

# **SWIFT Compliance**

Gizem Tansu

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Financial Crime Compliance initiatives





# The KYC Registry – A Global Initiative

# **Driven in partnership with leading Financial Institutions**





# The KYC Registry – The five Pillars of Trust



Confidential, user-control access: 2-Level access granting for:

Basic: CDD KYC data and documents including

2017 Wolfsberg Due Diligence Questionnaire

**Extended:** Additional information related to enhanced due diligence EDD



Standardized KYC Baseline

Efficient: All KYC data provided by counterparties available

as electronic data and in same format and structure



**Up-to-date information** 

**Current:** Time-stamped data and diligent update

requirements. Any changes to client data are

communicated to all counterparties in real-time



Data verification by SWIFT

Correct and accurate: All data is time-stamped and verified

and validated by SWIFT compliance professionals



**Cooperative business model** 

Fair: Free upload of own KYC data, free validation and

publication by SWIFT, unlimited number of users

Transparent volume based pricing for consumption and

capped maximum spend



Category	Data field (mix of mandatory, conditional and optional)	Document type
I. Identification of the customer	<ul> <li>Entity names and addresses (legal name, trading name, registered address, operating address)</li> <li>Other entity names and addresses (local versions, previous names, formation address)</li> <li>Legal form</li> <li>Entity information (SIC, NAICS, number of employees)</li> <li>Contact information (phone, fax, website)</li> <li>Registration information (registration number, registering authority, date of incorporation)</li> <li>Regulatory/supervision information (status, regulatory/supervisory authority, licence information)</li> </ul>	<ul> <li>Proof of regulation (if applicable)</li> <li>Business licence or official authorisation to conduct financial business (if applicable)</li> <li>Proof of set-up/establishment (if applicable)</li> <li>Extract from registers or proof of existence</li> <li>Certificate of incorporation (if no extract)</li> <li>Certificate of change of name (if change(s) of name within the last 5 years)</li> <li>Proof of address (if not available in other documents)</li> <li>Other</li> </ul>
II. Ownership and management structure	<ul> <li>Ownership type (form of organisation, stock exchange listing)</li> <li>Bearer shares information (if applicable)</li> <li>Shareholding entities – Threshold 10% (names and details) <ul> <li>Trust &amp; Foundation (address, Settlor, Trustee, beneficiaries, purpose)</li> </ul> </li> <li>Ultimate Beneficial Owners – Threshold 10% (names and details)</li> <li>Management structure: Board of Directors, Executive Management, Supervisory Board (names and details)</li> <li>Auditor of annual report</li> <li>Key financial data (revenue, asset size, size of the capital, source of wealth of the business)</li> </ul>	<ul> <li>Memorandum and/or Articles of Association</li> <li>Ownership structure</li> <li>Documentary proof of shareholding companies</li> <li>Declaration of Ultimate Beneficial Owners</li> <li>List of shareholders</li> <li>Board of directors</li> <li>List of senior/executive management</li> <li>Supervisory/non-executive Board (if applicable)</li> <li>Sharia Board (if applicable)</li> <li>Audited annual report</li> <li>Audited key financial statements (if no annual report)</li> <li>Functional organisational chart</li> <li>Proof of identity of UBOs and key controllers</li> <li>Proof of permanent residence of UBOs and key controllers</li> <li>Documentary evidence of source of wealth</li> <li>Proof of listing of the shareholding entity (if applicable)</li> <li>Proof of regulation of the shareholding entity (if applicable)</li> <li>List of authorised signatories</li> <li>Proof of stock exchange trading (if applicable)</li> <li>Other</li> </ul>



Category	Data field (mix of mandatory, conditional and optional)	Document type
III. Type of business and client base	<ul> <li>Type of products and services offered (cash services, correspondent clearing services, downstream/nested correspondent clearing services, payable-through accounts, anonymous accounts, wire transfers, distribution channel)</li> <li>Type of clients (segmentation and %, details about domestic and foreign banks, shell banks, offshore clients, MSB clients, virtual currency exchange, Payment Service Providers, gambling companies, non-accounts customers,</li> <li>Geographical presence</li> <li>Geographical customer base</li> <li>Sanctions (details about current/future presence or activity with countries subject to comprehensive sanctions including exposure)</li> </ul>	• Other
IV. Compliance	<ul> <li>Contact details (MLRO, Chief Compliance Officer, AML contact)</li> <li>AML questionnaire including Wolfsberg 2017 Due Diligence questionnaire <ul> <li>AML &amp; Sanctions programme</li> <li>Anti-Bribery &amp; Corruption (ABC)</li> <li>Policies &amp; Procedures</li> <li>AML &amp; Sanctions Risk Assessment</li> <li>KYC, CDD and EDD</li> <li>Monitoring &amp; Reporting</li> <li>Payments Transparency</li> <li>Sanctions</li> <li>Training &amp; Education</li> <li>Quality Assurance / Compliance Testing</li> <li>Audit</li> </ul> </li> </ul>	<ul> <li>Wolfsberg Group AML Questionnaire 2014 completed or equivalent</li> <li>Wolfsberg Group Due Diligence Questionnaire 2017</li> <li>Summary of AML policies/procedures or AML laws</li> <li>Detailed AML policies and procedures</li> <li>AML questionnaire of the entity (template)</li> <li>USA Patriot Act Certification completed (if applicable)</li> <li>MiFID questionnaire of the entity (template)</li> <li>Organisational chart of the Compliance department</li> <li>Response to negative statement from the press</li> <li>ISSA Financial Crime Compliance Questionnaire completed</li> <li>Bio of the MLRO</li> <li>Bio of the Chief Compliance Officer</li> <li>Other</li> </ul>
V. Tax	<ul> <li>FATCA (status and classification, GIIN, contact)</li> <li>CRS (status, contact)</li> <li>Tax identification number and tax countries</li> </ul>	<ul> <li>FATCA form completed (W-8 BEN-E or W-9, W-ECI, W-8IMY or W-8EXP)</li> <li>CRS self-certification form completed</li> <li>Other</li> </ul>



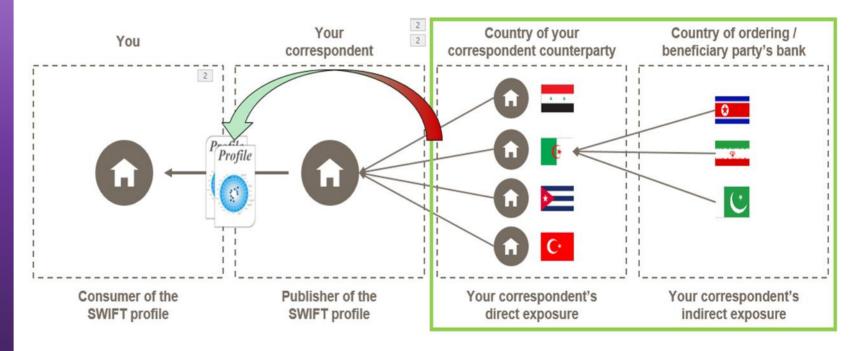
#### YOU ARE IN CONTROL ARAB BANK-SYRIA Head Office / Subsidiary To access CDD/EDD Notify me when this entity joins Invite this entity to join This entity is not using the KYC Registry ■ Who access my 1 Invite this entity to join The KYC Registry documentation? **Identification of Customer** Please invite a representative of the institution who can potentially support that the institution joins The KYC Registry What I'm notified for? Contact name 1 ■ News feed Anglicised legal name: ARAB BANK-SYRIA Message from SWIFT: Trading name: ARAB BANK-SYRIA Dear Business Partner. s inviting your institution to join The KYC F 1 V. Registered address: Al Mahdi bin Barakh street of The KYC Registry and prefers to use this platform as a better alternative to the traditional exchange of conjugational KYC related data and Damascus Syrian Arab Republic (SY) Membership of The KYC Registry allows your institution to upload its KYC related data and documents onto SWIFT's KYC platform and to share this information with selected business partners at the sole discretion of your institution. Your KYC data and documents will be verified by SWIFT at no cost to your institution and will only be published once you and SWIFT agree that the published data represents a true and fair view of your institution. As a member of The KYC Registry, you may also use the platform to request access to SWIFT-validated KYC data provided by other institutions. Invite the missing counterparty to join Should you not be involved in the management of your firm's KYC process, we would be grateful if you could pass-on this message to the The KYC Registry Learn more about the The KYC Registry and the benefits your membership can generate for your institution. To sign-up, please click here. Message from your counterparty: You will be notified once they join



