Protiviti[®] Global Business Consulting



MANAGING SANCTIONS COMPLIANCE

SANCTIONS COMPLIANCE

Given the dynamic regulatory landscape in sanctions compliance, financial institutions and other multinational corporations must stay abreast of regulatory changes in sanctions risk. This requires having a clearly articulated risk appetite, robust horizon scanning, validated and tested screening and monitoring systems and processes, and a robust framework of mitigating controls to detect potential violations and avoid sanctions evasion tactics.

Challenges to Sanctions Compliance

Organizations face various challenges when establishing effective sanctions compliance. Therefore, staying up to date is crucial as monitoring laws, regulations and expectations are complex and change frequently. Furthermore, businesses should avoid siloed infrastructures which may lead to duplications of work, and which can result in poor data quality overall – whereas high data quality allows for transparency in data sources. Additionally, labour intensive processes, a lack of data integration, proper system calibration, and automation can result in significant false positives. This requires investigators to gather data from multiple sources and duplicate it in their case management tool. However, these manual investigative processes absorb too many resources and add unnecessary complexity to their workflow.

Components of an Effective Sanctions Compliance Model

Protiviti helps to improve the financial crime and sanctions programme to help you manage, measure, and mitigate your organization's risk exposure. Our approach is grounded on four vital elements:

- Governance framework: policies, procedures, access control, roles and responsibilities, risk appetite, change management, system controls
- Data, system and process validation: model design, data integrity and validation, system validation, and threshold setting
- Continuous calibration: ongoing verification, sensitivity testing, scenario rationalization, alert optimization techniques
- Risk assessment: continual updates to capture frequent regulatory changes, assess industry, country and ally-country exposure, product risk, inter alia



How Protiviti Can Help

Target Operating Model Streamlining processes to align with company goals, structuring teams, using technology for seamless operations and scalability, and reviewing on- and offshore models.

> Sanctions Risk Assessment Examining risks,

evaluating threats, and tailoring your organization's sanctions model.

Model Governance Review

Reviewing documents and processes related to system management oversight and user accountability, assessing deployment processes and sufficiency of model documentation.



Protiviti advises companies in a hands-on way and on a par in the areas of strategy, organizational transformation and optimization, ESG, digital transformation, risk management, internal audit and control systems, compliance, and IT. Together, we find individual solutions to position your company for years to come. Face the Future with Confidence.



Model Validation & Data Quality

Ensuring integrity and effective data management through end-to-end validation of data flows, designing test cases, and executing below and above the line testing to identify ideal thresholds. Data Analytics & Geolocation Detection Leveraging analytics and machine learning concerning risk score alerts, prioritizing, triage and autoclose, streamlining and automating process to capture, document, and organize alerts, and improving innovation with simulation-based approaches.

Health Check & Gap Assessment

Assessing system and process alignment with sanctions regulatory requirements, and aligning controls to ensure compliance with relevant laws and regulations.

Managed Service Solution

Gaining insight through level 1 and 2 alerts and escalation review, QC and QA processes, reporting and performance metrics, large scale lookback reviews and remediation as well as automated workflows.

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