



FINANCIAL CRIME COMPLIANCE SOLUTIONS

EXPERTS WITH IMPACT™

FTI Consulting's dedicated Financial Crime Compliance ("FCC") practice is a core component of FTI Consulting's full-service Risk Advisory & Investigations offering. The practice is led, managed and staffed predominantly by FCC practitioners. By employing senior professionals, who have designed, implemented and managed complex FCC programmes at tier-one banks and other organisations, often under direct regulatory scrutiny, FTI Consulting is uniquely placed to offer our clients, as a trusted advisor with deep subject matter expertise, practical, tailored FCC solutions. With offices across Asia Pacific, EMEA and the Americas, FTI Consulting assists clients in addressing FCC-related issues or delivering change programmes at the local, regional or global level.



Rod Francis

Senior Managing Director
Financial Crime Compliance Leader

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Rod Francis is a Senior Managing Director and leads the Financial Crime Compliance practice in Asia at FTI Consulting. He is based in Hong Kong.

Rod is a senior compliance professional who has over 30 years' experience in the financial services industry. The majority of his career has been spent in risk management related roles covering a range of business sectors and products including consumer/retail, wholesale, corporate and investment, wealth management and asset management banking. For the last 12 years, he has been based in Hong Kong covering the Asia Pacific (APAC) region and prior to this, he was based in London covering Europe, Middle East and Africa (EMEA).

Prior to joining FTI Consulting, Rod was Citibank's APAC Regional Head of Anti-Money Laundering (AML) Compliance for eight years. This role encompassed responsibility for AML compliance for the global consumer bank for EMEA. In this role, Rod was the senior executive leader responsible for, and instrumental in, leading Citibank's successful AML change program in response to U.S. regulatory commitments. During this period, he also had responsibility for economic sanctions (Sanctions) compliance and anti-bribery & corruption (AB&C). In APAC, Rod also worked for

UBS where he held a number of senior management positions including APAC Head of Central Compliance where he was responsible for establishing and implementing the unit in the region as well as a global unit for regulatory reporting. He was also the APAC Head of AML and Sanctions Compliance.

Prior to 2007, Rod was based in London covering EMEA working for tier one banks. Amongst compliance roles for financial institutions, he was the EMEA Regional Head of AML and Sanctions for both Credit Suisse and Morgan Stanley, incorporating central compliance and operations compliance for each respectively.

He implemented Morgan Stanley's first EMEA regional AML Compliance function and assisted Credit Suisse in EMEA redesigning its regional AML program with focus on both efficiency and effectiveness. Rod has a broad in-depth knowledge and experience in all aspects of AML, sanctions and anti-bribery compliance, is a member of the Association of Certified Anti-Money Laundering Specialists (ACAMS) and the Director of Membership and Board Member of the Hong Kong Chapter of ACAMS. He regularly speaks at industry events including ACAMS seminars.

Our service offerings

-  Programme design, development and implementation
-  Programme effectiveness and sustainability reviews
-  Programme enhancement, optimisation and remediation
-  Board-level, key person and staff training
-  Conducting regulator-mandated independent reviews and monitorships
-  Assisting clients effectively to manage regulator relationships and strategies, and interpreting regulators' expectations
-  Working with legal advisors in the context of regulatory enforcement or investigations
-  Implementation, optimisation and validation of post-transaction monitoring and transaction screening systems
-  Performing enterprise-wide risk assessment

Related services

Cybersecurity

Assisting clients of any size address their most critical needs and integrate new solutions on top or alongside pre-existing policies and programs to address cyber threats.

Data Analytics

Delivering strategic business solutions to clients requiring in-depth analysis of large, disparate sets of financial, operational and transactional data.

Internal Investigations

Providing a multidisciplinary approach to complex factual, financial and business-critical investigations, combining functional expertise in corporate internal investigations.

Computer Forensics

Helping organisations root out fraud, maintain regulatory compliance, reduce legal and IT costs, protect sensitive materials, quickly find facts and harness organisational data to create business value.