## **TRUSTWORTHY**

- SWIFT reviews all doc against regulatory/public resources & flag the docs
- ☐ Your data is NOT a PUBLIC DOMAIN!
- ☐ English version of Docs
- Version history
- Adverse media option
- ☐ SWIFT profile

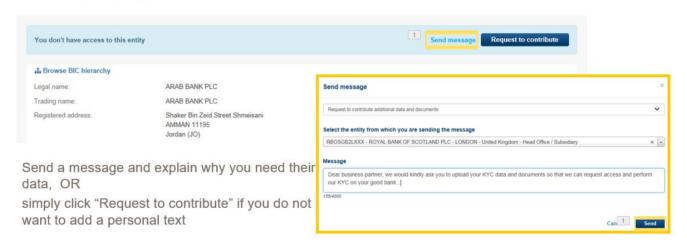
# Add-on: The SWIFT Traffic Profile, addressing 'KYCC'



# Easy contact & no chasing

- In-chat messaging
- No reply to your request- SWIFT is contacting the bank for you

# ARAB BANK PLC Head Office / Subsidiary BIC: ARABJOAXXXX | Location: AMMAN, Jordan



You will be informed once data has been provided

## YOU ARE IN CONTROL

- To access CDD/EDD
- Who access my documentation?
- What I'm notified for?
- News feed

## **TRUSTWORTHY**

- ☐ SWIFT reviews all doc against regulatory/public resources & flag the docs
- ☐ English version of Docs
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- Version history
- □ Adverse media option
- ☐ SWIFT profile

# Easy contact & no chasing

- ☐ In-chat messaging
- No reply to your request- SWIFT is contacting the bank for you

# Done by community for the community

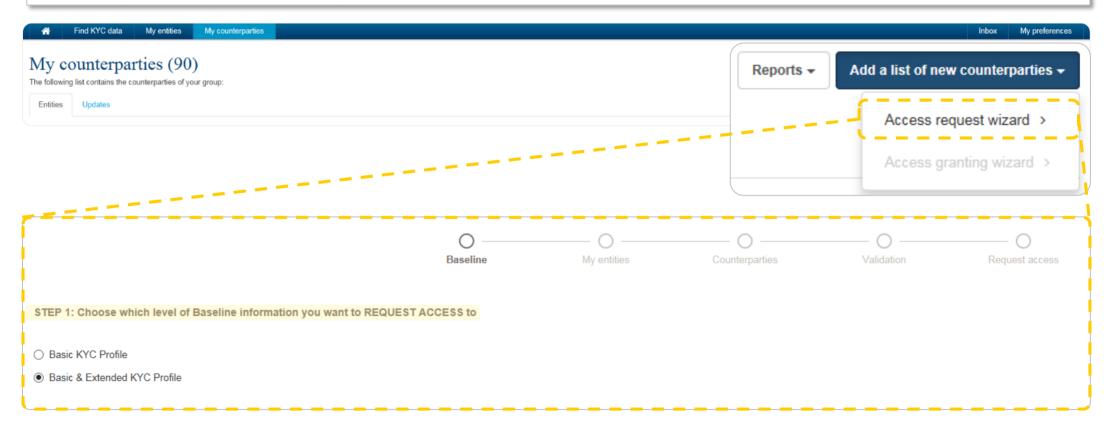
- No limitation for the amount of users and the PCs
- ☐ Registration &publication of docs are FREE
- ☐ You pay what you consume
- Invoice is capped
- ☐ You can fix the price!

# **FLASH NEWS!**

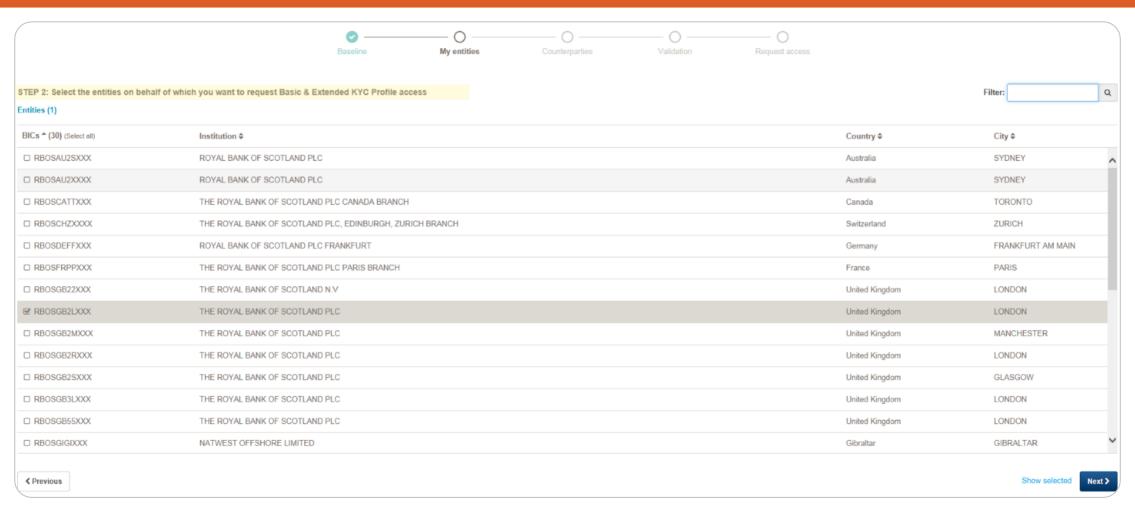
- 1- You worry it will be time consuming to upload all the documents? We can prepopulate the information for you (up to 50 %)
- 2- Do you think it is time consuming to access the banks info 1 per 1? Try the bulk access request!
- 3- Do you think KYC will not reduce the time spent on CDD exchanges?
- Check out the case study from HSBC- it reduces 72 %
- 4- You are subscribed but you don't know how to use the registry? Check SWIFT smart training or we organize one online for you!



