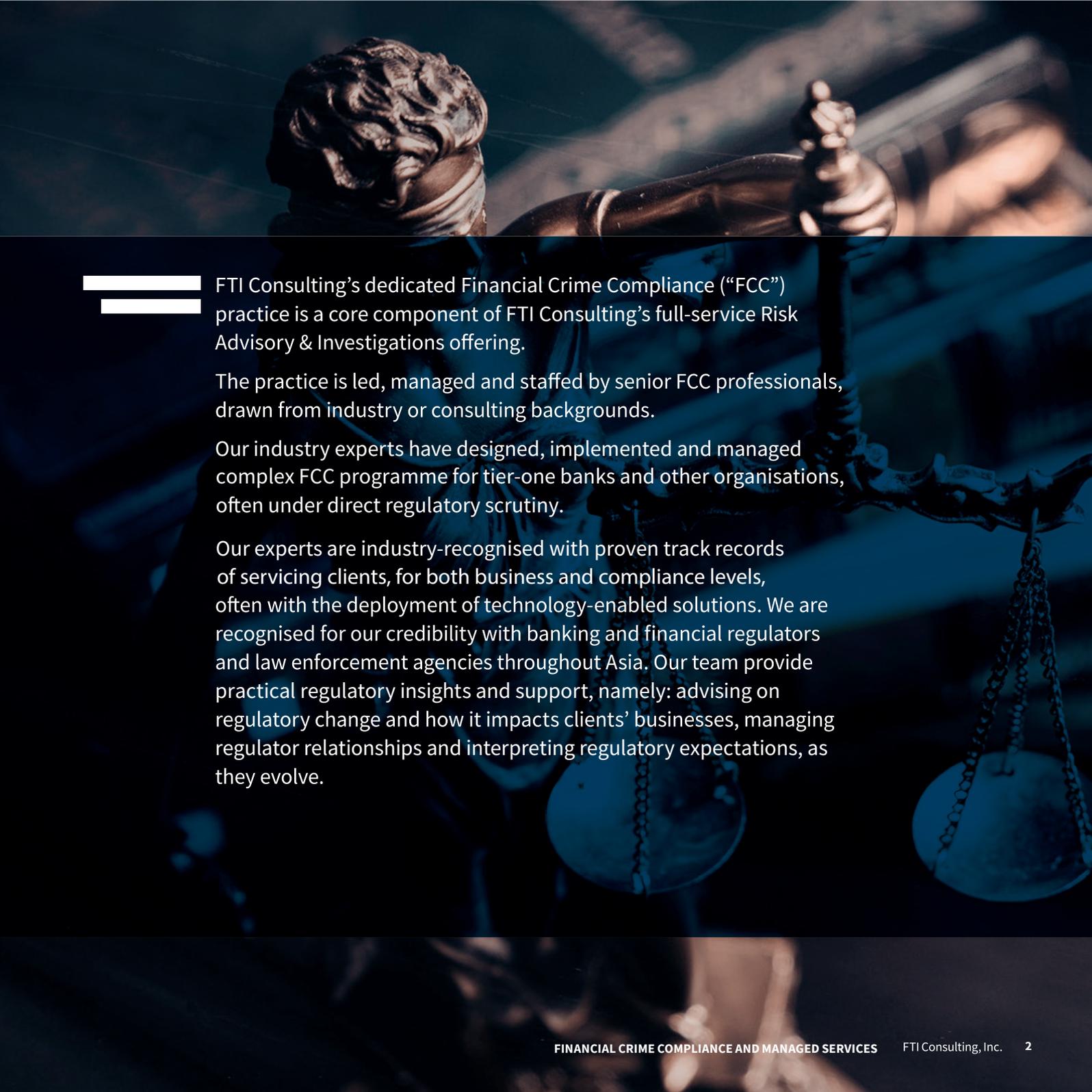




Financial Crime Compliance





FTI Consulting's dedicated Financial Crime Compliance ("FCC") practice is a core component of FTI Consulting's full-service Risk Advisory & Investigations offering.

The practice is led, managed and staffed by senior FCC professionals, drawn from industry or consulting backgrounds.

Our industry experts have designed, implemented and managed complex FCC programmes for tier-one banks and other organisations, often under direct regulatory scrutiny.

Our experts are industry-recognised with proven track records of servicing clients, for both business and compliance levels, often with the deployment of technology-enabled solutions. We are recognised for our credibility with banking and financial regulators and law enforcement agencies throughout Asia. Our team provide practical regulatory insights and support, namely: advising on regulatory change and how it impacts clients' businesses, managing regulator relationships and interpreting regulatory expectations, as they evolve.

