EY’s unique approach to anti-money laundering

Responding to The Bahamas’ Anti-Money Laundering (AML), Countering the Financing of Terrorism (CFT) and Countering Proliferation Financing (CPF) regulatory requirements

Enhanced regulatory requirements in The Bahamas are requiring greater oversight, transparency and reporting.

The Anti-Money Laundering, Countering the Financing of Terrorism and Countering Proliferation Financing regulations expanded the scope of its requirements to all licensed entities.

Ernst & Young (“EY”) can help you adapt to the AML/CFT/CPF Laws and Regulations.
## The Bahamas AML/CFT/CPF considerations

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<th>Officer appointment</th>
<th>Risk-based approach</th>
<th>Politically exposed persons (PEPs)</th>
<th>Sanctions requirements</th>
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<td>A Money Laundering Reporting Officer (MLRO) and AML Compliance Officer must be appointed to oversee AML/CFT/CPF risk. The officers must be natural persons and approved by Financial Intelligence Unit (FIU), Central Bank of The Bahamas (CBOB) and the Securities Commission of The Bahamas (SCB)</td>
<td>Financial institutions need to develop their own methodology for risk-assessing clients</td>
<td>All PEPs are considered high-risk and enhanced due diligence (EDD) must be applied to all PEPs, including identification of the source of funds and source of wealth</td>
<td>SFIs must ensure they have appropriate controls to address sanctions requirements issued by the Government of The Bahamas</td>
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### Beneficial ownership

Beneficial owners (BOs) must be identified and disclosed at 10% and greater threshold level of any legal entities. All AML/CFT/CPF Supervised Financial Institutions (SFIs) are required to complete an independent AML assessment, in some cases annually depending on the financial services sector.

### Supervised Financial Institutions

Know your customer (KYC) from an eligible introducer must list the customer and the beneficial owners. The institution is responsible for monitoring and screening the customer and beneficial owners.

### Eligible introducers

Beneficial ownership
EY has successfully combined our deep financial crime experience, global regulatory credibility, large-scale service delivery centers and leading-edge technology solutions to offer an alternative operating model. We are future-forward in our thinking and the way in which we advise financial services firms on strategies to execute with lower cost and higher quality in a “business as usual” managed services model. We remain at the forefront of innovation across the industry and around the globe, helping firms evolve their financial crime operational model to the model of the future.

**How we can help: EY’s unique AML/CFT/CPF services offering**

- **Investigate and respond**
  - Transaction look-backs
  - Transformation program management
  - Internal investigation
  - Asset tracing

- **Manage regulatory change**
  - Independent oversight
  - Bank-side support to regulator intervention
  - Benchmarking and maturity assessments
  - Assurance reviews

- **Establish efficient risk management**
  - Transaction monitoring, name-screening system optimization
  - Process efficiency review, enhancement and robotics
  - Data analytics
  - Financial crime intelligence

- **Develop framework strategy and operating model**
  - Program reviews and control framework strategy
  - Technology systems strategy
  - Policy and procedure development
  - Risk assessment
  - Operating model development

- **Deliver financial crime operations**
  - KYC remediation
  - Alert clearing and backlogs
  - Quality control reviews
  - Financial crime managed services (outsourcing BAU)
  - Managed investigations team
  - Utility design
Benefits of working with EY

The Bahamas-based AML/CFT/CPF professionals with global reach and scale

- Local on-the-ground AML-skilled resources with Certified Anti-Money Laundering Specialist (CAMS) certification
- Strong knowledge and working relationships with local regulators
- Ability to scale workforce across geographies
- Global, consistent platform delivered through regional hubs
- Flexible model that delivers services onshore and offshore to balance cost, service levels and language needs

EY has the largest regional qualified team of Certified Anti-Money Laundering Specialists. Over 30 professionals from the EY region of The Bahamas, Bermuda, British Virgin Islands and Cayman Islands are part of our CAMS-certified team. This team is regionally recognized by both regulators and governments as a leader on these topics.

Meet our team

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EY | Building a better working world

EY exists to build a better working world, helping to create long-term value for clients, people and society and build trust in the capital markets.

Enabled by data and technology, diverse EY teams in over 150 countries provide trust through assurance and help clients grow, transform and operate.

Working across assurance, consulting, law, strategy, tax and transactions, EY teams ask better questions to find new answers for the complex issues facing our world today.