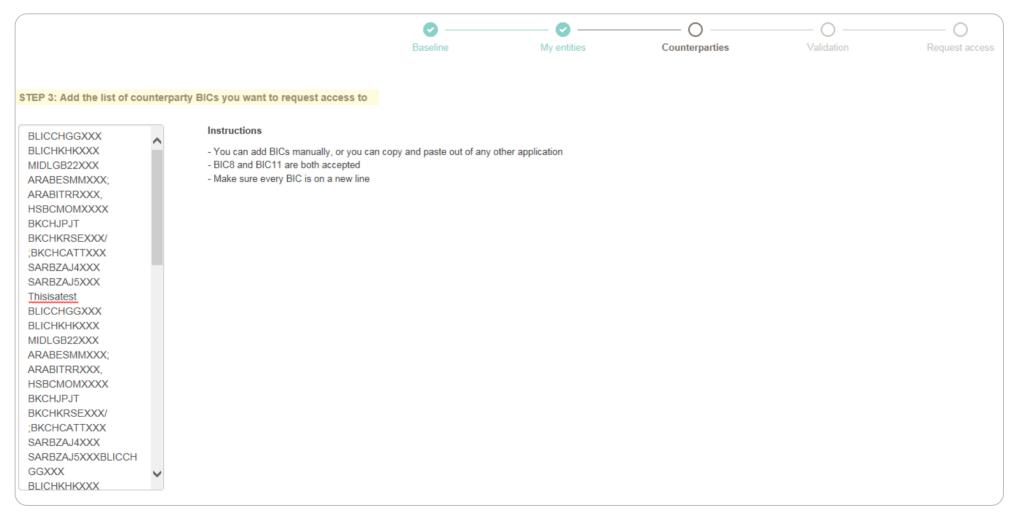
Multi-steps wizards to allow Requester users to request access in bulk



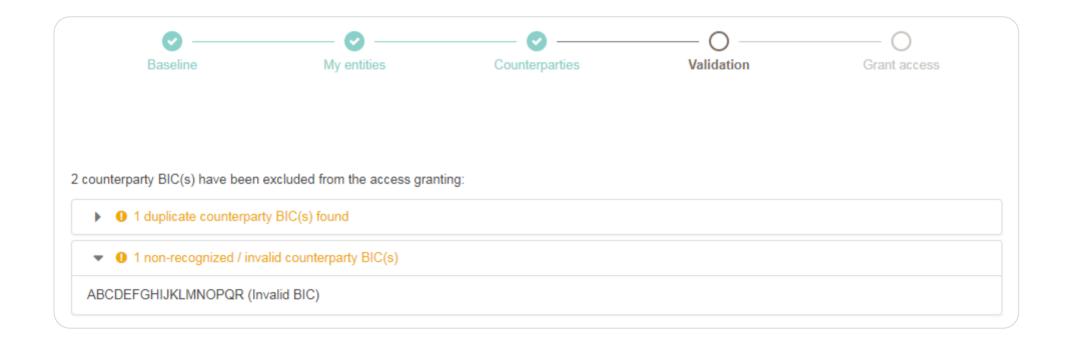


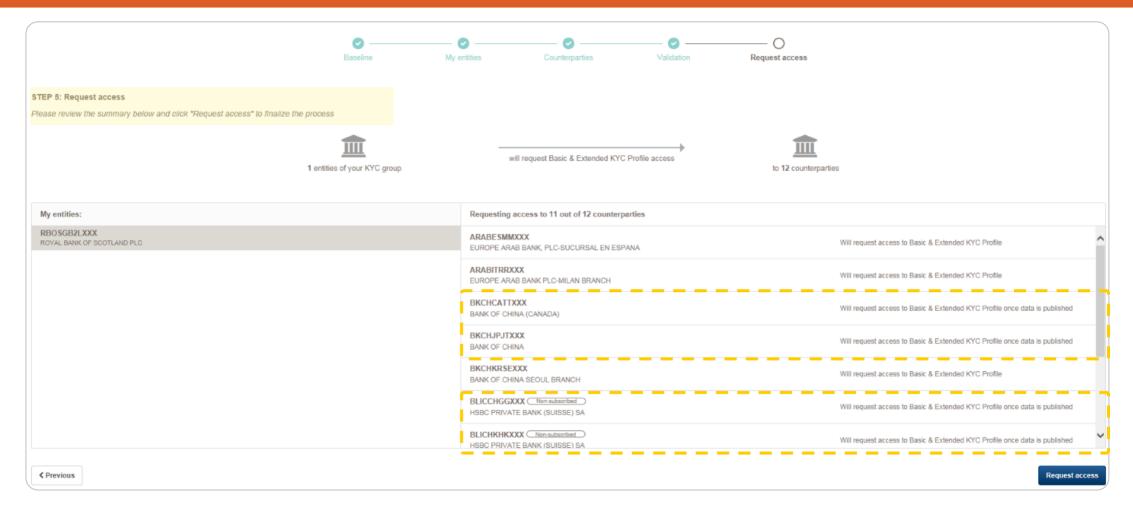
















# **Sanctions Screening**

\*How do you filter your transactions?





# Sanctions screening over SWIFT



- Screening engine & user interface
- Centrally hosted and operated by SWIFT
- No local software installation & integration
- Real-time
- Sanctions List update service



# **Public Sanctions lists available**

45

Public sanctions lists updated by SWIFT daily

# Private lists & Good-guys lists managed

by the users

**AND** 

4 Research-based ownership lists

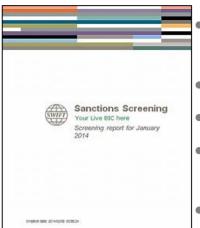
SWIFT-FCC-2018\_update

Country	Description				
Australia	Department of Foreign Affairs and Trade (DFAT)				
	DFAT Autonomous list				
	DFAT Country Embargoes				
Canada	Office of the Superintendent of F.I. (OFSI)				
	OSFI - United Nations Act Sanctions				
	Department of Foreign Affairs and Trade (DFAIT)				
	DFAIT Countries Embargoes				
European Union	European Official Journal				
	EU Countries Embargoes				
	EU Ukraine Restrictive Measures				
France	Journal Officiel français				
Hong Kong	Hong Kong Monetary Authority (HKMA)				
	HKMA Countries Embargoes				
Japan	Ministry of Finance				
	Special Measures				
Netherlands	Frozen Assets List - Dutch Government				
New Zealand	New Zealand Police				
China	Ministry of Public Security of the PRC				
Ukraine	State Financial Monitoring Service of Ukraine				
	National Security and Defense Council				

Country	Description						
Norway	Ministry of Foreign Affairs (MFA) list						
	MFA United Nations list						
	MFA Countries Embargoes						
Singapore	Monetary Authority of Singapore - Investor Alert List						
	Terrorism (Suppression of Financing) Act						
Switzerland	Secrétariat d'Etat à l'Economie						
	SECO Countries Embargoes						
United	Her Majesty's Treasury						
Kingdom	HMT Countries Embargoes						
	HMT Ukraine Restrictive Measures						
United Nations	United Nations						
	UN Countries Embargoes						
United States	Financial Crimes Enforcement Network (FINCEN)						
of America	OFAC Specially Designated Nationals						
	OFAC Embargoed Countries						
	OFAC non-Specially Designated Nationals, including:  OFAC Palestinian Legislative Council  OFAC Part 561  OFAC Foreign Sanctions Evaders  OFAC Sectoral Sanctions Identifications  OFAC Non-SDN Iranian Sanctions Act						

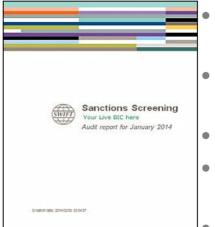
# Report tools:

# **Screening Report**



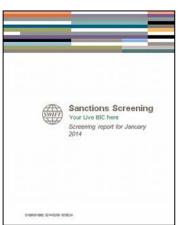
- Copy of each alerted transaction
- Hit details
- Final status
- Monthly (to be saved and stored)
- rtf & XML format