Whether your FCC needs are self-identified, driven by changing standards, efficiency needs or the result of regulatory enquiry or investigation, FTI Consulting has the tools, resources and expertise to address them in a timely, efficient and high-quality manner. We help clients ensure their programmes are appropriately designed, implemented and optimised to address the risks associated with their businesses, ensure compliance in the context of a complex and developing regulatory landscape, and resolve regulatory enquiries. We understand challenges in today's complex regulatory compliance environment and ongoing cost pressure.

The careful composition of our team and the emphasis we place on utilising senior experts, means FTI Consulting is uniquely placed as a trusted advisor to offer our clients deep subject matter expertise and tailored solutions.

With offices across Asia Pacific (including China, Hong Kong, India and Singapore), EMEA and the Americas, FTI Consulting assists clients in addressing FCC-related issues or delivering change programmes at the local, regional or global level.

Our Service Offerings



Programme design,
development and implementation



Programme enhancement,
optimisation and remediation



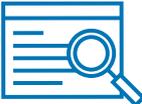
Programme effectiveness
and sustainability reviews



Implement, optimise,
or validate transaction
monitoring and transaction
screening systems



Provide RegTech advisory and
analytics services to improve risk
management and reduce
operational burdens



Conduct regulator mandated
independent reviews, monitorships,
and investigations



Design and implement
enterprise-wide risk
assessments



Work with legal advisors in
the context of regulatory
enforcement or investigations



Assist clients to effectively manage
regulator relationships and
strategies, and interpret
regulators' expectations



Board-level, key person and
staff training

Related Services

Cybersecurity

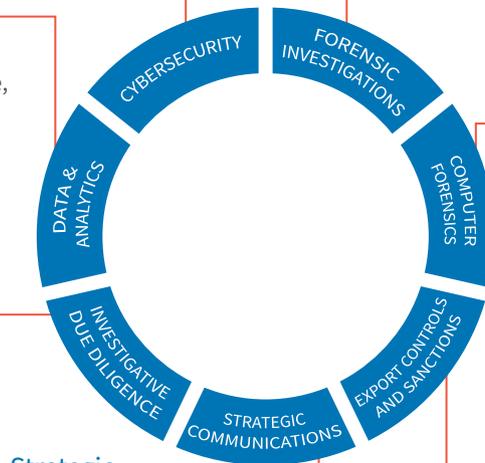
As financial crime and cyber related incidents and typologies continue to converge our cyber experts can help clients of any size address the most critical needs and integrate new solutions on top or alongside pre-existing policies and programs.

Data & Analytics

Delivering strategic business solutions to clients requiring indepth analysis of large, disparate sets of financial, operational and transactional data.

Investigative Due Diligence

Undertaking sophisticated investigations, uncovering actionable intelligence and performing value-added analysis to help decision-makers address and mitigate risk, protect assets, make informed decisions and maximise opportunities. These types of services can be performed in either a pre-IPO context or in relation to a prospective / existing client of a FI.



Strategic Communications

Our strategic communications experts design and execute strategies for clients managing financial, regulatory and reputational challenges. With a focus on reputation management and government advocacy, we can advise and promote government and non-government related FCC initiatives.

Forensic Investigations

Providing a multidisciplinary approach to complex factual, financial and business critical investigations, combining functional expertise in corporate internal investigations. This offering is often paired with law enforcement or monitor-imposed investigations undertaken to satisfy sensitive FCC-related regulatory commitments.

Computer Forensics

Helping organisations root out fraud, maintain regulatory compliance, reduce legal and IT costs, protect sensitive materials, quickly find facts and harness organisational data to create business value.

Export Controls, Sanctions & Trade

Helping to navigate the complexity of export controls and sanctions laws by carrying out due diligence, preparing licenses and licensing strategies, designing risk models, developing practical policies and procedures, and crafting training programmes.

Anti-Money Laundering

With over 40 regulators, APAC is one of the most complex jurisdictions in terms of its regulatory compliance landscape.

Across the globe in all key financial centers, enforcement actions and penalties for money laundering and terrorism financing failures continue to increase over the past decade. This trend shows no sign of stopping, with the expanded remit of the scope of AML legislation and the additional scrutiny from wider authoritative bodies. Against the backdrop of the rapid digitalisation of financial services, the industry faces new risks with increasingly sophisticated attempts of criminal networks to exploit the online economy. Senior management and boards of a wide scope of firms are increasingly acknowledging the threat of financial crime as a critical risk to their business that must be addressed.

