



Financial Crime Compliance

OUR SERVICES IN EMEA



FTI Consulting's Financial Crime Compliance Services

FTI Consulting's Financial Crime Compliance Team

We are one of the largest financial consulting firms in the world with a long-term successful delivery dating back to 1982 with an outstanding team of 6,400 staff across offices in 29 countries in the majority of key geographies around the world.

We have a global financial crime team and have delivered over 1000 assignments in the past few years alone. We work across the spectrum of financial crime and have recently supported clients in AML, CTF, sanctions, fraud, ABC, market abuse, tax evasion, human trafficking and proliferation of prohibited weapons.

We are proud to bring a full-service financial crime consulting offering with services spanning everything from specialist advisory support, hands-on implementation of complex technologies, to complex investigations.

In Financial Services alone, our clients include seven of the world's ten largest banks, many of the largest asset managers and almost every major payment provider. In addition, we are one of the leading suppliers of financial crime consulting services to many regulators, law enforcement agencies and security services – giving us unparalleled insight into regulatory expectations, industry trends and the overall financial crime ecosystem.

1000+

We have a global team of over **1000** Financial Crime experts, including world-leading experts in AML/CFT, Sanctions, ABC, Fraud and more.

Financial Crime – FTI Consulting's Solutions



Delivering best practice compliance and risk management



Leveraging cutting edge technology against financial crime



Building systemic responses to Economic Crime

What makes us different?

We take an expert-led pragmatic approach towards creating innovative and bespoke financial crime solutions to our clients. We make it our prime objective to understand the root cause of your organisation's concerns and design the right tools for you by leveraging technology, analytics as well as our vast experience working with regulators around the world. We blend our industry expertise and consulting expertise to develop future-proof, cost-effective and compliant solutions. We facilitate knowledge transfer upon each project to support your organisation's transition into a more sustainable infrastructure.

Genuine Financial Crime Insights

We draw together FTI Consulting's experiences from a variety of different sources including public and private sectors, regulators and expert industry bodies, to deliver innovative, pragmatic, and effective solutions tailored to our clients' needs. This means that we bring in the unparalleled industry insights from across the financial crime universe to help you address your organisation's specific needs.

World-Leading Expertise Across New Technologies in Financial Crime

Our team have led the most prominent global studies into new technologies in Financial Crime, granting us unparalleled insight into industry trends. Our team spans experts in virtual assets and cryptocurrencies, technology-enabled fraud typologies and more. In addition, our leading technology teams (including a dedicated Financial Crime data & analytics team) support client in building innovative solutions to critical problems.

Unparalleled Ecosystem-Wide Expertise

We are the only team to have supported or led the design of multiple public-private partnerships and industry utilities in the Financial Crime space – including commercially driven utilities, multi-party responses to particular crises, and building strategic solutions to economic crime on a national scale.



We constantly deliver quality outputs on complex issues and multi-faceted assignments, to which we bring a wide range of skills with local language capabilities when needed and work across segments in a collaborative and efficient manner. We provide pragmatic solutions and stand alongside our clients for delivery – we don't simply write reports.



We continuously revisit our existing solutions and apply outside-of-the-box thinking towards more forward-looking perspectives. For this purpose, we engage with the various internal capabilities to create new approaches to governance, financial crime risk advisory, technological risk assessment tools and regulatory challenges.



We believe that collaboration and data-sharing are the only ways to combat globally established economic crime organisations – and work tirelessly across the globe to support geographies and supranational bodies in responding to increasingly sophisticated threats. Our role as specialist advisors is to enable best practice, trends and intelligence to be shared across sectors and geographies wherever possible.



1. Delivering Best Practice Compliance and Risk Management

Each year, private and public institutions invest billions in countering the increasingly sophisticated threat of financial crime. Our services reflect specialist, expert-led advice on the industry's most complex problems.

Providing specialist advisory services

Drawing from deep subject-matter expertise across the end-to-end financial crime ecosystem, we have a team of genuine experts with unrivalled insights into financial crime industry best practice.

We work collaboratively and in partnership with institutions of all sizes to advise them on their most complex financial crime issues and embed our best practice insights into their organisation.

