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**ONGOING MONITORING** 

Even when alert activity has cleared the assessment





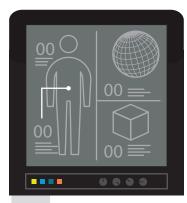
Knowing your customer—really understanding them, their products, services, market areas and business-specific context can help your organization avoid high-risk situations and potential catastrophe. A system of monitoring, both automated and human, are mission-critical.

What Does an Effective Customer Risk Assessment Program Look Like?



WHO IS THE CUSTOMER?
WHERE DO THEY DO BUSINESS?
WHAT IS THE PRODUCT/SERVICE?
HOW DO THEY DO BUSINESS?

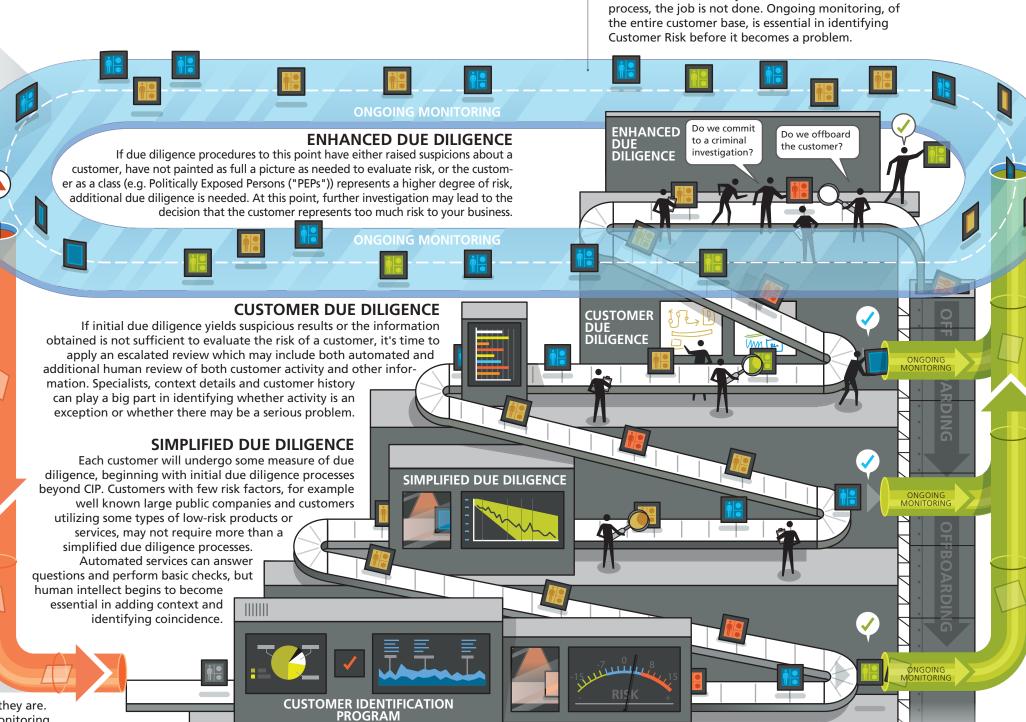
**WITH WHOM** DO THEY DO BUSINESS?



## CUSTOMER IDENTIFICATION PROGRAM (CIP)

Each step in the Customer Risk Assessment Program is connected. The first step taken, the CIP, ensures that

the customer is who they say they are. This ensures a base level of monitoring.



## What Should My Team Look Like?

Involving the right players is the most critical component for success in any Anti-Money Laundering Program. Key players on the Customer Risk Assessment Team can be:

- Relationship Managers
- Brokers
- Customer Referrers
- Tellers, Bankers, related personnel
- All customer touch points and contributors

## It's All About Context

Understanding the way in which your customers do business can avoid an unnecessary, costly investigation. Depositing \$10,000 every day in the Summer may be completely normal for seasonal businesses, but a red flag for suspicious activity for others.

Understanding these customer business variations and tuning your Customer Risk Assessment Program appropriately can help your organization identify customer risk faster and more accurately.

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