Regulators across the globe are increasingly expecting and welcoming the use of technology to combat financial crime. Investment in technology is imperative not only to maintain compliant, but also to keep pace with the ever-increasing sophistication of criminals seeking to subvert the law.

Nonetheless, human element remains very important. By combining the efficiency and accuracy of digital solutions with the knowledge and analytical skills of human experts, a more robust systems that can effectively respond to AML/CFT requirements whilst being fully auditable and accountable.

“While it is fair to say most banks are getting the balance right, there should be no doubt on the part of the industry or the public that where they do not, we will take action”

Stewart McGlynn,
Division Head, AML, Hong Kong Monetary Authority

CASE STUDY

REGIONAL CLIENT DUE DILIGENCE DESIGN

Situation

FTI Consulting was engaged as an independent consultant by a large, global asset management firm to design its enhanced regional due diligence standards, as well as country-level policies and procedures.

Our Role

FTI evaluated the existing programme requirements against the client's global programme, applicable regulatory requirements, including industry best practices, and provided a detailed assessment in relation to identified gaps and recommendations to address required enhancements. Following detailed consultation with the client, and substantive re-drafting, we delivered to the client the re-designed Program Documents.

Our Impact

FTI designed the CDD regional standard and country-level policies and procedures based on a comprehensive assessment of the customer identification and due diligence components of its financial crime risk management framework. FTI also provided onsite leadership and management of the firm's wider AML programme.

Anti-Money Laundering

CASE STUDY

ANTI-MONEY LAUNDERING DATA ANALYTICS PROGRAMME

Situation

FTI Consulting was engaged by one of the largest life insurance groups to design and document an AML Data Analytics ('DA') Programme.

Our Role

Create a new programme that would operate as an 'overlay' to its traditional, rules-based, post transaction monitoring and AML investigation processes.

Our Impact



FTI worked closely with the client's regional senior management, as well as key AML compliance professionals, to design the DA programme and draft a DA standard and related procedures to ensure the DA programme aligned seamlessly with other components of the wider AML programme.

CASE STUDY

REGULATORY GAP ASSESSMENT ANALYSIS AND ONGOING EFFECTIVENESS MONITORING

Situation

FTI Consulting is assisting a bank in Asia, responsible for over 80% of all trade in the country, to perform local regulatory gap analysis, provide ongoing effectiveness testing, and advise board and management on retention/expansion of USD correspondent relationships.

Our Role

FTI will provide ongoing regulatory advice and alignment support to satisfy recent regulatory changes and advise on compliance demands. FTI is reviewing and testing the effectiveness of the bank's Financial Crime Enhancement Plan and a series of recently enhanced programmatic documentation to ensure they adhere to local requirements.

Our Impact

To enable the bank to continue advancing their compliance programme to a standard that both satisfies their regulator and helps advance the country's application of financial crime compliance more broadly.

Economic Sanctions

In recent years, sanctions have, once again, become an increasingly utilised tool.

Sanctions laws, and related guidance, are complex, continue to be in flux and give rise to potential conflict of law issues and other uncertainties. Ensuring compliance is therefore challenging with Asia clients focusing on the effectiveness of their sanctions programmes to identify, assess and manage sanctions risk.

In part, this focus has been driven by Office of Foreign Assets Control (OFAC) strengthening its approach on compliance expectations; the updated European Union (EU) Blocking Statute which has introduced new compliance hurdles; the potential divergence between United States (US) and EU sanctions policies; and questions raised around the United Kingdom's (UK) treatment of EU sanctions post-Brexit. Most importantly, for the Asia region, China has established formal mechanisms for sanctioning foreign entities and individuals designated as “unreliable” through the Provisions on the Unreliable Entity List and created a framework for “blocking” foreign sanctions and export controls against Chinese interests through the Rules on Counteracting Unjustified Extra-territorial Application of Foreign Legislation and Other Measures.

“I probably spend about 50 percent of my time... on sanctions... We're dealing with, as you know, some of the most complicated issues right now”

*Steven Mnuchin,
United States Secretary of the Treasury*

CASE STUDY

SANCTIONS SCREENING PROGRAMME

Situation

In the context of a potential breach of OFAC-related Sanctions, having discovered it may have inadvertently transacted with a Specially Designated National (SDN), FTI Consulting was engaged by a multinational bank.

