**Client Logo**

**Client Name**

**FINANCIAL CRIME RISK ASSESSMENT (FCRA) REPORT**

For the period from DD/MM/YY to DD/MM/YY

**Table of Contents**

[1. Introduction 4](#_Toc131022696)

[2. Financial Crime Risk Assessment Approach & Methodology 5](#_Toc131022697)

[PART A: MONEY LAUNDERING RISK ASSESSMENT 6](#_Toc131022698)

[3. Executive Summary 6](#_Toc131022699)

[3.1 Enterprise-wide Inherent Risk Ratings 6](#_Toc131022700)

[3.2 Jurisdiction-wise Inherent Risk Ratings 6](#_Toc131022701)

[3.3 Enterprise-wide Control Effectiveness Scores 6](#_Toc131022702)

[3.4 Enterprise-wide Residual Risk Rating 7](#_Toc131022703)

[4. Inherent Risk Assessment – Retail Banking Group (RBG) 7](#_Toc131022704)

[4.1 Mass Market 7](#_Toc131022705)

[4.1.1 Customer Risk 7](#_Toc131022706)

[4.1.2 Products & Services Risk 7](#_Toc131022707)

[4.1.3 Geography Risk 7](#_Toc131022708)

[4.1.4 Channel Risk 8](#_Toc131022709)

[4.1.5 Qualitative Risk Factors 8](#_Toc131022710)

[4.2 Private Banking 8](#_Toc131022711)

[4.2.1 Customer Risk 8](#_Toc131022712)

[4.2.2 Products & Services Risk 8](#_Toc131022713)

[4.2.3 Geography Risk 8](#_Toc131022714)

[4.2.4 Channel Risk 8](#_Toc131022715)

[4.2.5 Qualitative Risk Factors 8](#_Toc131022716)

[5. Inherent Risk Assessment – Corporate Banking Group (CBG) 8](#_Toc131022717)

[5.1 Wholesale Banking 8](#_Toc131022718)

[5.1.1 Customer Risk 8](#_Toc131022719)

[5.1.2 Products & Services Risk 8](#_Toc131022720)

[5.1.3 Geography Risk 9](#_Toc131022721)

[5.1.4 Channel Risk 9](#_Toc131022722)

[5.1.5 Qualitative Risk Factors 9](#_Toc131022723)

[5.2 SME 9](#_Toc131022724)

[5.2.1 Customer Risk 9](#_Toc131022725)

[5.2.2 Products & Services Risk 9](#_Toc131022726)

[5.2.3 Geography Risk 9](#_Toc131022727)

[5.2.4 Channel Risk 9](#_Toc131022728)

[5.2.5 Qualitative Risk Factors 9](#_Toc131022729)

[6. Inherent Risk Assessment – Treasury Banking Group (TBG) 9](#_Toc131022730)

[6.1.1 Customer Risk 9](#_Toc131022731)

[6.1.2 Products & Services Risk 10](#_Toc131022732)

[6.1.3 Geography Risk 10](#_Toc131022733)

[6.1.4 Channel Risk 10](#_Toc131022734)

[6.1.5 Qualitative Risk Factors 10](#_Toc131022735)

[7. Control Environment Assessment 10](#_Toc131022736)

[7.1 Governance and Risk Management 10](#_Toc131022737)

[7.2 Policies and Procedures 10](#_Toc131022738)

[7.3 KYC/CDD/EDD 10](#_Toc131022739)

[7.4 Screening 10](#_Toc131022740)

[7.5 Transaction Monitoring 11](#_Toc131022741)

[7.6 Compliance Assurance & Independent Testing 11](#_Toc131022742)

[7.7 Reporting & MIS 11](#_Toc131022743)

[7.8 Training, Awareness & Record Keeping 11](#_Toc131022744)

[PART B: SANCTIONS RISK ASSESSMENT 11](#_Toc131022745)

[8. Executive Summary 11](#_Toc131022746)

[8.1 Enterprise-wide Inherent Risk Ratings 11](#_Toc131022747)

[8.2 Jurisdiction-wise Inherent Risk Ratings 11](#_Toc131022748)

[8.3 Enterprise-wide Control Effectiveness Scores 11](#_Toc131022749)

[8.4 Enterprise-wide Residual Risk Rating 12](#_Toc131022750)

[9. Inherent Risk Assessment – Retail Banking Group (RBG) 12](#_Toc131022751)

[9.1 Mass Market 12](#_Toc131022752)

[9.1.1 Customer Risk 12](#_Toc131022753)

