
Compliance and Anti Money Laundering

Compliance Monitoring Unit

Compliance Monitoring Unit (CMU) – Term: Compliance Monitoring Unit. Related terms: risk assessment, regulatory reporting, audit trail. Definition: The CMU is a dedicated function within a financial institution responsible for continuously overseeing, testing, and verifying that all business activities comply with applicable laws, regulations, and internal policies, especially those aimed at preventing money laundering and terrorist financing. Example: A bank's CMU reviews daily transaction logs to identify patterns that may indicate structuring. Practical application: The CMU designs monitoring scenarios, runs automated checks, and escalates suspicious findings to the AML (Anti-Money-Laundering) team. Challenges: Balancing thoroughness with operational efficiency, integrating disparate data sources, and keeping pace with evolving regulatory expectations.

Anti-Money Laundering (AML) – Term: Anti-Money Laundering. Related terms: CMU, sanctions screening, customer due diligence. Definition: A set of laws, regulations, and procedures designed to detect, prevent, and report the movement of illicit funds. Example: A compliance officer files a SAR (Suspicious Activity Report) after the CMU flags a series of large cash deposits from a high-risk jurisdiction. Practical application: AML programs include transaction monitoring, KYC (Know Your Customer) processes, and staff training. Challenges: Maintaining consistent data quality, adapting to new typologies, and managing the cost of technology investments.

Beneficial Owner – Term: Beneficial Owner. Related terms: ultimate beneficial owner (UBO), ownership structure, CMU. Definition: The natural person who ultimately owns or controls a customer, directly or indirectly, and who benefits from the assets or activities of the entity. Example: In a corporate client onboarding, the CMU identifies the UBO as a private individual holding 55% of shares through a series of shell companies. Practical application: Identifying beneficial owners enables risk-based assessment and targeted monitoring. Challenges: Complex corporate structures, lack of public registries, and privacy laws that limit disclosure.

Compliance Risk – Term: Compliance Risk. Related terms: risk appetite, CMU, regulatory breach. Definition: The risk of legal or regulatory sanctions, financial loss, or reputational damage arising from failure to comply with laws, regulations, or internal policies. Example: A failure to screen customers against sanctions lists leads to a fine, illustrating compliance risk materialising. Practical application: The CMU quantifies compliance risk using scoring models and prioritises monitoring resources accordingly. Challenges: Quantifying intangible risks, aligning risk appetite with business objectives, and ensuring consistent risk culture across lines of business.

Customer Due Diligence (CDD) – Term: Customer Due Diligence. Related terms: KYC, Enhanced Due Diligence (EDD), risk rating. Definition: The process of collecting and verifying information about a client's identity, business activities, and risk profile at the time of onboarding and on an ongoing basis. Example: The CMU conducts CDD on a new corporate client by verifying incorporation documents, identifying UBOs,

and assessing the client's sector risk. Practical application: CDD informs the monitoring parameters set for the client's transactions. Challenges: Incomplete documentation, rapid client onboarding demands, and evolving regulatory expectations for verification standards.

Data Quality – Term: Data Quality. **Related terms:** data integrity, CMU, data governance. **Definition:** The accuracy, completeness, timeliness, and consistency of data used for compliance monitoring and reporting. **Example:** Poor data quality in customer address fields leads to false positives in geographic risk scoring. **Practical application:** The CMU implements data cleansing routines and validates source systems before running monitoring scenarios. **Challenges:** Legacy systems, fragmented data silos, and resource constraints for ongoing data stewardship.

Enhanced Due Diligence (EDD) – Term: Enhanced Due Diligence. **Related terms:** high-risk client, CMU, politically exposed person (PEP). **Definition:** A more rigorous level of scrutiny applied to customers or transactions that present a higher risk of money laundering or terrorist financing. **Example:** For a client flagged as a PEP, the CMU requires source-of-wealth documentation and conducts deeper transaction pattern analysis. **Practical application:** EDD triggers additional monitoring rules, higher transaction thresholds, and more frequent reviews. **Challenges:** Obtaining reliable documentation, balancing client experience with compliance obligations, and managing the increased workload.