Some of our recent work includes:

- Delivering end-to-end financial crime framework assessments
- Defining financial crime policy and standards
- Designing financial crime target operating models and three lines of defense – including specialist operating models across every element of Financial Crime
- Designing and delivering financial crime training
- Designing and embedding financial crime quality assurance frameworks
- Delivering financial crime strategic communications and crisis management
- Regulator intermediation and inspection support
- Financial Crime operations optimisation
- Designing intelligence and investigations functions
- Crisis and strategic communications

Giving assurance on the most critical activities

Given the constantly changing and heavily scrutinised nature of financial crime regulation, institutions are increasingly seeking out independent expert opinion and validation on aspects of their financial crime prevention activities.

We take a highly pragmatic approach to our financial crime assurance work – we avoid gold plating and make tangible recommendations that work in practice, not just theory.

Some of our recent work includes:

- Delivering financial crime capability assessments
- Validating transaction monitoring engines in totality – including data flows, rules, and customer segmentation.
- Providing delivery and implementation assurance across your most critical Financial Crime change programmes
- Supporting with preparation for regulator inspection, including preparing for Skilled Person Reviews
- Delivering KYC file sample testing
- Acting as expert witnesses

Supporting the world's largest and most complex investigations and remediations

Our team have supported some of the world's largest, most complex financial crime issues that demand intricate solutions.

We take a holistic approach with a razor-sharp focus on financial crime risk and outcomes, not process.

We work quickly to unearth facts and data sets to enable timely and strategic decisions in investigations and remediation activities across a range of financial crime topics.

Some of our recent work includes:

- Delivering Skilled Person Reviews
- Performing outsourced financial crime investigations and forensic reviews – including many of the most prominent investigations delivered globally.
- Optimising and delivering large-scale KYC and transaction monitoring remediation
- Performing transactional analysis and lookbacks
- Delivering data-driven fraud investigations, including COVID-19 fraud
- Providing financial crime litigation support

CASE STUDIES BEST PRACTICE COMPLIANCE AND RISK MANAGEMENT

End-to-end assessment of global financial crime framework for one of the largest asset managers

Following a number of high profile mergers and acquisitions, this global asset manager required an end-to-end assessment of their financial crime framework covering five discrete business lines and over 50 jurisdictions.

Our team led the review of a framework that was highly fragmented which consisted of multiple operating models, systems and controls covering the various underlying business units.

Key highlights:

- Our team conducted a truly global review across 8 business lines in over 50 countries
- We worked in close collaboration with the firm to ensure they fully understood all elements of the assessment and the root cause of major findings
- We provided tangible recommendations that were extremely well received and formed the foundation of the firm's financial crime transformation agenda
- We were asked to actively support the firm with regulator engagement on both the findings and remediation plan

AML policy and standards definition for a tier one global bank

This tier one global bank had a fragmented and inconsistent suite of AML policy and standards documentation that consisted of 500+ guidance documents. Furthermore, the policy and standards were found to be non-compliant in the majority of in-scope jurisdictions and the firm were facing intense pressure from multiple global regulators to address these gaps.

Key highlights:

- We consolidated 500+ documents into a single policy and two standards documents (covering individuals and entities)
- We worked with the firm to design business-line specific standard operating procedures and working instructions
- We supported with the communication and implementation effort to ensure the new guidance was both understood and embedded – this covered 4 business lines and 25 countries



Large-scale investigations support of a major Nordic bank

One of the largest and most prominent banks in the Nordics was the recent subject of a major case of financial crime. The bank's operations in the Baltic region were thought to have potentially facilitated money laundering and sanctions breaches valued in the hundreds of billions of euros.

FTI was engaged to advise on the extent of these failings, assess the weaknesses in the bank's anti-money laundering and counter-terrorist financing (AML/CTF) framework and identify suspicious customers and transactions.

Key highlights:

- FTI deployed 21 algorithmic detection scenarios to collect and analyse potentially suspicious transaction data over a five-year period
- This full-scale investigation involved 40 terabytes of data, 20 million documents collected and processed and 30 billion transactions analysed
- 250 FTI professionals onboarded

2. Leveraging Cutting Edge Technology Against Financial Crime

Financial crime is becoming increasingly more technologically sophisticated as criminals develop new ways of committing their crimes. In addition, emerging technologies have enormous potential in deterring criminal efforts. The combination of these two themes means that institutions must look at technology-enabled solutions to enhance their financial crime prevention, detection and investigation activities by reducing cost, improving efficiency and delivering stronger and more streamlined regulatory compliance.