[9.1.2 Products & Services Risk 12](#_Toc131022754)

[9.1.3 Geography Risk 12](#_Toc131022755)

[9.1.4 Qualitative Risk Factors 13](#_Toc131022756)

[9.2 Private Banking 13](#_Toc131022757)

[9.2.1 Customer Risk 13](#_Toc131022758)

[9.2.2 Products & Services Risk 13](#_Toc131022759)

[9.2.3 Geography Risk 13](#_Toc131022760)

[9.2.4 Qualitative Risk Factors 13](#_Toc131022761)

[10. Inherent Risk Assessment – Corporate Banking Group (CBG) 13](#_Toc131022762)

[10.1 Wholesale Banking 13](#_Toc131022763)

[10.1.1 Customer Risk 13](#_Toc131022764)

[10.1.2 Products & Services Risk 13](#_Toc131022765)

[10.1.3 Geography Risk 13](#_Toc131022766)

[10.1.4 Qualitative Risk Factors 13](#_Toc131022767)

[10.2 SME 14](#_Toc131022768)

[10.2.1 Customer Risk 14](#_Toc131022769)

[10.2.2 Products & Services Risk 14](#_Toc131022770)

[10.2.3 Geography Risk 14](#_Toc131022771)

[10.2.4 Qualitative Risk Factors 14](#_Toc131022772)

[11. Inherent Risk Assessment – Treasury Banking Group (TBG) 14](#_Toc131022773)

[11.1.1 Customer Risk 14](#_Toc131022774)

[11.1.2 Products & Services Risk 14](#_Toc131022775)

[11.1.3 Geography Risk 14](#_Toc131022776)

[11.1.4 Qualitative Risk Factors 14](#_Toc131022777)

[12. Control Environment Assessment 15](#_Toc131022778)

[12.1 Governance and Risk Management 15](#_Toc131022779)

[12.2 Policies and Procedures 15](#_Toc131022780)

[12.3 Name Screening & CDD 15](#_Toc131022781)

[12.4 Payment Screening 15](#_Toc131022782)

[12.5 Employee & Third-Party Screening 15](#_Toc131022783)

[12.6 Compliance Assurance & Independent Testing 16](#_Toc131022784)

[12.7 Reporting & MIS 16](#_Toc131022785)

[12.8 Training, Awareness & Record Keeping 16](#_Toc131022786)

[Appendix 1 – Residual Risk Matrix 16](#_Toc131022787)

# Introduction

# Financial Crime Risk Assessment Approach & Methodology

# PART A: MONEY LAUNDERING RISK ASSESSMENT

# Executive Summary

|  |  |  |  |
| --- | --- | --- | --- |
|  |  |  |  |
|  |  |  |  |
| Risk Factor 14 for Customer 2 | 100.00 | 3.00 | 3.00 |
| Risk Factor 15 for Customer 2 | 100.00 | 2.00 | 2.00 |
| Aggregate Control Assessment Rating | 0 | 0 | 5.00 |

|  |  |  |  |
| --- | --- | --- | --- |
|  |  |  |  |
|  |  |  |  |
| Risk Factor 1 for Customer 2 | 100.00 | 3.00 | 3.00 |
| Risk Factor 9 for Customer 2 | 100.00 | 3.00 | 3.00 |
| Risk Factor 2 for Customer 2 | 100.00 | 3.00 | 3.00 |
| Risk Factor 10 for Customer 2 | 100.00 | 2.00 | 2.00 |
| Risk Factor 3 for Customer 2 | 0.00 | 1.00 | 0.00 |
| Risk Factor 4 for Customer 2 | 100.00 | 1.00 | 1.00 |
| Risk Factor 5 for Customer 2 | 100.00 | 2.00 | 2.00 |
| Aggregate Inherent Risk Assessment Rating | 0 | 0 | 14.00 |

|  |  |
| --- | --- |
|  |  |
| Aggregate Control Assessment Rating | 5.00 |
| Aggregate Inherent Risk Assessment Rating | 14.00 |
| Residual AML Risk Rating | High |

# Inherent Risk Assessment – Retail Banking Group (RBG)

Summary Table:

Commentary:

## Mass Market

### Customer Risk

Summary Table:

Commentary:

### Products & Services Risk

Summary Table:

Commentary:

### Geography Risk

Summary Table:

Commentary:

### Channel Risk

Summary Table:

Commentary:

### Qualitative Risk Factors

Summary Table:

Commentary:

## Private Banking

### Customer Risk

Summary Table:

Commentary:

### Products & Services Risk

Summary Table:

Commentary:

### Geography Risk

Summary Table:

Commentary:

### Channel Risk

Summary Table:

Commentary:

### Qualitative Risk Factors

Summary Table:

Commentary:

# Inherent Risk Assessment – Corporate Banking Group (CBG)

## Wholesale Banking

### Customer Risk

Summary Table:

Commentary:

### Products & Services Risk

Summary Table:

Commentary:

### Geography Risk

Summary Table:

Commentary:

### Channel Risk

Summary Table:

Commentary:

### Qualitative Risk Factors

Summary Table:

Commentary:

## SME

### Customer Risk

Summary Table:

Commentary:

### Products & Services Risk

Summary Table:

Commentary:

### Geography Risk

Summary Table:

Commentary:

### Channel Risk

Summary Table:

Commentary:

### Qualitative Risk Factors

Summary Table:

Commentary:

# Inherent Risk Assessment – Treasury Banking Group (TBG)

### Customer Risk

Summary Table:

Commentary:

### Products & Services Risk

Summary Table:

Commentary:

### Geography Risk

Summary Table:

Commentary:

### Channel Risk

Summary Table:

Commentary:

### Qualitative Risk Factors

Summary Table:

Commentary:

# Control Environment Assessment

## Governance and Risk Management

Summary Table:

Commentary:

## Policies and Procedures

Summary Table:

Commentary:

## KYC/CDD/EDD

Summary Table:

Commentary:

## Screening

Summary Table:

Commentary:

## Transaction Monitoring

Summary Table:

Commentary:

## Compliance Assurance & Independent Testing

Summary Table:

Commentary:

## Reporting & MIS

Summary Table:

Commentary:

## Training, Awareness & Record Keeping

Summary Table:

Commentary:

# PART B: SANCTIONS RISK ASSESSMENT

# Executive Summary

## Enterprise-wide Inherent Risk Ratings

Summary Table:

Commentary:

## Jurisdiction-wise Inherent Risk Ratings

Summary Table:

Commentary:

## Enterprise-wide Control Effectiveness Scores

Summary Table:

Commentary:

## Enterprise-wide Residual Risk Rating

Summary Table:

Commentary:

# Inherent Risk Assessment – Retail Banking Group (RBG)

Summary Table:

Commentary:

## Mass Market

### Customer Risk

Summary Table:

Commentary:

### Products & Services Risk

Summary Table:

Commentary:

### Geography Risk

Summary Table:

Commentary:

### Qualitative Risk Factors

Summary Table:

Commentary:

## Private Banking

### Customer Risk

Summary Table:

Commentary:

### Products & Services Risk

Summary Table:

Commentary:

### Geography Risk

Summary Table:

Commentary:

### Qualitative Risk Factors

Summary Table:

Commentary:

# Inherent Risk Assessment – Corporate Banking Group (CBG)

## Wholesale Banking

### Customer Risk

Summary Table:

Commentary:

### Products & Services Risk

Summary Table:

Commentary:

### Geography Risk

Summary Table:

Commentary:

### Qualitative Risk Factors

Summary Table:

Commentary:

## SME

### Customer Risk

Summary Table:

Commentary:

### Products & Services Risk

Summary Table:

Commentary:

### Geography Risk

Summary Table:

Commentary:

### Qualitative Risk Factors

Summary Table:

Commentary:

# Inherent Risk Assessment – Treasury Banking Group (TBG)

### Customer Risk

Summary Table:

Commentary:

### Products & Services Risk

Summary Table:

Commentary:

### Geography Risk

Summary Table:

Commentary:

### Qualitative Risk Factors

Summary Table:

Commentary:

# Control Environment Assessment

## Governance and Risk Management

Summary Table:

Commentary:

## Policies and Procedures

Summary Table:

Commentary:

## Name Screening & CDD

Summary Table:

Commentary:

## Payment Screening

Summary Table:

Commentary:

## Employee & Third-Party Screening

Summary Table:

Commentary:

## Compliance Assurance & Independent Testing

Summary Table:

Commentary:

## Reporting & MIS

Summary Table:

Commentary:

## Training, Awareness & Record Keeping

Summary Table:

Commentary:

# Appendix 1 – Residual Risk Matrix

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Residual Risk** | | **Inherent Risk** | | |
| **High** | **Medium** | **Low** |
| **Control Environment** | **Adequate** | **Medium** | **Medium** | **Low** |
| **Needs Improvement** | **High** | **Medium** | **Low** |
| **Weak** | **High** | **High** | **Medium** |