Investigative Due Diligence

Undertaking sophisticated investigations, uncovering actionable intelligence and performing value-added analysis to help decision-makers address and mitigate risk, protect assets, make informed decisions and maximise opportunities.



Anti-money laundering

“ While it is fair to say most banks are getting the balance right, there should be no doubt on the part of the industry or the public that where they do not, we will take action. ”

*Stewart McGlynn,
Division Head, AML, Hong Kong Monetary Authority*

With 40+ regulators, APAC is one of the most complex jurisdictions in terms of its regulatory compliance landscape. Since the beginning of 2018, regulators have issued over \$600 million in fines, last year being the highest one on record with over \$500 million in monetary penalties. Unlike its North American counterparts, the majority of enforcement action stems from AML-related failings. The industry should expect to see a continuing trend of increasing enforcement action in Asia.

🔍 CASE STUDY

FTI Consulting was engaged as an independent consultant to an international bank. Our work included evaluation of the adequacy and effectiveness of the AML compliance programme and internal controls; the organizational structure, management oversight and reporting lines; review and testing of past transactions and investigation of possible violations of laws or regulations. The work involved a review of the evolution of the programme over a five year period, as well as an assessment of the likelihood of future compliance based on the compliance programme's strength and flexibility, the institution's projected growth, and the changing regulatory environment.

Economic sanctions

“ I probably spend about 50 percent of my time... on sanctions... We're dealing with, as you know, some of the most complicated issues right now ”

*Steve Mnuchin,
United States Secretary of the Treasury*

In recent years, sanctions have, once again, become an increasingly utilised tool. Sanctions laws, and related guidance, are complex and in constant flux. Ensuring compliance is therefore challenging. There is an ever changing landscape of sanctions risks associated with Iran, North Korea, Russia and Venezuela; the Office of Foreign Assets Control (OFAC), has strengthened its approach on compliance expectations; the updated European Union (EU) Blocking Statute has introduced new compliance hurdles; there's a potential divergence between United States (US) and EU sanctions policies; and questions are being raised around the United Kingdom's (UK) treatment of EU sanctions post-Brexit.

🔍 CASE STUDY

In the context of a potential breach of OFAC-related sanctions, FTI Consulting was engaged by an international bank to map out its end-to-end sanctions screening programme, at the centralised and local level across multiple jurisdictions, in order to identify any weaknesses, from a system, process or controls perspective. Further, FTI Consulting's work involved an assessment of the specific requirements in place, and their effective operation, at specific times in the customer's lifecycle.

Anti-bribery & corruption

“ The overall trend is that corruption remains a global threat and maybe it has become even more on the top of the international agenda, it is the number one issue. ”

*Patrick Moulette,
Head of the Anti-Corruption Division, Organisation for
Economic Co-operation and Development*

As with other areas of financial crime, 2019 will likely see greater financial penalties and longer custodial sentences as they might relate to AB&C violations. It remains of paramount importance that AB&C programmes are up-to-date in order to address risks associated with their evolving business.



FTI Consulting was engaged by a client with an extensive Asia footprint to undertake an AB&C risk assessment across its entire operations. FTI Consulting's work included a review, enhancement and implementation of AB&C internal policies and procedures (in the context of prevailing legal and regulatory requirements) to address programme weakness that had been identified.

Why FTI Consulting for Financial Crime Compliance Solutions?

FTI Consulting offers comprehensive and customised services to meet each and every challenge facing financial institutions. Our professionals have the expertise needed to accurately assess problems, understand clients' and regulators' requirements, and design the appropriate solutions. We blend our expertise and investigative experience with our specialised technology and data services to develop cost-effective solutions for our clients.



CREDIBILITY AND INDEPENDENCE

We are recognised for our credibility with regulators and our independence. We do not provide audit attestation services.



INDUSTRY, REGULATORY AND CONSULTING EXPERIENCE

Our teams are composed of professionals with senior executive industry, regulatory and consulting experience which enables us to provide practical regulatory insights and support.



INNOVATIVE & ADVANCED SOLUTIONS

We bring FTI Consulting's experiences from a wide range of industries which face similar challenges, to deliver innovative, pragmatic, and effective solutions for our clients. We offer advanced technology solutions to enable our clients to better manage their governance, risk and regulatory challenges. We have access to a range of economists, statisticians and analysts to support our work.