Our Role

To review and map out its end-to-end sanctions screening programme, at the centralised and local level across multiple jurisdictions, in an effort to identify any weaknesses, from a system, process or controls perspective as they may have related to OFAC SDN screening.

Our Impact

FTI Consulting's work involved an assessment of the specific requirements in place, and their effective operation, at specific times before, during and after the customer became an SDN.

Anti-Bribery & Corruption

As with other areas of financial crime, it is likely to see greater financial penalties and longer custodial sentences as they might relate to Anti-Bribery and Corruption violations. It remains of paramount importance that Anti-Bribery and Corruption programmes are up-to-date in order to address risks associated with their evolving business.

“The overall trend is that corruption remains a global threat and maybe it has become even more on the top of the international agenda, it is the number one issue”

Patrick Moulette,

Head of the Anti-Corruption Division, Organisation for Economic Co-operation and Development

CASE STUDY

FINANCIAL CRIME RISK ASSESSMENT

Situation

FTI Consulting has been engaged to design and implement an AB&C risk assessment, and provide recommendations to close any control gaps/ weakness/ risks identified for a leading Hong Kong institution.

Our Role

FTI Consulting assisted to conduct a AB&C Assessment of the procurement department.

Our Impact

FTI was asked to review the company’s procurement model and identify and assess the AB&C risks that exists for the entity. Specifically, FTI helped the entity in:

- Identifying and defining the key inherent AB&C procurement risks
- Mapping the respective risks to overall procurement processes
- Assessing the design and operating effectiveness of the controls in place
- Providing recommendations to management with respect to any residual risks and mitigating controls
- Performing benchmarking of their procurement department



Why FTI Consulting for Financial Crime Compliance Solutions?

Our professionals have the expertise needed to accurately assess problems, understand clients' and regulators' requirements, and design the appropriate solutions. We blend our expertise and investigative experience with our specialised technology and data services to develop cost-effective solutions for our clients.

Credibility and Independence

We are recognised for our credibility with regulators and our independence. We do not provide audit attestation services.

Industry, Regulatory and Consulting Experience

Our teams are composed of professionals with senior executive industry, regulatory and consulting experience which enables us to provide practical regulatory insights and support.

Innovative & Advanced Solutions

We bring FTI Consulting's experiences from a wide range of industries which face similar challenges, to deliver innovative, pragmatic, and effective solutions for our clients. We offer advanced technology solutions to enable our clients to better manage their governance, risk and regulatory challenges. We have access to a range of economists, statisticians and analysts to support our work.

RegTech

Our APAC FCC Analytics team has extensive experience delivering complex analytics and RegTech-related solutions incorporating Artificial Intelligence (AI), Robotic Process Automation (RPA) and Optical Character Recognition (OCR) technology to FIs to enhance their risk management and reduce internal process burdens. Our success in these engagements stems from our deep knowledge of key RegTech players in the market coupled with our understanding of the operational and regulatory demands faced by financial services organisations seeking to pilot or implement AI and ML methods to help tackle financial crime issues.

Local Language Capabilities

We have extensive experience working on complex issues and multi-faceted assignments, to which we bring a wide range of experience, skills and practical knowledge. We provide staff with local language capabilities when needed and work across segments in a collaborative and efficient manner.

Quality and Integrity

Our heritage of litigation and regulatory assignments underpins a consistent commitment to quality and integrity. Our experience in investigating failures and errors means we know how to ensure they are avoided in future.

Experts With Impact

FTI Consulting's senior leaders combine deep industry background in regulation, compliance, and investigations, with a long history of successfully undertaking our most sensitive consulting assignments. Our senior staff members lead from the front and actively participate throughout engagements.

Definitive Expertise



Named **Consulting Firm of the Year - Fraud & Financial Crime Category**, *Regulation Asia Awards (2023)*

Named **Best AML/CFT Data, Analytics & Visualisation Solution - Fraud & Financial Crime Category**, *Regulation Asia Awards (2023)*





Anna Bleazard

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Anna Bleazard is a Senior Managing Director, Head of FTI's Financial Crime Compliance practice in Asia and Co-Head of Risk and Investigations for Southeast Asia. She has over 18 years' of professional experience in the financial crime investigations, advisory, disputes, financial accounting and auditing field.

Prior to joining FTI Consulting, Anna worked for a "Big Four" professional services firm. Anna has experience performing regulatory driven investigations and reviews and has worked at the behest of the Monetary Authority of Singapore (MAS), Department of Justice (DoJ) and Securities and Exchange Commission (SEC). She frequently speaks at conferences, and is quoted in the media, about Financial Crime topics, regulatory developments and compliance challenges including AML, economic sanctions, fraud, bribery and corruption.