Financial Action Task Force (FATF) – Term: Financial Action Task Force. **Related terms:** FATF Recommendations, CMU, global AML standards. **Definition:** An intergovernmental body that sets international standards to combat money laundering, terrorist financing, and other threats to the integrity of the financial system. **Example:** The CMU updates its monitoring rules to reflect new FATF guidance on virtual assets. **Practical application:** Institutions adopt FATF Recommendations as a benchmark for their AML programs. **Challenges:** Translating high-level standards into operational controls, and monitoring compliance across multiple jurisdictions.

Geographic Risk – Term: Geographic Risk. **Related terms:** high-risk jurisdiction, CMU, risk scoring. **Definition:** The level of AML risk associated with a client's location, based on factors such as corruption levels, prevalence of illicit finance, and regulatory robustness. **Example:** A client operating in a country flagged by the FATF as "high-risk" receives a higher risk rating, prompting the CMU to apply stricter monitoring thresholds. **Practical application:** Geographic risk informs the segmentation of monitoring scenarios and the frequency of reviews. **Challenges:** Keeping the risk matrix updated, dealing with clients operating in multiple jurisdictions, and avoiding over-reliance on static country lists.

KYC (Know Your Customer) – Term: Know Your Customer. **Related terms:** CDD, CMU, client onboarding. **Definition:** The process of verifying the identity of customers and understanding the nature of their activities to assess risk. **Example:** During onboarding, the CMU checks the client's passport, proof of address, and corporate registration documents. **Practical application:** KYC data populates the client risk profile and determines monitoring parameters. **Challenges:** Verifying documents in jurisdictions with limited public data, managing ongoing KYC refreshes, and integrating KYC data across multiple platforms.

Legal Entity Identifier (LEI) – Term: Legal Entity Identifier. **Related terms:** global identifier, CMU, counterparty risk. **Definition:** A 20-character alphanumeric code that uniquely identifies legal entities participating in

financial transactions worldwide. Example: The CMU uses LEIs to match counterparties across different transaction systems, reducing duplication. Practical application: LEIs facilitate regulatory reporting and enhance data quality in monitoring. Challenges: Ensuring all clients have a valid LEI, dealing with entities that lack an LEI, and maintaining up-to-date registration data.

Monitoring Scenario – Term: Monitoring Scenario. Related terms: rule-based detection, CMU, threshold. **Definition:** A predefined set of conditions and parameters that trigger alerts when transactions match suspicious patterns. Example: A scenario that flags cash deposits exceeding \$10,000 within a 24-hour period for high-risk clients. Practical application: The CMU configures scenarios in the transaction monitoring system to target specific risk indicators. Challenges: Tuning scenarios to minimise false positives, adapting to new typologies, and ensuring coverage across all product lines.

PEP (Politically Exposed Person) – Term: Politically Exposed Person. Related terms: EDD, CMU, risk rating. **Definition:** An individual who holds or has held a prominent public function, as well as their immediate family members and close associates, who may present a higher AML risk. Example: The CMU flags a client who is a former minister's spouse, initiating EDD procedures. Practical application: PEP status influences the client's risk score and determines additional monitoring rules. Challenges: Verifying PEP status across multiple jurisdictions, handling changes in political status, and avoiding over-screening.

Risk Appetite – Term: Risk Appetite. Related terms: risk tolerance, CMU, board oversight. **Definition:** The amount and type of risk an organization is willing to pursue or retain in pursuit of its objectives, expressed in qualitative or quantitative terms. Example: A bank sets a low risk appetite for AML violations, prompting the CMU to allocate more resources to high-risk monitoring. Practical application: Risk appetite guides the design of monitoring thresholds and resource allocation. Challenges: Aligning risk appetite with business growth, communicating risk limits across lines, and measuring adherence over time.

Sanctions Screening – Term: Sanctions Screening. Related terms: watch-list, CMU, transaction blocking. **Definition:** The process of comparing client names, identifiers, and transaction details against government-issued sanctions lists to prevent prohibited dealings. Example: The CMU runs automated screening and blocks a transfer to an entity listed on the OFAC SDN list. Practical application: Screening is performed at onboarding, during transaction processing, and on an ongoing basis. Challenges: Managing false positives due to name similarities, handling multiple jurisdictions' lists, and ensuring timely updates.

