

Course Syllabus

Sanctions: Trade Finance Case Study

Geographic Coverage: Global

Business Sector: All Business Sectors Involved in Trade

Regulatory Guidelines: Global-FATF

Course Description:

This course is a scenario-based case study demonstrating Sanctions basics for Trade Finance. Hands-on practice will take you through the steps of the Investigative Process and performing a Sanctions search. It helps identify Red Flags, defines breaches and demonstrates how Sanctions are applied, including how to complete a report to regulatory authorities.

Audience:

This course is designed for Financial Crime professionals, Compliance Professionals and Money Laundering Reporting Officers, and those involved in investigating Money Laundering, Terrorist Financing and Sanctions financial crimes.

Prerequisite: N/A

Duration: 1 hour +

Course Learning Objectives:

1. Define and describe what sanctions are, and who they apply to
2. Assess, analyze and categorize data using four AML Risk Filters (People, Money, Data and Location)
3. Understand sanctions breaches and violations
4. Understand the components of a reportable transaction
5. Compile a Suspicious Activity Report based on the steps of the Investigative Process, and understand the post-report actions

Course Outline:

Module 1: Sanctions Basics

This module serves as an information hub by offering content that covers a range of Sanctions basics, including:

- **The 5W's of Sanctions**
 - What are Sanctions?
 - When are Sanctions used?
 - Who uses Sanctions?
 - Why are Sanctions applied?
 - Which types of Sanctions are used?
- **FATF's Global Standards**
 - What is the FATF?
 - The 40 Recommendations
 - The 9 Special Recommendations
 - The Gray and Black Lists
 - Recommendations specific to Sanctions
- **Sanctions Misconceptions**
 - Multilateral and Unilateral Sanctions
 - The evolution of Sanctions
 - Sanctions Monitoring
 - Sanctions and Asset Freezes
 - Sanctions Exemptions
- **Red Flags and AML Risk Filters**
 - Sanctions Avoidance
 - Third Party Involvement
 - Virtual Currency
 - Politically Exposed Persons
- **Sanctions Screening**
 - Understanding the results of your Sanctions screen
 - Considering aliases, double last names, etc.
 - True Matches, Fuzzy Matches, False Positives and False Negatives

Module 2: The Investigation

In this module, the Investigative Process is introduced for the case study and broken down into a step-by-step process, which includes:

- **Planning an Investigation,**
- **Prioritizing an Investigative Response, and**
- **Gathering & Categorizing the Evidence.**

The next four modules focus on the assessment process using four filters. Each filter has an analysis, resulting in four supporting Dashboards that will be evaluated for reporting purposes.

Module 3: People Analysis

Module 3 analyzes the People and Connecting Structures involved in the case. Each person and entity is analyzed by considering the sources, their relevance to the case and the quality of the information.

Module 4: Money Analysis

Using a historical and transaction timeline, the money trail is established, followed and analyzed.

Module 5: Data Analysis

Relevant data is assessed, analyzed and compiled into a Data Dashboard which includes an overview of OSINT and screening tools.

Module 6: Location Analysis

A number of different elements are involved when analyzing the Location aspects of the case, including the people, connecting structures, and geographic locations, as well as the money trail and any pertinent information that the previous Data Analysis revealed.

Module 7: Assessment

Using the unique Dashboards that have been created, Module 7 is where case conclusions will be made by making relevant connections, using Red Flags and reflections.

- The information and results from the four Dashboards are reviewed.

Module 8: Final Report

An example of a completed Final Report is reviewed, next steps are outlined and a Tipping scenario is explained.

- A short video describes what a Sanctions violation is, including penalties, Home Country Connection Nexus, and reporting obligations.
- An example of a Final Report is presented along with steps to take if an Asset Freeze needs to be implemented.

Instructional Design Methodology:

Our philosophy is that people learn best by doing. Learning scenarios with a high level of interactivity are embedded in the course to represent real-life examples and practise decision-making.

Course Resources:

The KixSMART is a printable PDF course summary of the key points from the course.

The 5W's of Sanctions is a printable infographic that details relevant information from the 5W's of Sanctions video.

The Reportable Activity Checklist is a printable document that can be used as a reference tool.

Assessment:

An E-Test of 10 randomly generated multiple choice questions assessing each learning objective will be administered at the completion of the course modules. The passing grade is 80%.

Certificate:

A certificate of completion can be printed online.

Accessibility:

This course is complemented by audio. (Should you not have speakers on your computer, you may follow by reading the Course Transcript tab.)