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**As-Is Process (AML)**

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Process Flow



Ref: AS-IS Process Flow (Visio document)

As-Is Process Summary

The current AS-IS process has been visualized in the Visio attachment provided with this document.

Statement

This As-is process flow demonstrates the Anti Money Laundering Process at present at TD. It follows concepts highlighted in the bank’s AML statement. TD is committed to complying with economic sanctions laws and regulations. (TD, 2020)

Leadership Policies

The policies and procedures are determined after examining the bank’s processes and their interrelationships. These policies are documented. Educating about AML awareness across all levels throughout the organization is mandatory.

Customer Onboarding:

Staff are trained to verify customer details and KYC.

Transaction Processing

If an account is compromised, it requires further monitoring, and data is compared against watchlists. If it is a verified customer, the customer records are maintained and updated as normal, and their transactions proceed as normal. If anything is flagged during monitoring, then those transactions will be compared against the watchlist.

Reporting

If suspicious activity is found, then further risk assessment is conducted, and higher authorities are alerted. If such activities are not found or are reduced, then there is a need to conduct evaluation studies to research the effectiveness of the AML program.

The business areas that get the most affected involve legal and compliance, customer-facing staff, regional management, and risk management teams. Improving the AML process at TD to improve compliance in the United States will require functional changes across some or all of these areas.

# Updated RACI Chart

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Task | Responsible | Accountable | Consulted | Informed |
| Process Flow | Aiswarya, Ashna, Shashwat | Hardik | Hardik | TD |
| Updated RACI | Hardik | Hardik | Ashna | TD |
| Process Summary | Hardik | Hardik | Hardik | TD |
| SRS | Aiswarya, Saurav | Hardik | Ashna | TD |
| Feasibility Analysis | Ashna, Saurav | Hardik | Aiswarya | TD |
| Data Solution | Hardik, Shashwat | Hardik | Ashna | TD |
| Cost Benefit Analysis | Hardik, Ashna | Hardik | Aiswarya | TD |

# References

TD. (2020). AML Statement

<https://www.td.com/document/PDF/ESG/2020-AML-ATF-Sanctions-Statement.pdf>

TD. (n.d.). *About TD – TD Canada Trust*.

<https://www.td.com/ca/en/about-td>