Suspicious Activity Report (SAR) – Term: Suspicious Activity Report. Related terms: CMU, regulatory filing, FINCEN. **Definition:** A confidential report filed by a financial institution to a relevant authority when a transaction or pattern of activity appears suspicious and may be linked to money laundering or other illicit conduct. Example: After the CMU identifies a series of layered transfers, the compliance officer files a SAR with the national financial intelligence unit. Practical application: SARs provide law-enforcement agencies with actionable intelligence. Challenges: Determining when a transaction is sufficiently suspicious, protecting confidentiality, and managing reporting timelines.

Transaction Monitoring – Term: Transaction Monitoring. Related terms: monitoring scenario, CMU, real-time alerts. **Definition:** The systematic review of customers' transaction activity, using automated tools and manual analysis, to detect potentially suspicious behavior. Example: The CMU's system generates an alert

for a client who rapidly moves funds between high-risk jurisdictions. Practical application: Monitoring supports ongoing risk assessment and triggers investigations. Challenges: High volume of alerts, calibration of thresholds, and integration with legacy transaction processing systems.

Ultimate Beneficial Owner (UBO) – Term: Ultimate Beneficial Owner. Related terms: beneficial owner, CMU, ownership chain. Definition: The natural person who ultimately owns or controls a legal entity, directly or indirectly, and who benefits from its assets. Example: In a multi-layer corporate structure, the CMU traces ownership through three shell companies to identify the UBO holding 40% of the ultimate equity. Practical application: UBO identification is essential for risk scoring and compliance reporting. Challenges: Incomplete public registers, privacy regulations, and complex offshore structures.

Virtual Asset Service Provider (VASP) – Term: Virtual Asset Service Provider. Related terms: cryptocurrency, CMU, AML obligations. Definition: An entity that conducts activities such as exchange, transfer, or custody of virtual assets, and is subject to AML/CTF regulations. Example: The CMU extends its monitoring to a VASP client, applying rules for rapid token transfers. Practical application: VASPs must implement KYC, transaction monitoring, and SAR filing similar to traditional banks. Challenges: High transaction velocity, pseudonymous addresses, and rapidly evolving regulatory guidance.

Watch-List – Term: Watch-List. Related terms: sanctions screening, CMU, risk flag. Definition: A compiled list of individuals, entities, or vessels that are subject to regulatory restrictions, heightened scrutiny, or monitoring due to suspected illicit activity. Example: The CMU updates its watch-list daily to include newly sanctioned individuals from the UN Security Council. Practical application: Watch-lists are used in onboarding and ongoing transaction screening. Challenges: Managing large volumes of entries, handling duplicate or misspelled names, and ensuring timely incorporation of updates.

AML Program – Term: AML Program. Related terms: CMU, risk assessment, training. Definition: A comprehensive set of policies, procedures, controls, and resources designed to prevent and detect money laundering and terrorist financing within an organization. Example: The AML program outlines the CMU's responsibilities, monitoring methodology, and reporting hierarchy. Practical application: The program is reviewed annually and adjusted based on emerging risks. Challenges: Ensuring program effectiveness, maintaining board engagement, and allocating sufficient budget for technology and staff.

Compliance Governance – Term: Compliance Governance. Related terms: board oversight, CMU, policy framework. Definition: The structures, policies, and processes that ensure compliance activities are aligned with organizational objectives and regulatory expectations. Example: The governance framework assigns the CMU as the operational hub, while the compliance committee provides strategic direction. Practical application: Clear lines of responsibility enable effective risk escalation and decision-making. Challenges: Avoiding siloed functions, achieving consistent oversight across subsidiaries, and integrating governance with enterprise risk management.

Customer Risk Rating – Term: Customer Risk Rating. Related terms: risk scoring, CMU, risk tier. Definition: A quantitative or qualitative assessment that categorises customers based on their propensity for AML risk, often expressed as low, medium, or high. Example: A client in the gambling sector with complex ownership receives a high risk rating, prompting the CMU to apply stricter monitoring thresholds. Practical application:

Risk ratings drive the intensity of monitoring and frequency of reviews. Challenges: Maintaining rating accuracy over time, handling dynamic risk factors, and ensuring transparency in rating methodology.

