

# Transaction Monitoring & Alert Handling SOP (Financial Crime)

**Document Type:** Compliance SOP

**Version:** 5.1

**Business Unit:** AML Transaction Monitoring (TM)

**Last Updated:** 12 June 2024

**Applies To:** Westpac TM Analysts, Quality Reviewers, EDD Team

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## 1. Purpose

To provide guidance for identifying, reviewing, and escalating potentially suspicious financial transactions detected by Westpac's transaction monitoring platform (Actimize).

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## 2. Types of Alerts Monitored

Westpac's TM program generates alerts in the following categories:

1. Large Cash Transactions
  2. Rapid Movement of Funds
  3. Structuring / Smurfing
  4. International High-Risk Transfers
  5. Dormant Account Reactivation
  6. Third-party Transfers Not Aligned to Customer Profile
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## 3. Analyst Review Steps

For every alert:

### 3.1 Initial Review

- Verify account ownership
- Validate customer profile and expected activity
- Review past 90-days transaction history
- Examine behavioural patterns

### 3.2 Customer Risk Consideration

- Geographic risk
- Product risk

- Business activity
  - Screening outcomes
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## 4. Red Flags Requiring Escalation

Escalate the TM alert to EDD or MLRO when any of these appear:

- Structuring patterns (e.g., \$9,900 repeated deposits)
  - Transfers to crypto exchanges inconsistent with profile
  - Multiple failed login attempts before large transfer
  - International transfers to sanctioned or high-risk jurisdictions
  - Sudden account behaviour inconsistent with income
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## 5. Documentation Requirements

Analysts must attach:

- Investigation notes
- Screenshots of transaction activity
- Risk rationale
- Customer profile summary

All notes must be **neutral, factual, and non-speculative**.

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## 6. STR Filing Criteria

Submit a Suspicious Matter Report (SMR) when:

1. There is reasonable suspicion of ML/TF
2. Customer provides misleading explanations
3. Transaction patterns cannot be rationally explained
4. Customer refuses to cooperate with verification requests

SMRs must be submitted to AUSTRAC within **24 hours** of suspicion confirmation.