



The Institute of Banking and Finance of Trinidad and Tobago

ANTI-MONEY LAUNDERING AND FINANCIAL CRIME IN 2025: OPPORTUNITIES, RISKS AND CHALLENGES



One (1) Day Workshop Outline

OVERVIEW (Revised):

The global AML/CFT landscape is undergoing a significant shift as financial institutions respond to evolving regulatory expectations, technological innovation, and increasingly complex financial crime risks. Going into 2025, the focus is no longer solely on technical compliance but on effectiveness, proportionality, and risk-based implementation.

This workshop explores how FATF-driven priorities—such as enhanced beneficial ownership transparency, cross-border collaboration, and financial inclusion—are reshaping compliance programs. It also examines the growing role of advanced technologies like AI, machine learning, and behavioural analytics in transaction monitoring and customer risk segmentation.

Caribbean jurisdictions, in particular, are strengthening legal frameworks and supervisory capabilities in preparation for the FATF's 5th Round, with a renewed emphasis on national risk assessments, virtual asset oversight, and de-risking challenges.

Through regional case studies and practical strategies, this course will guide participants in implementing modern AML/CFT measures that balance compliance, operational efficiency, and financial integrity in a dynamic global environment.



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Key Themes in AML

FATF Driven

1. Risk-Based Approach (RBA) Expansion

- Heightened focus on proportionality and effectiveness, not just technical compliance.
- Greater scrutiny on sectoral risk assessments and customer risk segmentation.

2. AML-CFT and Financial Inclusion

- Balancing derisking pressures with inclusion goals, especially for vulnerable populations and small financial institutions.
- Use of simplified due diligence (SDD) under certain risk conditions.

3. Focus on Beneficial Ownership Transparency

- Push for public and centralized registries.
- Enhanced due diligence for legal persons, trusts, and shell entities.

4. Cross-Border and Public-Private Collaboration

- Emphasis on intelligence sharing, especially in correspondent banking and trade finance.
- Growing use of Public-Private Partnerships (PPPs) and FIUs engaging FinTechs and RegTechs.

Tech-Driven Compliance

1. Growing adoption of AI, machine learning, and advanced analytics in:

- Transaction monitoring
- Name screening
- Behavioural analytics

2. Emphasis on explainable AI (XAI) to meet regulatory expectations.

3. Transaction Monitoring & STR/CTR Improvements

- Tools enabling near-real-time alerts.
- Authorities pushing for faster, more granular suspicious activity reporting.

AML and Intersecting Financial Crime

ESG and AML

- Environmental crimes (e.g., illegal mining, logging, trafficking) now recognized as AML predicate offenses.
- Greater linkage between sustainability risks and financial crime risks.



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AML and Fraud and Cybersecurity

- Increasing convergence of AML, fraud risk management
- Shared data platforms and cross-functional investigative teams.

AML and Cybersecurity

AML and Virtual Assets

- Stronger oversight of VASPs, DAOs, mixers, and DeFi platforms.
- Continued implementation of the FATF Travel Rule

Regional & Caribbean-Specific Developments

FATF 5th Round Preparedness

- Caribbean jurisdictions strengthening national risk assessments, supervision, and sanctions frameworks.
- Focus on effectiveness measures—not just laws on paper.

De-risking and Correspondent Banking

- Enhanced KYCC (Know Your Customer's Customer) expectations.
- Regional banks under pressure to demonstrate robust AML programs to retain correspondent relationships.

AML Legislation Updates

- Several jurisdictions (e.g., Barbados, T&T) revising laws to address:
 - Politically Exposed Persons (PEPs)
 - Virtual asset oversight
 - Enhanced penalties and compliance obligations

Capacity Building & Tech Modernization

- Investments in compliance technology, especially among smaller banks.
- Regional training on AI in AML, risk-based supervision, and ML/TF typologies.

Emerging Threats

- Increased scrutiny of real estate, non-profit organizations, and cash-intensive businesses.
- Human trafficking and online fraud cases showing cross-border linkages.