Data Governance – Term: Data Governance. Related terms: data quality, CMU, master data management. Definition: The set of policies, standards, and processes that manage the availability, usability, integrity, and security of data used for compliance purposes. Example: The CMU establishes data ownership rules to ensure that client information is accurate and consistent across systems. Practical application: Strong data governance reduces false positives and supports regulatory reporting. Challenges: Coordinating across IT, business units, and compliance, and securing executive sponsorship.

Escalation Protocol – Term: Escalation Protocol. Related terms: incident management, CMU, senior management. Definition: A predefined process for raising suspicious findings or compliance breaches to higher levels of authority for timely decision-making. Example: When the CMU generates a high-severity alert, the protocol mandates immediate notification of the Head of AML and the board's risk committee. Practical application: Clear escalation pathways ensure rapid response and documentation. Challenges: Avoiding bottlenecks, defining severity thresholds, and maintaining clear communication channels.

False Positive – Term: False Positive. Related terms: alert fatigue, CMU, scenario tuning. Definition: An alert generated by the monitoring system that initially appears suspicious but, upon investigation, is determined to be legitimate activity. Example: A legitimate bulk payroll payment triggers a high-value alert, later classified as a false positive. Practical application: Reducing false positives improves operational efficiency and analyst focus. Challenges: Balancing sensitivity with specificity, continuous scenario refinement, and training analysts to differentiate genuine risks.

Financial Intelligence Unit (FIU) – Term: Financial Intelligence Unit. Related terms: SAR, CMU, regulatory authority. Definition: A national agency responsible for receiving, analyzing, and disseminating financial information related to suspected money laundering or terrorist financing. Example: The CMU forwards a SAR to the FIU, which then shares relevant intelligence with law enforcement. Practical application: FIUs provide feedback on the quality of SARs and may issue guidance on emerging threats. Challenges: Maintaining timely communication, ensuring confidentiality, and adapting to FIU-driven regulatory changes.

KYC Refresh – Term: KYC Refresh. Related terms: ongoing due diligence, CMU, risk re-assessment. Definition: The periodic review and update of a client's KYC information to ensure that data remains accurate and risk assessments stay current. Example: The CMU schedules a KYC refresh for all high-risk clients every twelve months. Practical application: Refreshes trigger re-evaluation of monitoring parameters and risk ratings. Challenges: Client resistance to providing additional documentation, resource constraints, and coordination across business units.

Liquidity Risk – Term: Liquidity Risk. Related terms: operational risk, CMU, cash flow monitoring. Definition: The risk that an institution cannot meet its short-term financial obligations due to insufficient liquid assets. Example: While not a primary AML focus, the CMU monitors large cash withdrawals that could indicate structuring intended to evade detection. Practical application: Integration of liquidity monitoring with AML controls can reveal unusual cash movement patterns. Challenges: Distinguishing legitimate liquidity needs from illicit cash usage, and aligning monitoring with treasury functions.

Money Laundering Typology – Term: Money Laundering Typology. Related terms: pattern recognition, CMU, scenario development. Definition: A documented method or scheme used by criminals to disguise the origins of illicit funds, often categorized by industry, geography, or product. Example: The CMU incorporates the “smurfing” typology—multiple small cash deposits—to calibrate detection rules. Practical application: Typologies guide the creation of monitoring scenarios and analyst training. Challenges: Keeping typologies up-to-date, adapting to novel schemes, and avoiding over-reliance on historical patterns.

Operational Risk – Term: Operational Risk. Related terms: process failure, CMU, control weakness. Definition: The risk of loss resulting from inadequate or failed internal processes, people, systems, or external events. Example: An outdated transaction monitoring system causes delayed alerts, representing operational risk for the CMU. Practical application: Operational risk assessments identify gaps in monitoring workflows and drive remediation. Challenges: Measuring risk in qualitative terms, ensuring cross-functional collaboration, and maintaining resilience against cyber threats.