Transforming and Automating Customer Onboarding and KYC

We are genuine leaders in the field of automating customer onboarding and KYC – not only did we write the FATF guidelines on automating KYC and similar work for local regulators, we've also delivered live solutions for 15+ FS organisation in the past 18 months.

Some of our recent work includes:

- Working with regulators to define mechanisms for supervising and assuring automated KYC
- Designing end-to-end automated customer onboarding
- Delivering technology-enabled perpetual ODD
- Working to achieve regulator acceptance of automated onboarding
- Advising on next generation low-code automated policies
- Optimising KYC verification, data entry and overall quality assurance with machine learning techniques
- Delivering enhanced PEP and Sanctions screening capabilities
- Delivering vendor assurance and due diligence
- Bespoke proof-of-concepts for automated KYC elements for complex businesses

Enhancing and Augmenting Transaction Monitoring and Trade Surveillance

Our specialist teams of Financial Crime risk experts, data & analytics experts and technology experts work with firms of all sizes to build or augment their transaction monitoring and trade surveillance solutions.

Our team specialise in both augmenting existing solutions and in building bespoke tools – often leveraging enhanced technologies.

Some of our recent work includes:

- Augmenting transaction monitoring with AI and machine learning to reduce false positives – including both auto-tuning rulesets and auto-closing alerts
- Building data-enabled fraud detection systems – including for emerging typologies, such as account takeover money mules
- Using data science to transform customer segmentation for transaction monitoring
- Designing internal blockchain-based trade monitoring systems
- Bespoke Sanctions screening solutions and assurance mechanisms
- Vendor selection and configuration exercises

Next-Generation Remediation, Intelligence and Investigations

Technology-enabled investigations are the core of FTI's work globally, and we bring this expertise to both outsourced work and in an advisory capacity to both investigative and remediation exercises.

Our teams leverage advanced workflow tools alongside natural language processing, automated decisioning and secondary data analysis to achieve a step change in productivity.

In addition, our intelligence specialists (many from genuine intelligence backgrounds) help to build both national and in-firm FIU functions – including everything from sophisticated best practice for mature geographies to pragmatic intelligence functions for mid-size FS institutions.

Some of our recent work includes:

- Rapidly undertaking data-driven reviews of books of business to identify Financial Crime risks
- Designing and building data-enabled FIUs and data-exploitation mechanisms for multiple geographies
- Replacing large-scale manual remediation exercises with leaner, more effective data-driven exercises
- FTI's Augmented Investigations (Advanced Analytics), leveraging machine learning, natural language processing, classification analysis, time series analysis and network analytics



CASE STUDIES LEVERAGING CUTTING EDGE TECHNOLOGIES AGAINST FINANCIAL CRIME

Design and delivery of fully automated customer onboarding for tier one globalbank

This tier one global bank had a highly manual, paper-based customer onboarding process that was disjointed across underlying business lines. This led to significant operational inefficiencies, differing levels of regularly compliance and a poor customer experience.

Our team were engaged to redesign the customer onboarding process for the customer's wholesale and corporate banking.

Key highlights:

- Our team created a vision for the customer onboarding journey that joined together best-in-breed financial crime technology covering ID&V, data aggregation and pre-fill, screening, automated customer risk scoring and product fulfilment
- We simplified the KYC data requirements and removed duplication from the onboarding documentation
- We reduced overall customer onboarding time from an average of 25 days to 2 days
- We supported the client in gaining regulator's approval of the automated approach in 15+ countries

Using data science to augment existing transaction monitoring solutions

Our client had an established AML/CFT transaction monitoring system that had passed a number of regulator inspections – but remained inefficient and produced a substantial number of false positive alerts.

Our team were engaged to augment the existing system using a variety of mechanisms to increase effectiveness and reduce inefficiencies.

Key highlights:

- Our team used industry benchmarks to refine the existing ruleset to better align with best practice
- Our data science experts were able to materially improve the customer segmentation, reducing false positives for a number of rules
- We introduced an auto-close functionality for the most prominent alerts, in line with regulator expectations and the firm's risk appetite
- Our team's efforts over a 12-week period led to a material drop in false positives and ongoing operating costs

Building the first blockchain-based trade monitoring system for a major investment bank

Our client's existing trade and transaction monitoring systems were due for upgrade and renewal

– and the bank wanted to take the opportunity to move to a more modern approach.