Trinidad Banking Sector: Financial Crime Risk-Aligned Case Studies

Let's talk Solutions: Mitigation (prevention, detection, and response) of FC and AML risk in a FI/Bank



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Preventive Solutions

- A. Strong Customer Due Diligence (CDD) / Know Your Customer (KYC)
 - Tiered risk-based KYC procedures (simplified vs. enhanced)
 - Automated onboarding systems with identity verification (biometrics, eKYC)
 - Ultimate Beneficial Ownership (UBO) validation tools
- B. Sanctions & PEP Screening
 - Real-time screening systems integrated with global watchlists (OFAC, UN, EU, etc.)
 - Ongoing monitoring of clients for changes in PEP or sanctions status
- C. Risk-Based Customer Segmentation
 - Dynamic segmentation of customers by ML/TF risk levels
 - Assignment of enhanced due diligence (EDD) for high-risk categories (e.g. PEPs, offshore entities)
- D. Employee Training & Ethics Culture
 - Regular AML training tailored by role (frontline, compliance, risk)
 - Internal whistleblower mechanisms and ethical reporting hotlines

Detection Solutions

- A. Transaction Monitoring Systems (TMS)
 - Automated rule-based and behavior-based monitoring
 - Use of machine learning to reduce false positives and detect complex patterns
- B. Integration with Fraud & Cyber Units
 - Sharing intelligence on suspicious activity between AML, fraud, and cyber teams
 - Common case management platforms
- C. Data Analytics and AI Tools
 - AI/ML to identify anomalies in customer behavior, velocity of transactions, and layering patterns
 - Natural Language Processing (NLP) for scanning unstructured data (e.g. email, documents)
- D. Trade-Based Money Laundering (TBML) Controls
 - Automated matching of invoices to shipping and payment data
 - Red flag detection for over/under-invoicing and false shipments



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Response & Oversight Solutions

A. Suspicious Transaction Reporting (STR) Framework

- Streamlined internal escalation and STR submission process
- Confidentiality safeguards and staff protection

B. AML Governance Structure

- Clear roles and responsibilities for first and second line functions
- Strong Board and senior management oversight of AML risks

C. Independent AML Audits and Testing

- Periodic reviews of AML controls, STRs, KYC files, and system parameters
- External testing for system effectiveness and regulatory conformance

D. Regulatory Reporting Automation

- Automated generation of CTRs, STRs, and risk-based supervisory reports
- Centralized compliance dashboards and MI for regulators and Board

Building a Supportive Base: Tools & Infrastructure

- AML Case Management Platforms (e.g. NICE Actimize, SAS, FICO, Oracle FCCM)
- Screening tools (e.g. World-Check, Dow Jones Risk & Compliance, ComplyAdvantage)
- eKYC vendors (e.g. Jumio, Onfido, Trulioo)
- Risk Scoring Engines
- Internal Watchlists & Blacklists
- Cyber threat intelligence feeds integrated with AML



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WHO SHOULD ATTEND:

Customer service agents and compliance officers employed within banks and other financial institutions including: Chief Compliance Officer, Chief Risk Officers, Chief Anti-Money Laundering Officers, Money Laundering Research Officers, Auditors, Attorneys, Accountants, Broker Dealers, Commercial Banks, Credit Institutions, Credit Unions, Development Banks, Import & Export Businesses, Insurance Companies, Money Value Transfer Services, Mortgage Companies and Trust & Company Service Providers

METHODOLOGY:

This workshop will incorporate an interactive mix of a PowerPoint presentation, group discussions, question and answer sessions and case study analysis.

WHY YOU SHOULD ATTEND

- **Bank and Financial Institutions (FIs) Focused**
 - Focuses exclusively on financial crimes issues facing banks and FIs
- **Benchmark Your Program**
 - Benchmark your bank's AML/CFT/OFAC performance against leading practices.
- **Up-to-the-Minute Information**
 - Hear current and future risks and get trending red flags to improve system monitoring



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FACILITATOR'S BIO

CANDICE R. HUGGINS
(LLB) (LEC) (GARP)

Candice Huggins, chief compliance officer at a leading regional banking outfit.

Huggins's extensive experience spans over 20 years of work in the legal, risk management and regulatory compliance within the financial services sector with specialization in international financial services, compliance and risk management. She has worked in both the private and public sectors in multiple jurisdictions (Cayman Islands, British Virgin Islands, Barbados, Trinidad and Tobago and Canada).

Huggins has advised extensively on regional AML, fraud and risk issues through her work with international bodies such as the International Monetary Fund (IMF), World Bank (WB) and the Organization of American States. Specifically, she has served as a consultant for regional and international projects such as the CFATF (Caribbean Financial Action Task Force) Mutual Evaluation and Country Assessment and Preparation programs and the International Monetary Fund/World Bank Offshore Caribbean Pilot Project on AML compliance.

She has litigated in the area of white-collar crime contributing to the jurisprudence of the region as well as developed and implemented risk and compliance programs for credit unions, banks, trust & company service providers, securities companies and real estate agents.