# **Audit Report:**



- Audit log of all transactions screened
- Audit log of all operators activity and decisions
- Comments
- Monthly and weekly (since July 2016)
- Rtf format

# **Quality assurance Report**



- Annual quality assurance checks on effectiveness of the service
- Verifies that lists used mirror regulatory sources
- Measures exact and fuzzy matching capabilities
- Provides details on filter configuration and related impact
- Upon request



# **Sanctions Screening: Implementation options**

	Copy option	Connectors option				
	Your institution Your correspondent	Your institution Your correspondent	-			
			Query/response of all transaction types through API call to the service			
	Transparent routing of FIN transactions to the service using FIN-Copy	Connector on Lite2	Screen or Screen and Send mode  Connector on SAA			
Timeframe Time to compliance	Few weeks for prod One month min	F	ew Months			
Footprint Installation & integration	Zero*	Limited (SIL and BO integration)	Limited (IPLA in SAA)			
Flexibility  Granularity on what is filtered	Limited	Unlimited (folder based configuration)	Unlimited (routing inherited from SAA)			
Scope Transactions Screened	All cat beside cat8		transaction types* les and any formats**			





# Name Screening with Sanctions & PEPs



# Introducing...

# **SWIFT's Name Screening Service**

# Single name & Batch Screening

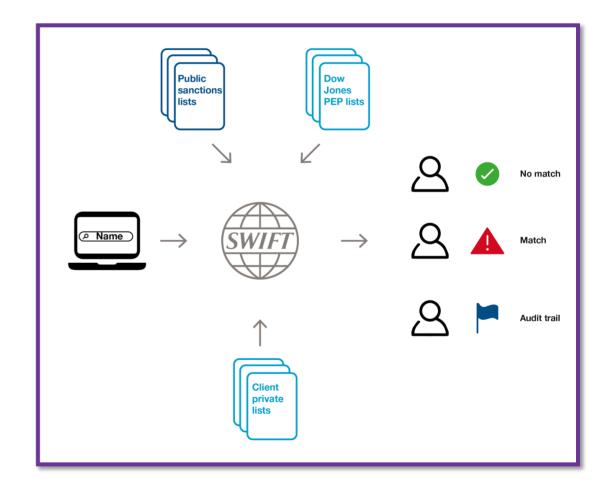
- Simply screen databases of individuals & companies
  - > Built-in Workflow, Audit

Understand The Risk:
Sanctions
Sanctions Ownership Research
Politically Exposed Persons

In partnership with:

**Relatives & Close Associates** 

DOW JONES



# **SWIFT Name Screening Service**

Single Name and Batch Screening

# **List Scope Detail**

		Lists	Details			
	Politically Exposed Persons	<ul> <li>PEP - Level 1 International Political:</li> <li>PEP - Level 2 International Non Political</li> <li>PEP - Level 3 National</li> <li>PEP - Level 4 Other</li> </ul>	<ul> <li>23 Job Categories Unique to Dow Jones</li> <li>Coverage Guided by international regulation &amp; guidance since 2002</li> <li>7 of the 13 members of the Wolfsberg Group use these DJ PEP lists</li> <li>Active &amp; Inactive PEPs</li> </ul>			
vo	Relatives and close Associate	<ul> <li>RCA – Level 1</li> <li>RCA – Level 2</li> <li>RCA – Level 3</li> <li>RCA – Level 4</li> </ul>	<ul> <li>PEP links to RCAs can expose significant risk</li> <li>Primary focus for DJ's market leading coverage</li> <li>40 categories of relatives and close associates</li> </ul>			
Jones List		<ul> <li>OFAC Ukraine-related enrichments - Majority owned</li> <li>OFAC other programs-related enrichments - Majority owned</li> <li>OFAC Ukraine-related enrichments - Minority owned</li> <li>OFAC other programs-related enrichments - Minority owned</li> <li>OFAC all programs-related enrichments - all programs-related enrichments - Former</li> </ul>	All companies sanctioned by the OFAC and EU Sanction programs in which a sanctions target (e.g. designated by the U.S., the U.K. or EU			
Dow	Sanctions Ownership Research	<ul> <li>EU Majority and Affiliation Ukraine-related enrichments - Majority owned</li> <li>EU Majority and Affiliation other programs-related enrichments - Majority owned</li> <li>EU Majority and Affiliation Ukraine-related enrichments - Minority owned</li> <li>EU Majority and Affiliation other programs-related enrichments - Minority owned</li> <li>EU Majority and Affiliation all programs-related enrichments - Former</li> </ul>	sanctions program) owns a minimum stake of 10% of the company or where an explicitly named sanctioned individual has a possible controlling interest (either as a member of the board or as a senior executive).  • Over 10,000 entities identified in more than 80 countries			



Politically Exposed Persons Relatives & Close Associates Sanctions Ownership

Other Official Lists (e.g. FBI)\* Adverse Media\*

\* Coming Soon

#### **Private Lists**

- · Managed by the client
- Multiple lists each with 10,000 entities (i.e. 1 list per Business Unit)

#### **Sanctions Lists by SWIFT**

- Monitored
- Validated
- Enriched
- Standardised









SWIFT

# **SWIFT Name Screening Service**

Single Name and Batch Screening

# **List Scope Detail**

		Lists
Lists	US	Office of Foreign Asset Control – SDN  OFAC Non-SDN / PLC  OFAC non-SDN / part 561  OFAC non-SDN / FSE  OFAC non-SDN / SSI  OFAC non-SDN / NS-ISA  Financial Crime Enforcement Network
	CA	<ul> <li>Office of the Superintendent of Financial Institutions - United Nations Resolution on Iran:         <ul> <li>OSFI – United Nations Act sanctions – Individuals</li> <li>OSFI – United Nations Act sanctions – Entities</li> </ul> </li> <li>Office of the Superintendent of Financial Institutions:         <ul> <li>OSFI – Individuals</li> <li>SFI – Entities</li> </ul> </li> </ul>
ns	UN	United Nations
Sanctions Lists	EMEA	<ul> <li>European Official Journal XML</li> <li>EU Ukraine restrictive measures</li> <li>Her Majesty's Treasury (GB HMT)</li> <li>HMT Ukraine restrictive measures (GB HMT)</li> <li>Secretariat d'Etat à l'Economie (CH SECO)</li> <li>Journal Officiel Francais</li> <li>State Financial Monitoring Service of Ukraine</li> <li>Government of the Netherlands - National terrorism list (Frozen asset list)*</li> <li>Norway Ministry of Foreign Affairs - United Sanctions Resolutions*</li> <li>Norway Ministry of Foreign Affairs *</li> </ul>
	APAC	<ul> <li>Australian Government - Department of Foreign Affairs and Trade sanctions list</li> <li>Hong Kong Monetary Authority</li> <li>Monetary Authority of Singapore - Investor Alert List</li> <li>Monetary Authority of Singapore - Terrorism (suppression of Financing) Act</li> <li>New Zealand Police</li> </ul>



Politically Exposed Persons Relatives & Close Associates Sanctions Ownership

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SWIFT

**SWIFT Name Screening Service** Single Name and Batch Screening Lists of: Your institution private Multiple lists each with 10,000 entities **Databases Client Databases** API Batch Screening\* Corporate Customers **Delta Screening** Retail Customers Screening Engine Single Entity Screening Case management via GUI Results User(s) Interface authenticated via Secure Tokens SWIFT-FCC-2018 update \*ComQ1 2018, up to 10 Millions records



