

Overview of the IAIS Insurance Core Principles on Anti-Money Laundering and Combating Financing of Terrorism

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- IAIS CP 22 on Anti-Money Laundering and Combating the Financing of Terrorism
- What kind of supervisor are you?
- Role of the insurance supervisor in combating ML & TF
- Risk case study

The International Standard Setters





The FATF Recommendations

Policy	Preventive measures	Operational measures	
Assessing Risk	Licensing & supervision	Criminalisation of ML & TF offences	
Co-operation & co-ordination	CDD, record-keeping & reporting suspicion	Intelligence	
	Transparency of beneficial ownership	Investigation	
		Prosecution	
		Confiscation	
Government	Supervisors Private sector	Financial Intelligence Units Law Enforcement	

ICP 22

Anti-Money Laundering and Combating the Financing of Terrorism

- The supervisor requires insurers and intermediaries to take effective measures to combat ML & TF
- The supervisor takes effective measures to combat ML & TF

AML & CFT responsibilities under ICP22

	Ins & AMLCFT	Ins only
Understand ML & TF risk exposure	Υ	Υ
Issue enforceable rules	Υ	N
Provide guidance	Υ	N
Give feedback	Υ	N
Apply risk based AML & CFT supervision	Y*	N*
Review effectiveness of AML &CFT measures	Υ	N
Co-operation and co-ordination	Υ	Υ

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Assessing risk and applying risk-based measures



Supervisory framework

- Taking account of ML risk
- Taking account of TF risk
- Risk-based supervision
- Remediation
- Enforcement
- Resourcing supervision and enforcement

Effectiveness

- Assessing effectiveness
- Proving effectiveness
- Information and statistics
- Making improvements

Co-operation and Co-ordination



Risk management in practice?

Hypothetical firm but real issues

- 20 minute video divided into 3 scenes
- 1st scene opening meeting with the Board
- 2nd scene review of client files
- Final scene supervisors discuss their initial findings with the Board



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