



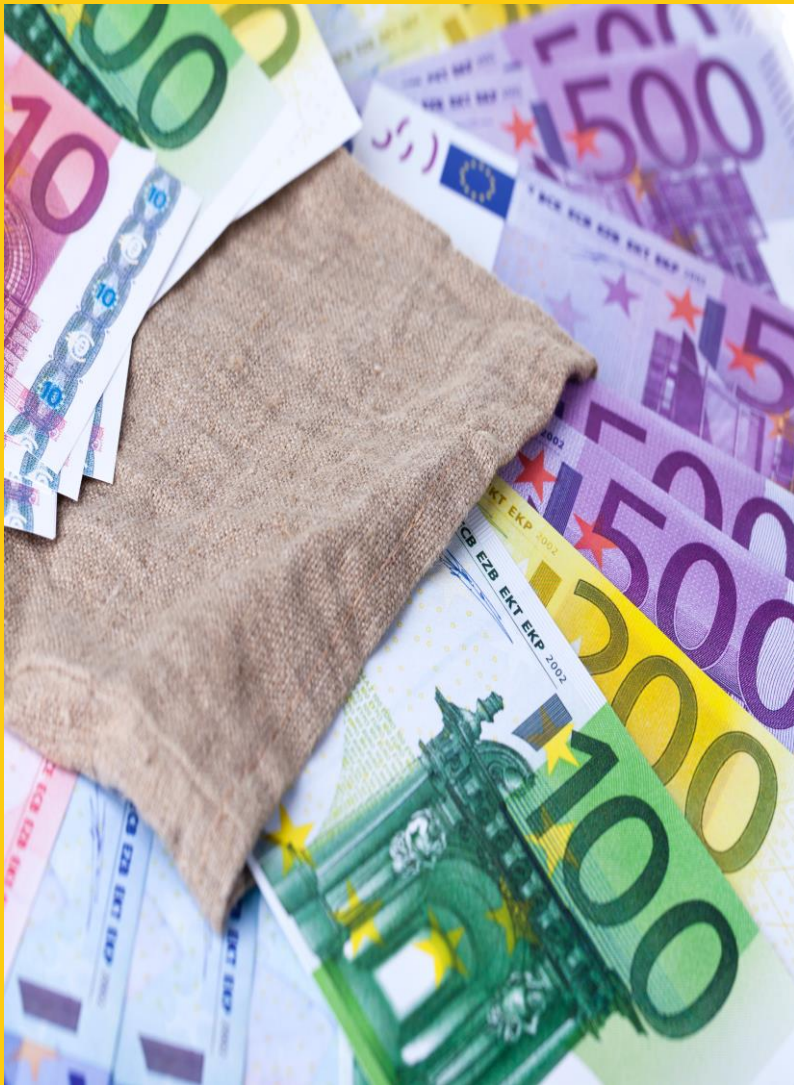
Financial
Intelligence
Analysis Unit



Money Laundering and Terrorist Financing risks associated with Trusts and Foundations

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**RISK BASED
APPROACH:

UNDERSTANDING

ASSESSING

MITIGATING THE
RISKS**



Level of Inherent Risk
—
Mitigating Measures
=
Level of Residual Risk





RESIDUAL RISKS



BUSINESS RISK APPETITE





Possible obstacles when dealing with trusts of foundations:

- Transparency
- Complexity
- High risk as per National Risk Assessment



FIAU IMPLEMENTING PROCEDURES PART I



BENEFICIAL OWNERSHIP

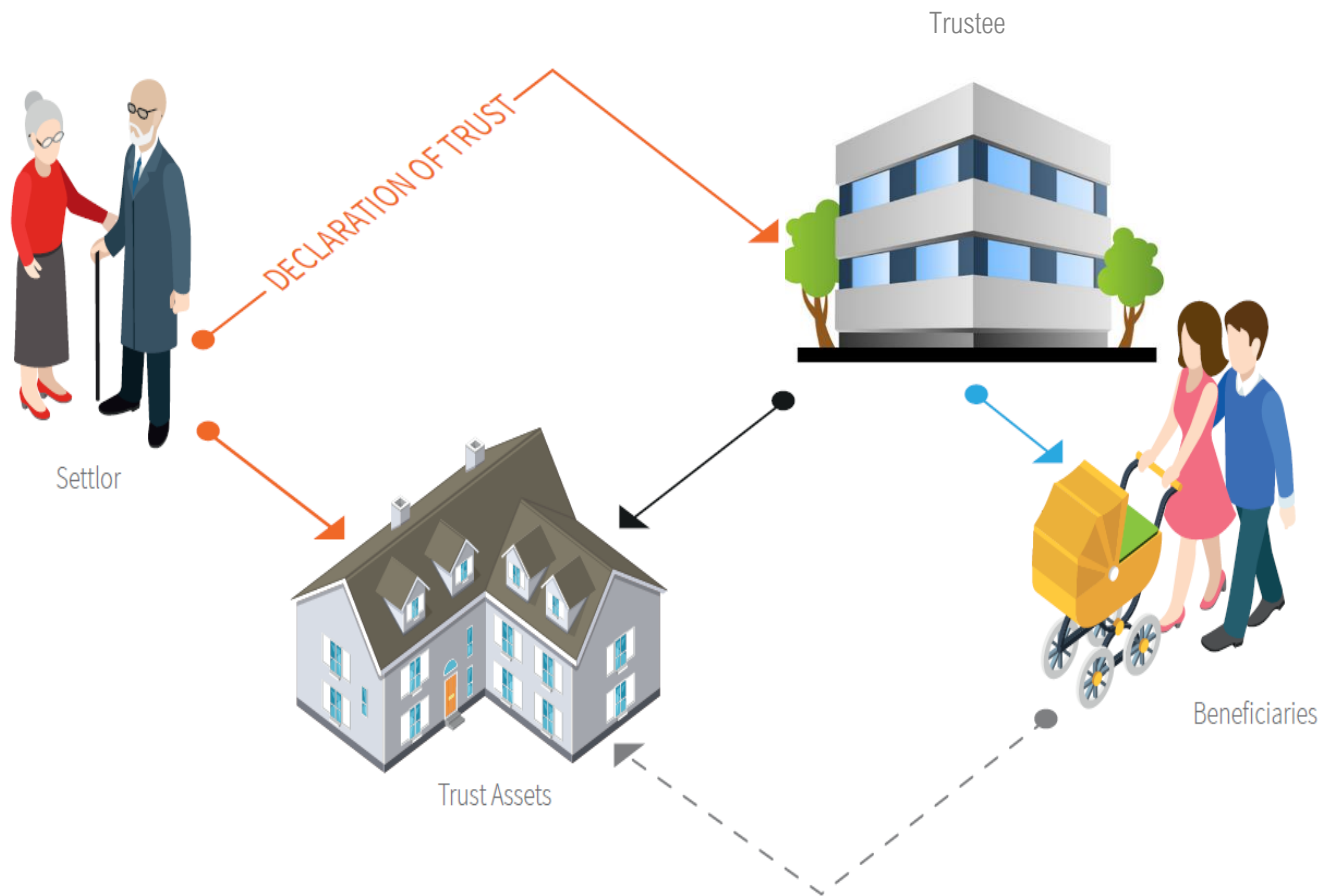
Trusts - 4.2.2.2

Legal entities, such as foundations, and legal arrangements similar to trusts - 4.2.2.3

IDENTIFICATION AND VERIFICATION

When the Customer is a Foundation or an Association - 4.3.2.4

When the Customer is a Trust/Trustee - 4.3.2.5





EXAMPLES OF RISK FACTORS: HOW CAN WE MITIGATE THEM?

CUSTOMER RISKS:

- PEPs
- HNWIs
- Complex structures

GEOGRAPHIC RISKS:

- High risk jurisdictions
- Non-reputable jurisdictions

DELIVERY CHANNEL RISKS:

- Non face-to-face
- Services provided through intermediaries



Thank you!