Politically Exposed Persons Relatives & Close Associates Sanctions Ownership

Other Official Lists (e.g. FBI)\* Adverse Media\* \* Coming Soon

#### Sanctions Lists by SWIFT

- Monitored
- Validated
- Enriched
- Standardised











Few weeks

Zero

#### Scope Formats screened

**SWIFT Predefined** Format

System performance Batch volume limitation

Up to 25 million records

# Branch A Business Unit 1 Level 1 Level 2

# **SWIFT Name Screening Service Configuration**

# **Screening Group 1**



Branch A Retail Customers Screening Configuration

- Lists
   Match Elimination
- Thresholds



# **Screening Group 2**



Branch B Retail Customers Screening Configuration

- Lists
- Match Elimination
- Thresholds

# **Screening Group 3**



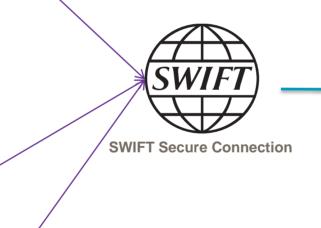
Level 2

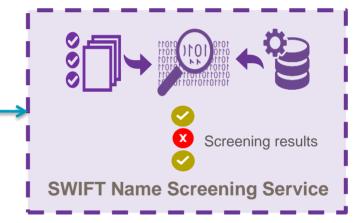
Branch B Retail Customers



Branch B Corporate UBOs Screening Configuration

- Lists
- Match Elimination
- Thresholds







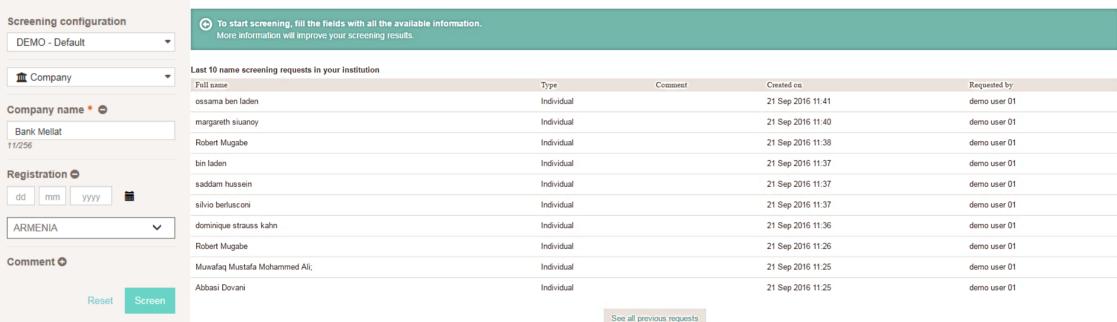
Level 1

# Screen name

# Check results Investigate alert

# **Keep track**

#### Name screening



#### Citizenship O

#### Comment O

Ownership structure of Internal and 2018 update Stone Comany Ltd

# Screen name

# Check results Investigate alert

# Keep track

anie screening							
creening configuration  DEMO - Default	4 potential matches	on your screening input	Д Create SANCTIONS alert	Create PEP alert			
DEMO - Default	1. LAURENT NKUNDA		UN Sec	curity Council (SANCTIONS) - Profile 6908	▲ Mismatched: Gender	Score: 95	
Individual ▼	Туре	Quality	First name	Last name	Full name		
	PRIMARY		LAURENT	NKUNDA			
lame * •	AKA	STRONG			Laurent Nkur	ında Bwatare	
Lauren	◆ Show all 9 names						
Nkunda Bwatare	Birth:	Rutshuru North Kivu DRC					
+0	Dirth.	06 Feb 1967					
Lauren Nkunda Bwatare		02 Feb 1967					
1/256	Gender:	Male A MISMATCHED					
Sender * 🖨	Nationality:	Congolese					
Male Female Unknown	Remarks:	Former RCD-G General. Foun show more	nder, National Congress for the People's De	fense, 2006; Senior Officer, Rally for Cong	olese Democracy-Goma (RCD-G), 1998-2	2006	
birth 🔾							
03 02 1967	2. Laurent Nkunda Mih	iigo	Europe	an Official Journal (SANCTIONS) - Profile	3192	▲ Mismatched: Gender	Score: 95
CONGO, THE DEMOCRATIC REPUB ▼	3. Laurent Nkunda		Dow Jo	ones Politically Exposed Persons - Level 4	Other - Active (PEP) - Profile 654893	▲ Mismatched: Gender, Date of birth	Score: 95
City	4. Laurent NKUNDA		Her Ma	ijesty's Treasury (SANCTIONS) - Profile 87	710		Score: 95
lace of residence 🖨							
RWANDA •							
City							
Address							

52/256

Citizenship O

Comment 🖨

Stone Comany Ltd

Ownership structure/httlfillelas@nd2018\_update

# Screen name

# **Check results**

# Investigate alert

99

# Keep track

19 Sep 2016 16:48

DEMO

DJ-PEP-L1-INTL-POL-A

## Alert manager

All alerts	294	29 of 294 aler	ts are shown					<b>●</b> Comment	Assign to Assign to m	ne I₄ Sorting ▼ Manage	filters	ns Save current view
Andronal		Alert ID 🔻	Type 🔻	Alert type ▼	# matches <b>T</b>	State <b>T</b>	Name <b>T</b>		Best match score ▼	Best match list name ▼	Created on \(\mathbb{T}\)\frac{1}{A}	Business unit ▼
Assigned to me	0	1007487	Company	SANCTIONS	3	Open	mellat bank		99	US-OFAC-SDN	19 Sep 2016 22:22	DEMO
Shared views		1007485	Company	SANCTIONS	3	Open	cimex		99	US-OFAC-SDN	19 Sep 2016 22:05	DEMO
Domestic - Wealthy	2	1007484	Company	SANCTIONS	3	Open	cimex		99	US-OFAC-SDN	19 Sep 2016 22:04	DEMO
PEP only	0	1007482	Company	SANCTIONS	14	Open	AL-AQSA		99	US-OFAC-SDN	19 Sep 2016 21:51	DEMO
Sanctions only	29	1007480	Individual	SANCTIONS	1	Proposed False Positive	laurencea nkundaa bwatarea		82	DJ-PEP-L4-OTHER-A	19 Sep 2016 19:59	DEMO
		1007479	Individual	SANCTIONS	1	Open	laurencea nkundaa bwatarea		82	DJ-PEP-L4-OTHER-A	19 Sep 2016 19:58	DEMO
Personal views		1007271	Individual	SANCTIONS	1	Open	Laurente nknudaa		81	DJ-PEP-L4-OTHER-A	19 Sep 2016 19:58	DEMO
Personal view #1	0	1007328	Company	SANCTIONS	13	L1 Investigate	AL-AQSA		99	US-OFAC-SDN	19 Sep 2016 18:06	DEMO
Personal view #2	29	1007326	Individual	SANCTIONS	1	Open	AL-ARORI Salih		83	DJ-PEP-L1-INTL-POL-A	19 Sep 2016 17:14	DEMO
☼ Manage your views		1007327	Individual	SANCTIONS	1	Open	AL-ARORI Salih		99	US-OFAC-SDN	19 Sep 2016 17:13	DEMO
- manage feet none		1007325	Individual	SANCTIONS	2	Open	AL-ARMANAZI, Amr Muhamm	nad Najib	99	EU-CSFP	19 Sep 2016 17:12	DEMO
You modified the 'Sanction only' view		1007324	Company	SANCTIONS	13	Open	AL-AQSA		99	US-OFAC-SDN	19 Sep 2016 17:11	DEMO
Reset view   Update view   Create nev	w view	1007323	Individual	SANCTIONS	3	True Match	lauren nkunda bwatare		95	UN-SC	19 Sep 2016 16:57	DEMO
		1007319	Individual	SANCTIONS	1	Open	laurencea nkundaa bwatarea		82	DJ-PEP-L4-OTHER-A	19 Sep 2016 16:51	DEMO
		1007318	Individual	SANCTIONS	1	Open	Juozas Gudaitis		99	DJ-PEP-L1-INTL-POL-I	19 Sep 2016 16:50	DEMO
		1007285	Individual	SANCTIONS	1	False Positive	laurencea nkundaa bwatarea		82	DJ-PEP-L4-OTHER-A	19 Sep 2016 16:50	DEMO
		1007316	Individual	SANCTIONS	641	Open	Abdul Rehman		99	DJ-PEP-L1-INTL-POL-I	19 Sep 2016 16:50	DEMO
		1007317	Individual	SANCTIONS	36	Open	Abdul Rehman		99	EU-CSFP	19 Sep 2016 16:50	DEMO
		1007315	Company	SANCTIONS	3	Open	Mellat bank		99	US-OFAC-SDN	19 Sep 2016 16:49	DEMO