Our team were engaged to support with designing the system and supporting business architecture, as well as leading on the regulator acceptance of the solution.

Key highlights:

- Leveraging industry-leading blockchain expertise to design an internal distributed ledger to form the basis of the potential solution
- Working with data scientists to test and confirm that the algorithms working to detect Financial Crime typologies provided appropriate coverage of the risks faced by the institution
- We led the regulator acceptance exercise of the new system – including ensuring equivalence testing versus the prior systems to demonstrate an uptick in effectiveness

3. Building Systemic Responses to Financial Crime

Through our extensive work for regulators, law enforcement, security services and the financial services industry itself, we have an unrivalled view of both the domestic and international regulatory agenda and full financial crime ecosystem.

Supporting regulators to better supervise and enforce Financial Crime legislation:

We are the trusted advisor for financial crime for many of the world's regulatory bodies, across multiple sectors. We understand that the role of global regulators is essential in both providing clarity and direction as well as delivering innovative approaches to supervising firms and sharing intelligence.

We work with regulators of all sizes and levels of maturity to modernise and enhance their approaches to fighting financial crime.

We are also trusted by regulators to provide expert and independent assurance and investigations on their behalf where we have unearthed some of the industries most high profile failings.

Some of our recent work includes:

- Regulator supervisory transformation and modernisation
- Supporting regulators to establish international reputation
- Transforming media coverage
- Conducting Skilled Person Reviews
- Providing outsourced monitorships
- Establishing international reputation

Working across the public sector to have a lasting impact in the fight against Financial Crime:

We are proud to partner a number of public sector institutions to support them in preventing financial crime – including law enforcement, security services, tax authorities and more.

A significant portion of our team have come directly from related backgrounds where they bring practical insight and truly understand the unique challenges from a public sector perspective.

Some of our recent work includes:

- Providing EU country responses to centralised regulatory changes
- Supporting with FATF mutual evaluation
- Delivering economic crime strategy, including country-wide frameworks
- Reshaping government agencies
- Providing economic crime intelligence and investigations
- Providing supranational liaison support

Acting as world-leaders in the development of Financial Crime public- private partnerships:

A welcome addition to the financial crime ecosystem has been the increase in public and private partnerships in recent years.

These partnerships have provided a step-change in financial crime prevention activities that sees law enforcement, government departments, security services and private sector institutions collaborate to safeguard the public and drive down serious financial crime.

Some of our recent work includes:

- Designing and building public private partnerships from scratch
- Delivering multi-agency incident responses
- Designing intelligencesharing frameworks
- Defining the public-private value chain
- Delivering market studies
- Designing KYC and transaction monitoring utilities
- Supporting intelligence-sharing task forces in multiple geographies on a pro-bono basis



CASE STUDIES BUILDING SYSTEMIC RESPONSES TO FINANCIAL CRIME

Redesigning a major European regulator's AML/CFT supervision in line with international best practice

A major European regulator had faced criticism of their AML/CFT supervision from supranational authorities – and engaged our team to provide an expert view on how to leverage best practice without incurring a disproportionate level of cost.

Our team redesigned their overall approach to supervision, including a new handbook for all inspection types and a data-driven dashboard for identifying both thematic areas of concern as well as specific institutions.

Key highlights:

- Our team introduced the client to multiple regulators on three continents, to leverage best practice from as many sources as possible
- Created an inspection handbook designed to allow relatively junior staff to effectively assess even a major financial institution
- Developed and implemented a data-driven scoreboard to drive and prioritise the client's supervision over a multi-year horizon

Acting as the formal monitor for one of Europe's largest banks on behalf of multiple regulators

A European regulator had recently gained monitorship powers for the first time – and appointed our team to act as their first ever monitor for one of Europe's largest banks.

The role subsequently expanded to include formal reporting to multiple European and US regulators, informing a number of simultaneous enforcement discussions.

Key highlights:

- Provided a small team of genuine experts to formally assess the deliverability and effectiveness of the bank's financial crime
- change and remediation plan – an enormous exercise spanning 19 concurrent programmes across 3 continents
- Delivered regular formal reporting identifying areas of success or concern to enable more effective supervision by multiple regulators
- Responded rapidly to changing focus areas from the different supervisors in-scope

Designing and building the UK's National Economic Crime Centre

The UK had decided to take significant step forward in the fight against financial crime with the creation of the National Economic Crime Centre and the supporting National Data Exploitation.