Policy Exception – Term: Policy Exception. Related terms: risk waiver, CMU, governance. Definition: A documented deviation from established compliance policies, granted under specific circumstances and subject to higher-level approval. Example: The CMU approves a temporary increase in transaction threshold for a strategic client, documenting the exception and associated controls. Practical application: Exceptions are tracked, reviewed, and revoked when no longer justified. Challenges: Preventing abuse, ensuring proper documentation, and monitoring the impact of exceptions on overall risk.

Regulatory Change Management – Term: Regulatory Change Management. Related terms: compliance updates, CMU, policy revision. Definition: The systematic process of identifying, assessing, and implementing changes required by new or amended regulations. Example: When a jurisdiction introduces a new AML directive, the CMU updates its monitoring rules and training curriculum accordingly. Practical application: Change management ensures that compliance programs remain current and effective. Challenges: Rapidly evolving regulatory landscape, resource allocation for implementation, and communicating changes across the organization.

Risk Assessment – Term: Risk Assessment. Related terms: risk matrix, CMU, risk appetite. Definition: The systematic identification, evaluation, and prioritisation of risks that could affect an institution’s ability to meet its AML obligations. Example: The CMU conducts an annual AML risk assessment covering customers, products, geographies, and delivery channels. Practical application: Assessment results shape monitoring scope, resource distribution, and policy development. Challenges: Data limitations, subjectivity in scoring, and integrating assessments with enterprise risk frameworks.

Sanctions Evasion – Term: Sanctions Evasion. Related terms: watch-list circumvention, CMU, layering. Definition: The act of deliberately disguising or routing transactions to avoid detection by sanctions screening mechanisms. Example: The CMU uncovers a scheme where funds are transferred through a chain of offshore entities to mask the ultimate beneficiary, who appears on a sanctions list. Practical application: Detection relies on advanced network analysis and pattern recognition. Challenges: Complex corporate structures, limited data visibility, and rapidly changing sanction regimes.

Transaction Threshold – Term: Transaction Threshold. Related terms: alert trigger, CMU, risk tier. Definition: A

predefined monetary value that, when exceeded, initiates a compliance alert for further review. Example: A \$25,000 cash deposit triggers an alert for a client with a medium risk rating. Practical application: Thresholds are calibrated based on risk appetite and typology. Challenges: Setting thresholds that balance detection with operational efficiency, and adjusting them for inflation or market changes.

User Access Controls – Term: User Access Controls. Related terms: role-based access, CMU, segregation of duties. Definition: Security measures that restrict system access to authorised personnel based on their job responsibilities. Example: The CMU configures the monitoring platform so that analysts can view alerts but cannot modify scenario parameters without senior approval. Practical application: Controls protect data integrity and mitigate insider risk. Challenges: Managing access rights across multiple systems, ensuring regular reviews, and preventing privilege creep.

Virtual Currency – Term: Virtual Currency. Related terms: cryptocurrency, CMU, AML compliance. Definition: A digital representation of value that functions as a medium of exchange, but does not have legal tender status. Example: The CMU extends its monitoring to transactions involving Bitcoin and Ethereum, applying rules for rapid wallet transfers. Practical application: Virtual currency monitoring requires blockchain analytics and address clustering. Challenges: Pseudonymity, high transaction velocity, and regulatory uncertainty.

Watch-List Screening – Term: Watch-List Screening. Related terms: sanctions screening, CMU, risk flag. Definition: The process of comparing client and transaction data against curated lists of sanctioned or high-risk entities to prevent prohibited dealings. Example: The CMU runs daily batch screening of all new customers against the UN, EU, and OFAC lists. Practical application: Screening is integrated into onboarding workflows and transaction processing engines. Challenges: Managing name-matching algorithms, handling partial matches, and ensuring timely list updates.

AML Audits – Term: AML Audits. Related terms: independent review, CMU, audit findings. Definition: Systematic examinations conducted by internal or external auditors to evaluate the effectiveness of an institution's AML controls and processes. Example: An AML audit identifies gaps in the CMU's transaction monitoring rule documentation. Practical application: Audit recommendations drive remediation plans and enhance compliance posture. Challenges: Scope definition, audit fatigue, and translating findings into actionable improvements.

