

Enterprise-Wide AML Risk Assessment Summary

MaplePay Technologies Inc. – Mock Document

1. Assessment Date and Scope

Assessment Date: 2025-10-15

Scope: All payment processing, money transfer, and foreign exchange activities conducted by MaplePay.

2. Inherent Risk Factors

Products and Services:

- International remittances – Medium to High risk
- Domestic e-commerce payments – Low to Medium risk

Geographic Exposure:

- Primary: Canada, United States – Lower risk
- Secondary: India, Pakistan, Philippines – Medium risk

Client Types:

- Retail consumers – Medium risk
- Small businesses – Medium risk

3. Control Environment

Key controls in place include:

- Automated transaction monitoring rules
- Sanctions list screening of clients and counterparties
- Enhanced due diligence for high-risk clients
- Segregation of duties between product, operations, and compliance.

4. Residual Risk Rating

After considering the design and implementation of controls, MaplePay's residual AML risk is assessed as:

- Overall: Medium
- International remittances: Medium to High
- Domestic payments: Low to Medium

The current residual risk level is considered acceptable given MaplePay's business model and control framework.

5. Action Plan

The following remediation and enhancement actions are planned for the next 12 months:

- Implement additional machine learning-based anomaly detection for high-risk corridors.
- Increase frequency of sanctions list updates from daily to near real-time.
- Expand staff training with scenario-based workshops.
- Perform independent testing of the AML program by an external firm.

This risk assessment summary is a mock document for demonstration purposes and does not represent a real financial institution.