to install the required AML procedures and controls?
- Has any AML staff training already taken place?
- Are there any AML procedures already in place? Note: These procedures could either be documented or taking place but not written down.
- Is there any other internal information or documents that exist in relation to the subject of AML?

During the initial stages of consultation, it is essential that we gain a true understanding of your company. For this reason we will generally ask you to provide us with an overview of the business, products offered, and working processes together with a copy of any existing training manuals or material you may already have. In addition to the questions listed above, we will also compile points of discussion related to specific money laundering risks faced by your company, based on our preliminary assessment. For example we may consider types of possibilities such as:

- Customers/clients/staff etc. use your company's services to launder funds.
- Your company is infiltrated by criminals who then use the firm's facilities for criminal means.
- Information is available within criminal groups which alerts them to any general or specific weaknesses in your company's systems that can be exploited.
- Criminals target your company because it is a softer target than similar providers.
- Your company's staff may not be aware of money laundering risks and thus, although there may not be any underlying systemic problems, money laundering is taking place but is not identified.



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- Money laundering activities or suspicions may go unnoticed or unreported or, alternatively, are noticed and reported internally but no external report is then made to relevant authorities.

Following our meeting with you, we will prepare a Money Laundering Risk Matrix which will identify:

- Business processes which are subject to AML regulation.
- Specific Money Laundering risks.
- Current AML procedures (if they exist).
- Evaluations as to how current procedures satisfy AML regulations.
- Suggested new procedures for discussion and approval to satisfy AML regulations.

At this stage, we will also prepare a draft procedures manual for approval and any additional training material you require. We are able to deliver a wide range of training techniques and materials, including:

- In-house training to relevant staff.
- AML training video/DVDs and hand-outs.
- Written training material such as manuals, guide cards and procedure charts.
- Money laundering prevention videos.
- Computer Based Training.
- At desk training via corporate intranets.

Finally subject to your approval and agreement, we will deliver your tailor-made AML procedures manual and AML training material. We are able, if required, to present relevant initial AML training sessions to your company staff ourselves, then act as a mentor to a selected member of your staff so that he/she can physically present future AML training workshops. The training material that we prepare will include required topics and modules specific to your company and may include:

- What is money laundering?
- The law relating to money laundering.
- The legal responsibilities of staff in relation to AML.
- The potential effects on your company, its employees and customers for any breaches of law.
- Red flags relating to customers/clients/transactions/accounts etc.
- Know Your Customer (KYC) procedures.
- Record keeping procedures.



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Remember, every AML training program we design is tailored to meet your specific needs and requirements and will not necessarily follow the process outlined above, however we hope this information will demonstrate how our expertise can help your company design and deliver an effective AML program training.

We are committed to providing you with ongoing support and consulting services after AML training to enable you to effectively deal with the real problems you encounter on a day to day basis. Our due diligence reports, KYC checks and country reports can provide you with the vital tools you need to ensure your AML training is applied effectively and that you meet your company's specific legal and regulatory requirements. For an informative and occasionally entertaining look at world news related to money laundering and business crime, you may wish to sign up for a free copy of the Proximal Review, a new bi-monthly publication produced by Proximal Consulting.

We also arrange and run a variety of external courses and seminars on a variety of topics associated with money laundering. You can book Peter Lilley as a speaker at your commercial or organization's event and benefit from his proven and highly regarded anti-money laundering and business crime prevention expertise. Amongst the subjects or issues that Peter Lilley speaks on are:

- Dirty Dealing – a more “light hearted” presentation drawing from “war stories” contained in “Dirty Dealing” and similar new material.
- Money laundering and anti-money laundering topics including current money laundering trends and events, the effectiveness of AML regulations and controls, how to install and implement an AML regime, money laundering and AML issues relating to online payment processors and new financial delivery mechanisms (such as stored value cards), why it is suicidal for an organization to ignore AML issues.
- Know your customer issues including how to create a KYC due diligence policy, the importance of KYC background investigations, KYC checks on high net worth individuals and Politically Exposed Persons (PEPs), AML and KYC issues in private banks and trust companies.
- Business crime topics including corporate fraud prevention, internal fraud controls, procurement fraud, mortgage fraud, fraud opportunities in online payment mechanisms.
- Hi-tech crime.
- How an organization can respond to, and learn from, a major money laundering or business crime event.

Examples of some of the comments made by delegates about presentations made by Peter are as follows:

"An excellent and relaxed speaker, very enjoyable - a hard act to follow"..
-Due Diligence Conference attendee



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"Of the eight speakers he was the star...."
-Council of Mortgage Lenders Fraud Prevention Conference

"Interesting and entertaining...a good deal more fun than most of our more academic (i.e. dry as dust) legal topics!"
-London Law Firm

"Peter Lilley again"
-Mortgage Fraud Prevention Conference attendee when asked for suggestions on future speakers

For more information, to arrange an initial consultative meeting or if you would like to book Peter Lilley for your event, please contact us.

Proximal Consulting

2 Pelham Court, London Road, Marlborough, Wiltshire, SN8 2AG

Rue Du Rhone 14, 1204 Geneva, Switzerland

Phone: +44(0)1672 516725

Fax: +44 (0)1672 516759

Email: enq@proximalconsulting.com