Relevant Experience

- **Target Operating Model:** Performed a review of the operating model and controls currently in place to identify and mitigate first party lending fraud at a large global bank and designed a global TOM based on findings and benchmarking.
- **Payment Services:** Advisory support to Payment Services Companies through the license application process and assist with the development and enhancement of their compliance programmes.
- **Bribery & Corruption:** Led numerous bribery and corruption investigations to identify violations of local and internal laws including FCPA and UKBA. Expertise in performing internal controls and compliance reviews to mitigate risks.
- **Fraud:** Led numerous fraud advisory engagements including fraud risk assessments, programme reviews and control design assessments.
- **Regulatory Investigations:** Sensitive, regulator-imposed KYC file reviews and transaction investigations to identify procedural lapses, sanctions, or money laundering violations across retail, private banking, corporate, trade finance, and correspondent banking segments requiring escalation to Compliance and/or government authority(s).

Industry Expertise

- Multinational, regional and local banks
- Insurance
- Law Firms (contentious and non-contentious matters)
- Financial Institutions



Jackie Yu

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Jackie Yu leads FTI's Financial Crime Compliance practice in Mainland China and is a senior compliance professional with over 20 years' experience in the financial services industry.

Jackie possesses extensive experience in the banking field. He had worked in The China Construction Bank, The Bank of East Asia (China) Limited, United Oversea Bank (China) Limited and OCBC Bank (China) Limited for almost 20 years with a strong background and exposure in different banking areas. With his expertise in the field of AML/CFT and sanction compliance, he was invited to represent the private sector in China's 4th FATF Mutual Evaluation. He was also nominated by the People's Bank of China (PBOC) as a member of the Financial Action Task Force (FATF)'s Expert Group. He had also been invited to provide training to the colleagues of China Banking and Insurance Regulatory Commission (CBIRC), People's Bank of China (PBOC) and financial institutions.

Relevant Experience:

- **Money Laundering Risk Assessment:** Completed the money laundering risk assessment projects of institutions such as Industrial and Commercial Bank of China, Ping An Bank, Bank of Gansu, China Guangfa Bank, China Minsheng Bank, CITIC Securities, and Huatai Futures.
- **Anti-money Laundering Systems:** Completed the construction and upgrade of anti-money laundering systems for Ping An Group and Nanyang Commercial Bank.
- **Regulatory Inspection:** Completed the follow-up improvement work of BNP Paribas and Bank of East Asia to complete their regulatory inspection.
- **Anti-money Laundering Consulting:** Leading the team to complete a number of anti-money laundering consulting projects in other financial industries.
- **Training:** Took the role as a part-time lecturer at Peking University to provide training in the field of anti-money laundering and sanctions compliance for Chinese anti-money laundering regulatory agencies and many financial institutions.

Industry Expertise:

- Multinational, regional and local banks
- Financial Institutions
- Insurance
- Investment Management/Asset Management

About FTI Consulting

With offices in every major financial center and every corner of the globe, we successfully serve our clients wherever challenges and opportunities arise.



● FTI Consulting offices

At a Glance



8,000+
Employees
Worldwide

Advisor to
99 of the world's top **100** law firms

\$7.7B

Market Cap¹

50

Advisor to the world's top **50** bank holding companies



31
Countries

82

of Fortune Global 100 corporations are clients

50/100

Advisor to **50** of the top **100** Private Equity International firms

780+

Senior Managing Directors

What Makes Us Unique



Definitive Expertise

Our professionals are experts with extensive practical experience applying that expertise to generate decisive impacts.



A Culture that Delivers

Our culture and working style reflect a bias toward the tangible and a tenacity for meaningful solutions that make a difference.



Comprehensive Services

Our practices, as stand-alone offerings and comprehensive solutions, address the range of interconnected issues our clients face.



Industry Experience

Our industry groups are staffed with seasoned practitioners who possess years of hands-on management and operational experience across 16 industries.

(1) Number of total shares outstanding as of October 19, 2023, by the closing price per share on October 26, 2023.

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FTI Consulting is an independent global business advisory firm dedicated to helping organisations manage change, mitigate risk and resolve disputes: financial, legal, operational, political & regulatory, reputational and transactional. FTI Consulting professionals, located in all major business centres throughout the world, work closely with clients to anticipate, illuminate and overcome complex business challenges and opportunities © 2023 FTI Consulting, Inc All rights reserved **fticonsulting.com**