Transaction Monitoring Assessment Checklist

Februrary 2023



Reviewing and testing the roll out of new or existing transaction monitoring models is an important component in ensuring your controls are compliant and effective. Based on <u>guidance from the Bank of Lith-</u> <u>uania</u>, FINTRAIL have created a transaction monitoring assessment checklist covering key areas that you should be considering when assessing the effectiveness of your transaction monitoring model.

	Yes	No
Are scenarios and monitoring tools based on ML/TF National Risk Assessment and other relevant typologies?		
Are monitoring and scenarios tailored to the business model and the existing customer portfolio of the firm?		
Are there individual terrorist financing monitoring measures and scenarios in place be- yond those designed to monitor the implementation of international sanctions?		
Are monitoring measures in place for all firm's products (e.g. trade finance, credit, in- vestment products, etc.)?		
Are all payment instruments (e.g. payment cards) subject to monitoring scenarios?		
Are both incoming and outgoing payment transactions monitored?		
Are there any fraud prevention scenarios or other monitoring measures in place?		
Does monitoring identify when a customer deviates from its normal business activity, or typical business activity of a customer group engaged in similar economic activities?		
Does monitoring cover the whole of the customer's business activity (all customer's accounts and conducted transactions)?		
Does monitoring cover internal transactions, i.e. in cases when both the payer and the payee are the customers of the firm?		
Do scenarios not overlap?		
Can monitoring measures in place detect transit or dormant accounts?		
Are online and ex-post automatic monitoring scenarios technically working properly?		
Are the alerts generated by monitoring scenarios reviewed in a timely manner, and is the process of alert backlog properly controlled?		
Is a process for reviewing and ensuring quality performance of monitoring solutions and scenarios is in place?		



About FINTRAIL

At FINTRAIL we are passionate about combating financial crime. Our unique team of experts is drawn from the industries we support and has deep hands-on experience in developing and deploying risk management controls from leadership roles with leading banks, FinTechs, and other financial institutions.

We have extensive experience to help you design customised transaction monitoring controls, including specific rule sets, scenarios and thresholds. We can assist with design and implementation, vendor selection / RFPs, testing, and remediation.

Our approach is tailored to the unique circumstances of each client, is regulatory and technology driven, and is focused on providing excellent customer outcomes. We offer our clients pragmatic solutions to the most complex challenges and our goal is to ensure our clients can thrive, free from the negative impacts of financial crime.

To find out more about how we can support your transaction monitoring controls, get in touch with our team at <u>contact@fintrail.com</u>