LOCAL LANGUAGE CAPABILITIES

We have extensive experience working on complex issues and multi-faceted assignments, to which we bring a wide range of experience, skills and practical knowledge. We provide staff with local language capabilities when needed and work across segments in a collaborative and efficient manner.



QUALITY AND INTEGRITY

Our heritage of litigation and regulatory assignments underpins a consistent commitment to quality and integrity. Our experience in investigating failures and errors means we know how to ensure they are avoided in future.

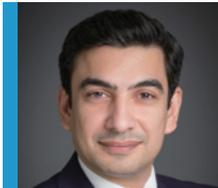


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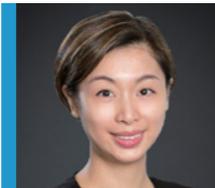
FTI Consulting's senior leaders average more than 20 years of experience, combining a deep industry background in regulation, compliance, and investigations, with a long history of successfully undertaking our most sensitive consulting assignments. Our senior staff members lead from the front and actively participate throughout engagements.

Select team profiles



Naresh Sakhrani
 Managing Director
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Naresh is a senior financial crime compliance professional with 20 years' combined experience in establishing and managing AML and fraud investigations programmes and practices, leading pre-transaction due diligence and legal forensic assignments, and as a solicitor focusing on corporate and regulatory law. Previously, he was the Global Financial Intelligence Unit (FIU) Governance & Oversight Head at Citibank, where he was responsible, globally, for ensuring the proper and effective operation of AML investigations processes across the corporate, consumer and private banks.



Kitty Chan
 Senior Director
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Kitty has 15 years of combined experience in AML, Sanctions, AB&C and fraud investigations. She is experienced in leading financial crime risk and customer due diligence (CDD) management for corporate & investment banking and markets client segments in Asia Pacific, from both an AML and Sanctions perspective. Prior to FTI Consulting, Kitty was the North Asia AML Cluster Head at Bank of America. She also led the CDD risk management team covering various business lines in Asia Pacific. Prior to that, she was a part of the Asia Pacific Sanctions team at Citibank which managed Sanctions compliance initiatives and related escalations from all business sectors.



Aditya Chopra
 Senior Director
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Adi has 15 years' solid experience in setting up and managing AML, Sanctions and fraud investigations programmes and practices, leading Federal Financial Institutions Examination Council reviews and forensic assignments. Prior to joining FTI Consulting, Adi was the APAC FIU Governance & Oversight Head at Citibank, where he was responsible for ensuring the proper and effective operation of AML investigations processes across the corporate, consumer and private banks. Between 2011 and 2018, he held several other senior roles covering Private Banking FCC Advisory and was the Country Money Laundering Reporting Officer overseeing AML and Sanctions. Prior to Citibank, Adi was a member of the Financial Services Advisory segment, specialising in FCC at a "Big Four" accounting firm.



Matt Naletilic
 Director
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Matt has five years' experience in design, enhancement, review and implementation of post- transaction monitoring detection and know your customer and client due diligence programmes for major, tier-one financial institutions in North America and Asia Pacific. Previously, he was responsible for leading Citibank's efforts in developing and implementing an AML post-transaction monitoring framework for the Consumer Bank's Credit Card portfolio of 17 million accounts in 12 Asia Pacific countries.

FTI Consulting advises global clients on all continents

With offices in every major financial center and every corner of the globe, we successfully serve our clients wherever challenges and opportunities arise.



\$4.4BLN Market Capitalization

FCN NYSE

5,400+ Consultants & Professionals

550+ Senior Managing Directors

Advisors **95** of the world's top **100** law firms



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About FTI Consulting

FTI Consulting is an independent global business advisory firm dedicated to helping organisations manage change, mitigate risk and resolve disputes: financial, legal, operational, political & regulatory, reputational and transactional. FTI Consulting professionals, located in all major business centres throughout the world, work closely with clients to anticipate, illuminate and overcome complex business challenges and opportunities.

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