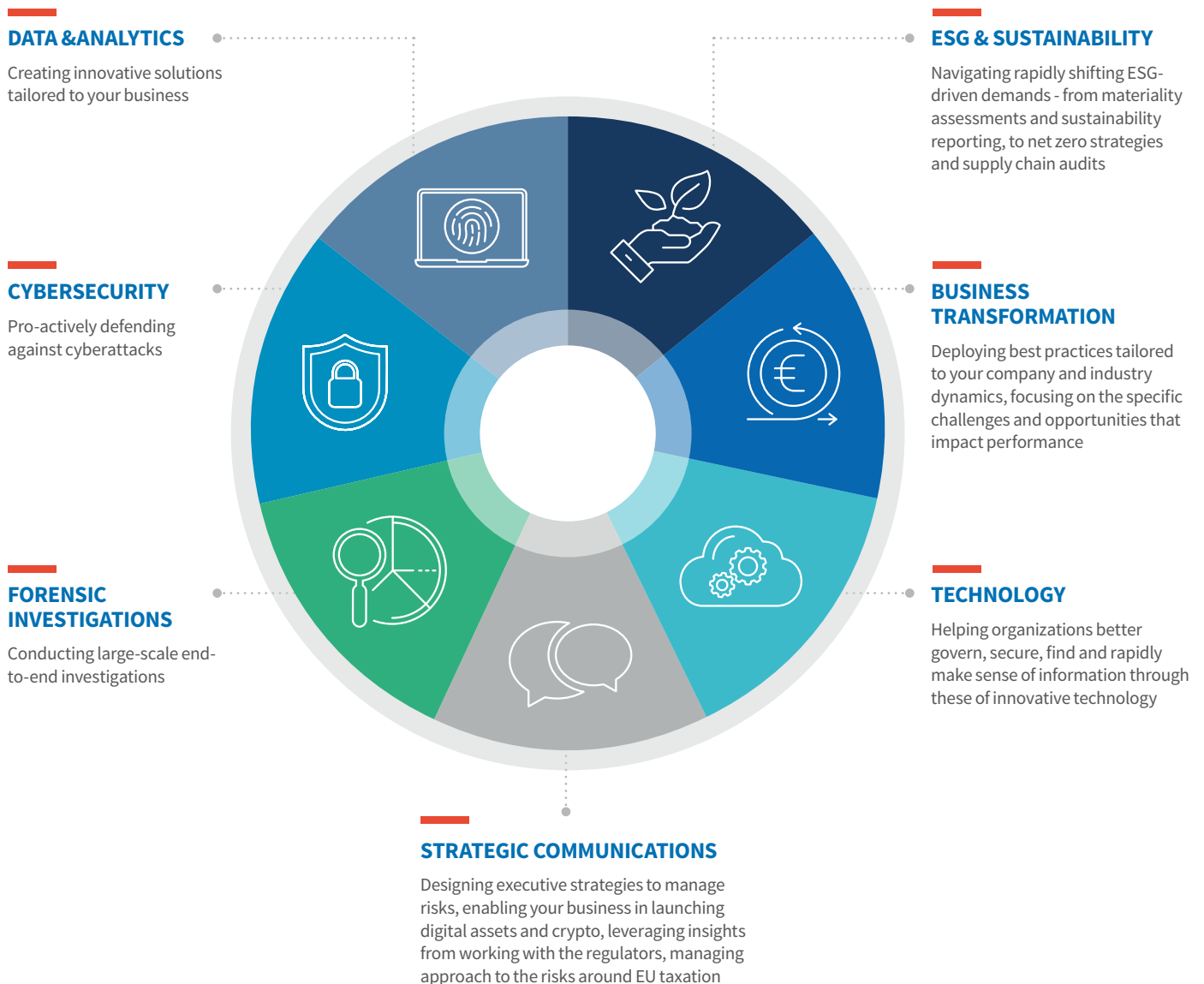
Recognising our team's unparalleled expertise in delivering financial crime public-private partnerships, our team were appointed to lead the design and setup of the NECC – including full target operating model design and underlying technology stack.