Robert mugabe

Individual

SANCTIONS

2

Open

1007313

## Screen name

# Check results

# Investigate alert

# Keep track

demo user 1 DEMO



Abdul Rehman Eylenbosch

Alert 1000012 - SANCTIONS

Alert manager

Abdul Rehman

Alert 1000053 - PEP

saddham hussein

Alert 1000006 - PEP

Alert 1000002 - PEP

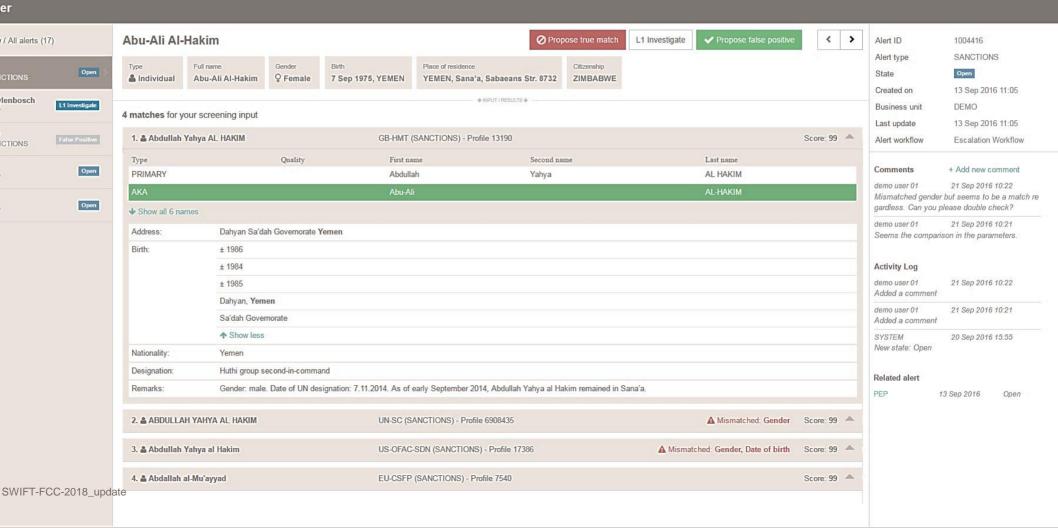
john cribbin

john cribbin

ome Name screening •

Aler

Administration





# **Fraud Prevention**

Detect I Prevent I Validate

# **SWIFT's Customer Security Programme**

# **Customer Security Programme (CSP)**

Launched in May 2016, the CSP supports all customer segments in reinforcing the security of their local SWIFT-related infrastructure

# Your Community

**Share and Prepare** Intelligence Sharing SWIFT ISAC Portal



# Your Counterparts

Prevent and Detect
Transaction Pattern
Detection –
RMA, DVR and 'In Flight'
Payment Controls



## The attacks on SWIFT customers have all followed the same Modus Operandi

- Attackers are wellorganised and sophisticated
- There is (still) no evidence that SWIFT's network, core messaging services or OPCs have been compromised
- All Indicator of compromise details are published on the SWIFT Information Sharing and Analysis Centers (ISAC) portal

Step 1
Attackers
compromise
customer's
environment

Step 2
Attackers
obtain valid
operator
credentials

Step 3
Attackers
submit
fraudulent
messages

Attackers hide the evidence

Step 4

The Evolving Cyber Threat to the Banking Community

- Malware injected by e-mail phishing, USB device, rogue URL or insider
- Long reconnaissance period monitoring banks' back office processes
- Keylogging / screenshot malware looking for valid account ID and password credentials
- Attacker impersonate the operator / approver and submits fraudulent payment instructions
- May happen outside the normal bank working hours / over public holiday

### Gain time by:

- Deleting or manipulating records / log used in reconciliation
- Wiping Master Boot Record



## Challenges the industry faces

Insider fraud: where back-office compromise allows fraudulent payments to be sent.

Without adequate controls banks face:

Fraud Risks Reputational Risks

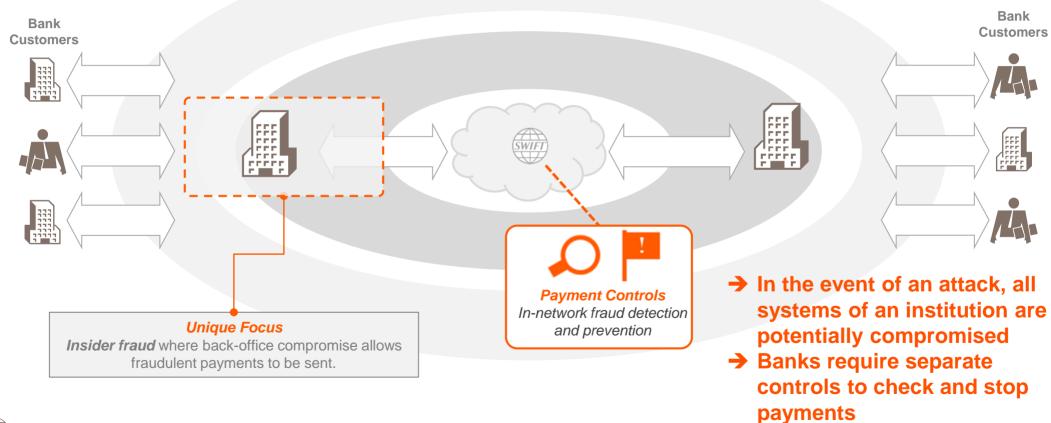
Loss of Trust



## **CSP** | Tackling payment fraud

# New type of fraud

Fraud is increasingly sophisticated and patterns are changing – moving from data theft to payment fraud "Financial institutions and payment infrastructures are the new targets" \*



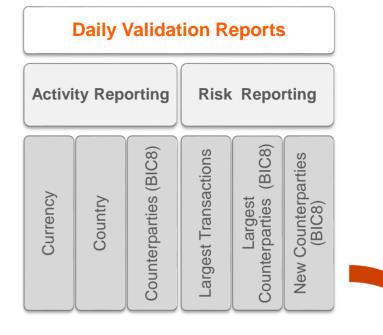
SWIFT-FCC-2018\_update

# **REPORTING MODULE: Daily Validation Reports**

**Activity Reporting** – reports aggregate daily activity by message type, currency, country and counterparties with daily volume and value totals, maximum value of single transactions and comparisons to daily volume and value averages

