

ICA Essentials Workshop Series: Managing Sanctions Risk

Sanctions and sanctions compliance presents unique challenges and risks to a business. Requirements are continually changing in response to changing geopolitical events. Therefore developing up to date, foundational understanding of the threat together with current best practice can help you ensure that your firm complies with international requirements.

What will you learn?

Defining sanctions

- What are sanctions, what are they designed to achieve and why are they important?
- Financial and non-financial measures
- Programmes: Regime-based, activity-based and comprehensive

The international context of sanctions

- Who are the international government bodies and what is their influence on the international sanctions landscape? (Including FATF, UN, EU, national governments, focus on the US/ UK)
- Impact of other bodies and external influences to sanctions implementation

Building a sanctions governance framework

- Defining roles and responsibilities within your organisation and how group policies and procedures can underpin effective sanctions compliance.
- How can an effective CDD process on individuals, entities and correspondent banks enable you to comply with sanctions law?
- Recognising sanctions evasion techniques, including wire transfers, stripping, and shell companies

Sanctions lists and screening

- Who and what should be screened? External and internal watch lists.
- How to calibrate your sanctions screening tools to consider fuzzy logic and minimise your false positives?
- The importance of an effective quality assurance process and how it can ensure your sanctions procedures are as effective as possible.
- Consider what sensitive words, dual use goods, countries, jurisdictions, regions, payments and transactions may result in triggers.

Managing sanctions alerts

- The importance of good CDD and the role of the Relationship Manager
- How to identify and evaluate sensitive sanctioned countries?
- What skills are required by the modern day compliance officer to discount customer and payment alerts?
- How to respond to a breach

The cost of getting it wrong

- An examination of some of the key enforcement actions, particularly driven by the US, in order to draw out common themes.
- An opportunity to discuss real case studies such as BNP, Paribas and HSBC, and consider how such breaches can be avoided in the future.

The challenge of change

- An examination of the constantly evolving sanctions environment. We will consider how political developments, such as recent developments in the relationship between the US and North Korea and Iran.
- What external resources are available for us to stay up to date with sanctions changes around the world?

Related Course: ICA Certificate in Managing Sanctions Risk