Key highlights:

- Deploying a multi-capability team of experts in public sector collaboration, financial crime intelligence, technology and data & analytics to design this world leading multi-agency body
- Supporting one of the most complex data-sharing exercises ever undertaken in the financial crime space – including identifying and delivering initial use cases that were possible under existing legislation

Our cross-functional capabilities offer innovative approaches to fighting financial crime

At FTI our work is expert-led and draws upon the entire firm; we exist in a collaborative environment which lets us combine various skillsets swiftly to identify tangible solutions for our clients. We regularly work alongside a number of our colleagues, including:





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5.44

5.25

55.01

11.08

Our EMEA Financial Crime Leadership Team



RICHARD GRINT

Senior Managing Director and
Head of EMEA Financial Crime Compliance

Richard is a leading global expert in the prevention, detection, and investigation of all forms of financial crime, and is responsible for leading FTI's anti-financial crime work across EMEA.

He has led over 500 financial crime related assignments, spanning compliance assessments, regulator intermediation, monitorships, customer onboarding/KYC automation, transaction monitoring optimisation, forensic investigations and more.

Richard has led assignments in over 29 countries across Europe, the Americas, the Middle East, Africa and Asia, and his expertise spans money laundering, fraud, bribery & corruption, terrorist financing, market abuse, sanctions, tax evasion and the proliferation of prohibited weapons. His clients include law enforcement, regulators and many of the world's largest FS institutions.

Richard works extensively on behalf of geographies and supranational bodies and is the only private sector individual to be asked to join the UK's formal delegation to FATF, where he has worked to shape the future of international AML/CFT regulation. He also lectures on economic crime across multiple Tier 1 global universities.

Most recently, Richard acted as the Skilled Person for the UK FCA's review of one of the world's largest banks, is the named Monitor for a major European bank, and has been leading the FATF mutual evaluation processes for multiple geographies.



CRAIG MCLEOD

Senior Managing Director and
Head of UK Financial Crime Compliance

Craig is an experienced financial crime leader with a proven track record of leading complex financial crime transformation engagements at some of the world's leading financial and public services institutions globally.

Craig has led over 250 financial crime related assignments spanning end-to-end framework reviews, policy and standards design, customer onboarding automation, remediation delivery and optimisation, and technology vendor selection.

Craig has held senior financial crime roles at a variety of firms including the Big 4, boutique advisory and systems integrators. This diverse experience means that Craig has worked on a wide range of client issues and can leverage rich insights from across the financial crime ecosystem.