**Risk Reporting -** highlights large or unusual message flows based on ordered lists for largest single transactions and largest aggregate transactions for counterparties, and a report on new combinations of counterparties to identify new relationships





### **New Counterparties Reporting -**

highlights any new combinations of direct and indirect counterparties. Makes it easy to identify new payment relationships that may be indicative of risk, and helps you quickly understand the values and volumes of the transactions involved

# **Daily Validation Reports - Homepage**



#### **Daily Validation Reports**

Documentation & Support

DEMOGBXX

30 Nov 2016

### **Activity Reports**

Validate you daily inbound or outbound traffic

View aggregate daily activity, maximum value of single transactions and comparison to daily averages

#### View your outbound activity >>

Message type	Messages sent	Average amount sent (converted)
MT103	2,009	372,823,991.20
MT202	1,215	58,647,655,890.27
MT202C	312	20,515,310.80

USD

USD

#### View your inbound activity >>

Message type	Messages received	Amount received (converted)
MT103	1,834	300,709,597.31
MT202	530	22,484,895,559.08
MT202C	134	2,793,031.03

## Risk Reports

Highlight large or uncharacteristic payments flow and identify new relationship combinations

#### View your outbound risk >>

Message type	Currency	Largest transaction sent			
MT103	SGD	739,424,841.75			
MT202	SGD	44,653,129,171.48			
MT202C	DKK	22,924,859.17			

58

new relationships

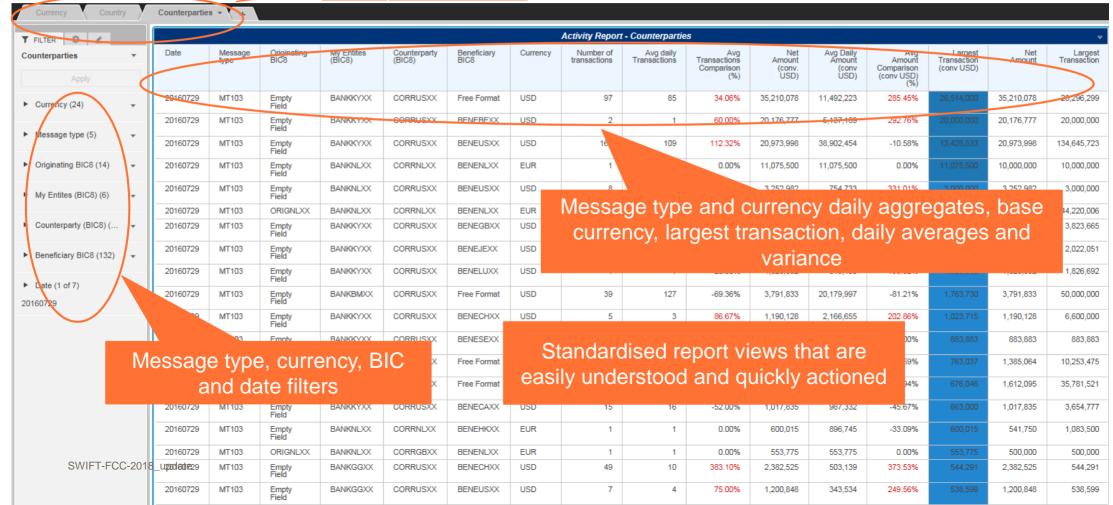
#### View your inbound risk >>

Message type	Currency	Largest transaction received
MT103	SGD	158,142,384.34
MT202	SGD	22,061,577,176.42
MT202C	DKK	8,294,917.02

41 new relationships

## Daily Validation Reports - Simple, standard, easily understood and powerful reporting

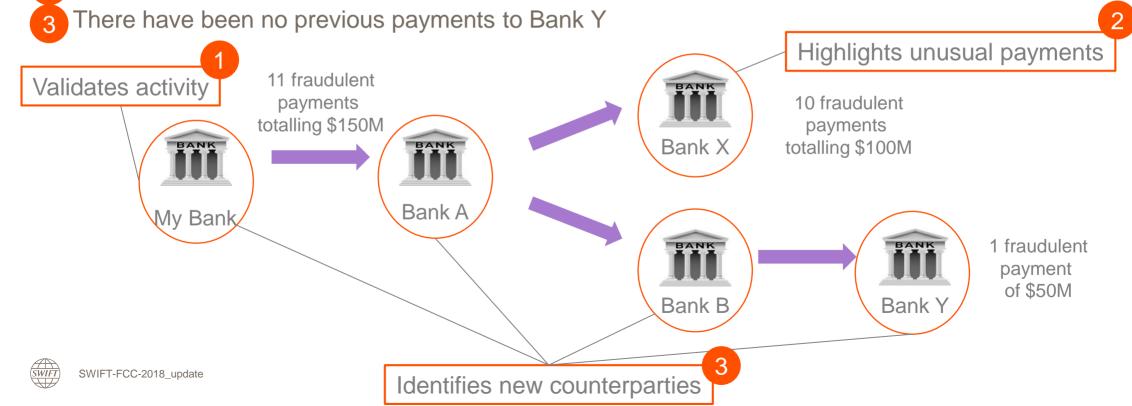
User selectable report views



Attackers gain access to the back office systems of "My Bank" and send fraudulent payments.

A total of \$150M in fraud is sent from "My Bank" to accounts in Bank X (\$100M) and Bank Y (\$50M).

- 1 Statements are intercepted by malware in My Bank's environment payment records are wrong!
- 2 Payments to Bank X are uncharacteristic, values are usually lower!



