



Grant Thornton

Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF) Internal Audits

Grant Thornton Bermuda

Introduction

Under the Proceeds of Crime (Anti-Money Laundering and Anti-Terrorist Financing) Regulations 2008 (POCR), an AML/ATF Regulated Financial Institution must ensure an independent AML/ATF audit is conducted annually. The audit must be conducted by a qualified independent third party or internally by persons independent of any other function and independent of the lines of business over which the function has audit responsibilities and financial operations.

The independent audit function must provide and document an independent and objective evaluation of the reliability, integrity and completeness of the design effectiveness of the AML/ATF framework, including testing the internal controls on an annual basis.

Who needs us?

- Banks
- Digital Asset Businesses
- Money Service Providers
- Insurance Managers
- Fund Administrators
- Corporate Service Providers
- Insurance entities carrying out long-term insurance

Annually, we prepare

100+ Audit Reports

for

80+ Audit Clients

across

10+ Industries

How can we help?

As part of our service offering, we will work in partnership with you to provide an audit solution that meets your needs and aligns with your objectives.

We provide a range of services across all industries to help Banks, Fund Administrators, Insurance Companies, as well as Payment Service Providers to supplement their Internal Audit function. With an ever changing AML/ATF landscape, having an experienced audit team is essential. Our AML Centre of Excellence comprises of subject matter experts who have helped clients with all AML/ATF matters.

We have a best in class offering that we provide to new and existing clients in line with the Institute of Internal Auditors (IIA) standards. Our Internal Audit Team works with various clients across the financial services sector supporting their Internal Audit functions. We provide a comprehensive specialist advisory service, that adds significant value to the delivery of the Internal Audit plan through the provision of industry best practice and insights.

Co-Sourced Internal Audit function

- Supporting existing Internal Audit functions by providing Internal Audit practitioners and subject matter experts to assist in the delivery of the audit plan.
- Utilising your Internal Audit methodology in all phases of audit delivery.
- Delivering reports directly to your Head of Internal Audit.
- Sharing industry benchmarks and best practice insights.

Outsourced Audit function

- Performing the Internal Audit Function for you using Grant Thornton methodology.
- Key phases include the annual risk assessment and planning process and execution of the annual plan using a blend of Internal Audit practitioners supported by subject matter experts.
- Reporting to management, the Board, and/or the Audit Committee as necessary.

Our Approach

In line with Grant Thornton's standards and your specific methodology, each Internal Audit is tailored to meet your individual requirements and fully comply with IIA standards.

Engagement Planning

- Audit Notification
- Planning Memo
- Risk and Control Matrix
- Audit Timetables
- Document request list

Fieldwork

- Completed testing and work papers aligned with IIA standards
- Summary of observations
- Stakeholder engagement

Reporting

- Status updates with stakeholders
- Draft and final audit reports
- Results of issue assurance testing



Audit Scope

The audit will provide a documented assessment of the firm's AML/ATF measures including:

- 1. Policies and Procedures** - assess the reliability, integrity and completeness of AML/ATF policies, procedures and controls, including risk assessment, risk mitigation and other measures to manage higher risks, Customer Due Diligence (CDD), ongoing monitoring, detecting and reporting suspicion of ML/TF, international sanctions, record-keeping and retention, and outsourcing relationships.
 - 2. AML/ATF Risk Assessment** - evaluate the risk assessment processes and the risk ratings assigned with respect to your customers, business relationships (including outsourcing and reliance relationships), countries or geographic areas, services, delivery channels, products and transactions.
 - 3. Transactions** - test the AML/ATF controls for transactions and activities, with an emphasis on higher-risk areas.
 - 4. AML/ATF Culture** - assess employees' knowledge of the relevant AML/ATF regulations and guidance, your policies, procedures and controls and the role of each relevant employee within the firm.
 - 5. Program Testing** - review past audit reports to assess the efficacy with which the firm has implemented previously recommended changes.
 - 6. Compliance** - test compliance with the overarching Bermuda Monetary Authority AML/ATF requirements.
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Why Grant Thornton?

Leading provider of Internal Audit services

Competitive pricing

Partnership

SME knowledge

- We regularly undertake AML/ATF audits for numerous regulated entities, ranging across organisations of all sizes;
- We will benchmark your AML/ATF measures against regulatory requirements and your high performing peers;

- The audit will be conducted by experienced, professional individuals. Our team will draw on their audit and industry experience, as well as the provision of similar services to clients to deliver a best in class service;
- We understand there is no ‘one size fits all’ and the most important element will be to consider what solution is best for you.

If you would like to learn more about our AML/ATF audit solutions, please contact a member of our team shown on the right.

Our experience

Insurance Manager

Grant Thornton is engaged for a number of leading insurance firms to act as an outsourced / co-sourced supplier of Internal Audit services.

International Banking Group

Grant Thornton is engaged by an entity as an outsourced Internal Audit provider to assess the design and operating effectiveness of key AML/ATF controls.

Payment Service Provider

Our team of Internal Audit experts support an entity’s Head of Internal Audit with conducting annual AML/ATF audits to assess adherence to regulatory expectations and operating effectiveness relating to Governance, CDD and Sanctions.

Key Contacts



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