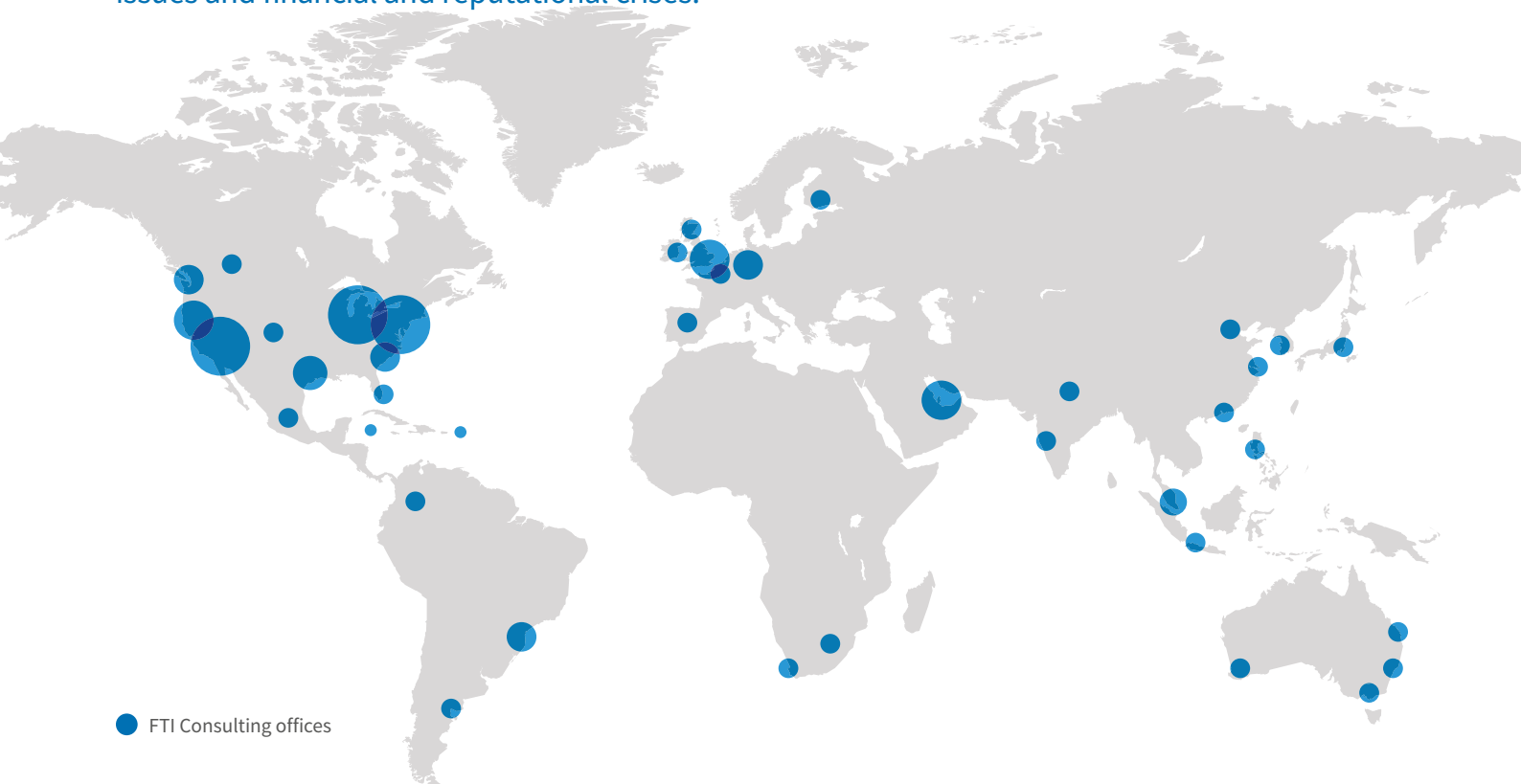
Craig leads a team of deep subject-matter experts who support clients with some of their most challenging and high profile financial crime matters. This includes both responding to external events and regulatory pressure as well as proactively supporting the design of innovative, future-proofed financial crime processes and controls.

Craig has supported clients globally and has worked in over 20 countries Europe, North America and Asia.

His clients include 4 of the world's top 10 banks, a large number of leading regional financial services institutions, financial crime technology providers and the world's largest sovereign wealth fund.

An Overview of FTI Consulting

FTI Consulting is a US-listed company providing advice and support to global clients on complex financial, operational and reputational matters, including investigations, disputes, regulatory issues and financial and reputational crises.



FTI Consulting is an **independent global business advisory firm** dedicated to helping organizations **manage change, mitigate risk** and **resolve disputes**. Due to our unique mix of **EXPERTISE, CULTURE, BREADTH OF SERVICES** and **INDUSTRY EXPERIENCE**, we have a tangible impact on our clients' most complex opportunities and challenges.

 <p>Advisor to 98 of the world's top 100 law firms</p>	 <p>With over 6,700 employees and offices in 30 countries on six continents, our breadth and depth extends across every major social, political, and economic hub around the globe</p>	 <p>59 of the Global 100 corporations are clients</p>	 <p>Trusted advisers serving clients globally with diverse expertise and exceptional credentials including accountants, economists, engineers, former CFOs, and strategists</p>
 <p>Founded in 1982 and \$3.5BLN equity market capitalization*</p>		 <p>Advisor to 8 of the world's top 10 bank holding companies</p>	
 <p>We combine unparalleled expertise and industry knowledge to address critical challenges for clients</p>	 <p>We are a global advisory firm that provides multi-disciplinary solutions to complex challenges and opportunities</p>	 <p>Expertise across a range of industries: Real estate; energy; power and products; financial institutions & insurance; healthcare; life science; retail & consumer; and telecommunications, media, and technology</p>	

Number of shares outstanding as of February 17, 2022, times the closing share price as of February 24, 2022.


FTI Consulting

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EXPERTS WITH IMPACT™

FTI Consulting is an independent global business advisory firm dedicated to helping organizations manage change, mitigate risk and resolve disputes: financial, legal, operational, political & regulatory, reputational and transactional. FTI Consulting professionals, located in all major business centers throughout the world, work closely with clients to anticipate, illuminate and overcome complex business challenges and opportunities.

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