# Validates your daily traffic

PILTER ST. V	Activity Report - Currency											
urrency	Date	Message type	Currency	Number of transactions	Avg Daily Transactions	Avg Transactions Comparison (in %)	Net Amount (conv. USD)	Avg Daily Amount (conv USD)	Avg Amount Comparison (%)	Largest Transaction (conv. USD)	Net Amount	Large: Transactio
Apply	20160729	MT103	USD	750	833	-9.98%	186,371,141	101,114,172	84.32%	28,000,000	106,371,141	28,000,00
Chhil	20160729	MT103	EUR	182	142	28.30%	113,070,568	73,902,903	53.00%	11,392,194	20,830,273	10,285,9
Currency (24)	20160729	MT103	GBP	144	207	-30.48%	2,308,947	56,937,929	-95.94%	664,800	1,753,853	504,
``	2160729	MT103	CAD	25	43	-42.47%	253,527	6,985,900	-96.37%	156,162	333,540	205,
Message type (5)	1729	MT103	CHF	4	13	-68.18%	80,759	2,671,100	-96.98%	48,080	79,216	47,
_		MT103	BMD	21	16	32.63%	20,433	11	-99.82%	12,607	20,433	12,
Date (1 of 8)	Cur	roncy	,	1	6	-82.50%	5,7				7,663	7,
160729	Currency		1	2	-37.50%	3	Hiah v	ariation i	in traffic	564		
100120	ro	port		89	111	-19.61%	24,430,9	_			058,547	21,565,
	10	ρυπ		1	1	0.00%	212,4	compared	to avera	age – dog	640,167	640,
	20160729	MT103+	USD	38	48	-20.60%	270,9	•			270,923	47,
	20160729	MT103+	CAD	3	2	80.00%	83,3	not r	natch re	cords!	109,649	59,
	20160729	MT103+	GBP	16	15	6.67%	56,1				42,668	18,
	20160729	MT103+	ANG	1	1	0.00%	23,796	486,601	-95.11%	23,796	42,833	42,
	20160729	MT103+	CHF	4	4	-6.67%	5,792	106,765	-94.57%	3,216	5,682	3,
	20160729	MT103+	DKK	4	3	33.33%	2,576	10,093	-74.48%	693	17,293	4,
	20160729	MT103+	HKD	1	1	0.00%	419	419	0.00%	419	3,249	3,
	20160729	MT103+	THB	1	1	0.00%	230	3,893	-94.10%	230	8,000	8
	20160729	MT103+	SEK	1	3	-62.50%	183	2,334,398	-99.99%	183	1,580	1
	20160729	MT202	JPY	2	3	-23.08%	277,725,169	318,159,632	-12.71%	256,873,034	29,234,739,900	27,039,739
	20160729	MT202	USD	28	44	-35.74%	578,339,234	4,439,395,699	-86.97%		578,339,234	174,000
	20160729	MT202	EUR	43	37	17.12%	225,745,919	1,106,971,068	-79.61%		203,824,585	121,308,
	20160729	MT202	GBP	9	13	-31.52%	141,104,213	1,119,901,812	-87.40%		107,181,324	56,600
	20160729	MT202	CAD	4	4	-9.68%	59,325,326	346,007,949	-82.85%	34,204,926	78,048,399	45,000,
	20160729	MT202	SEK	3	2	23.53%	7,325,371	56,894,485	-87.12%	7,174,929	63,300,000	62,000,
	20160729	MT202	CHF	2	5	-61.11%	2,242,916	189,046,544	-98.81%	2,242,916	2,200,076	2,200
	20160729	MT202	DKK	3	2	75.00%	1,380,494	8,942,319	-84.56%	1,370,281	9,268,570	9,200
	20160729	MT202	NOK	1	1	-22.22%	467,525	23,892,225	-98.04%	467,525	4,000,000	4,000,
	20160729	MT202	AUD	1	1	-25.00%	262,588	18,337,258	-98.57%	262,588	350,000	350,
	20160729	MT202	NZD	2	2	0.00%	68,608	68,608	0.00%	40,316	97,000	57,
SWIFT-FCC-2	2018_update9	MT202C	USD	5	2	127.27%	294,596	921,700	-68.04%	238.838	294,596	238

# ALERTING MODULE: Payment Controls | A fraud detection & prevention tool

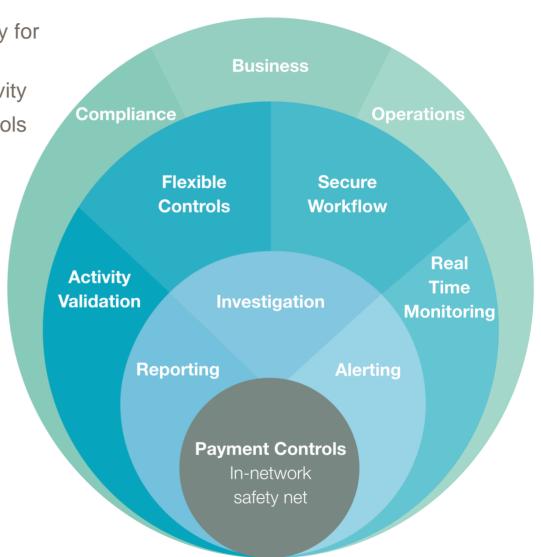
Make **SWIFT's Payment Controls** part of your strategy for protecting yourself against cyber-threats.

- A unique network view of your SWIFT payment activity
- Detect payment risks with **a**lerting & investigation tools
- Define your own Payment & Risk policy
- Build rules based on your traffic data

**Message scope** – Initially focused on FIN payment messages: **MT103**, **MT202**, **MT202cov**, MT205 & MT205cov

Enables your institution to:

- ✓ Control your payment processes
- ✓ Manage risk
- ✓ Ensure policies are met





# Payment Controls | Challenges the industry faces

**SWIFT's Payment Controls** 

Reduce Fraud Risks Reduce Reputational Risks

**Build Trust** 

- ✓ Real-time transaction monitoring Proactive fraud prevention tool enables subscribers to identify and stop payments
- ✓ In-network security no reliance on integrity of internal systems, a unique view of your SWIFT payment activity
- ✓ Sophisticated & flexible rules, based on your real data— Supporting a safe payment network for all correspondents
- ✓ Fast incident response build and implement rules quickly to respond to new incidents.

# Payment Controls 2 Modules

Module
1

# Reporting

Activity and Risk reporting Inbound and Outbound Group and/or Entity reporting

**Available Now** 

Module

# **Alerting**

Real-time alerting/blocking Outbound Subscriber-controlled rules

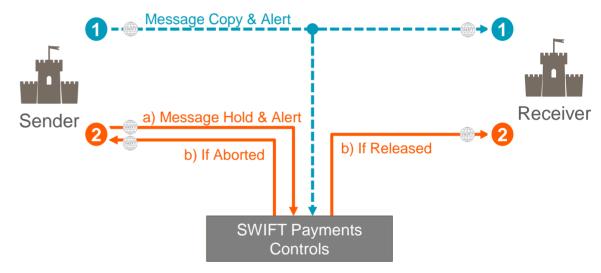
Available Q3 2018





## Real-time monitoring overview

- Real-time, in-network monitoring:
  - Payment Policy encode institution policies & monitor at a network level, e.g. to prevent payments above certain currency thresholds from being conducted without additional review, prevent out-of-hours payments
  - Risk Policy monitor and detect uncharacteristic messaging activity that may be indicative of fraud and review or flag such payments
- Provides a zero-footprint, secure in-network, payment safety-net against payment risks
- Flexible business workflow and rule management
- Operating modes: alert-only / alert-hold / autoaction
- Focused on sender controls

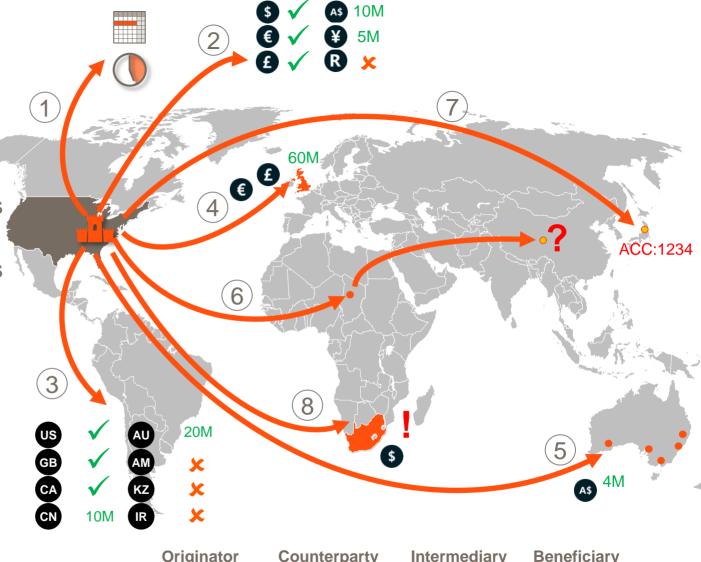


# Flexible parameters including:

- 1. Business hours and days
- 2. Currency whitelist / blacklists, single & aggregate payment limits
- 3. Country whitelist / blacklists, single & aggregate payment limits
- 4. Country & currency threshold combinations
- 5. BIC & Entity institution limits
- 6. New payment flows
- 7. Suspicious accounts
- 8. Uncharacteristic behaviours

Across the complete payment chain











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