Beneficial Ownership Registry – Term: Beneficial Ownership Registry. Related terms: UBO, CMU, public database. Definition: A centralized repository that records the identities of beneficial owners of legal entities, often mandated by law to increase transparency. Example: The CMU accesses the national registry to verify the UBO of a newly onboarded corporation. Practical application: Registries support risk assessment and ongoing monitoring. Challenges: Inconsistent data quality across jurisdictions, privacy restrictions, and limited global coverage.

Compliance Dashboard – Term: Compliance Dashboard. Related terms: key risk indicators (KRIs), CMU, visual analytics. Definition: An interactive reporting tool that consolidates real-time compliance metrics, alerts, and performance indicators for senior management. Example: The CMU's dashboard displays daily alert volumes, SAR filing status, and risk-adjusted monitoring coverage. Practical application: Dashboards

facilitate decision-making and resource allocation. Challenges: Data integration, avoiding information overload, and ensuring metric relevance.

Continuous Monitoring – Term: Continuous Monitoring. Related terms: real-time detection, CMU, automated controls. Definition: Ongoing, automated observation of transactions and client behaviour to promptly identify suspicious activity without reliance on periodic reviews. Example: The CMU implements a streaming analytics platform that evaluates each transaction as it occurs. Practical application: Enables immediate SAR filing and rapid response. Challenges: High computational demand, false-positive management, and maintaining system uptime.

Data Analytics – Term: Data Analytics. Related terms: pattern detection, CMU, machine learning. Definition: The application of statistical and computational techniques to extract insights, identify trends, and support decision-making in compliance monitoring. Example: Using clustering algorithms, the CMU discovers a network of accounts frequently transacting with the same offshore addresses. Practical application: Analytics enhance scenario design and prioritise investigations. Challenges: Data silos, model interpretability, and ensuring regulatory acceptance of advanced techniques.

Emerging Risk – Term: Emerging Risk. Related terms: new typology, CMU, risk horizon. Definition: A risk that is newly identified or evolving, often with limited historical data, requiring proactive assessment and mitigation. Example: The CMU flags the rise of DeFi (Decentralised Finance) platforms as an emerging AML risk. Practical application: Early identification informs scenario development and staff training. Challenges: Uncertainty, limited guidance, and rapid market changes.

False Negative – Term: False Negative. Related terms: missed detection, CMU, risk exposure. Definition: An instance where a monitoring system fails to generate an alert for activity that is actually suspicious. Example: A sophisticated layering scheme bypasses the CMU's rules, resulting in a false negative. Practical application: Reducing false negatives is critical to maintaining regulatory compliance. Challenges: Complex evasion techniques, limited visibility into hidden transactions, and balancing detection sensitivity.

Governance, Risk, and Compliance (GRC) – Term: Governance, Risk, and Compliance. Related terms: CMU, enterprise risk management, policy integration. Definition: An integrated approach that aligns governance structures, risk management processes, and compliance activities to achieve organizational objectives. Example: The CMU participates in the GRC framework by providing risk insights that shape policy updates. Practical application: GRC facilitates coordinated decision-making and resource optimisation. Challenges: Silos between functions, duplication of effort, and ensuring consistent reporting standards.

High-Risk Product – Term: High-Risk Product. Related terms: risk rating, CMU, product due diligence. Definition: A financial product or service that, by its nature, presents a greater likelihood of being used for money laundering or terrorist financing. Example: Private banking services with discretionary authority are classified as high-risk, prompting the CMU to apply enhanced monitoring. Practical application: Product risk informs client onboarding requirements and monitoring intensity. Challenges: Balancing profitability with risk controls, and updating risk classifications as products evolve.

Incident Response – Term: Incident Response. Related terms: escalation protocol, CMU, remediation.

Definition: The set of procedures followed when a compliance breach or suspicious activity is identified, aimed at containment, investigation, and corrective action. **Example:** Upon detecting a potential AML breach, the CMU initiates its incident response plan, involving legal, IT, and senior management. **Practical application:** Structured response reduces impact and supports regulatory reporting. **Challenges:** Coordination across departments, timely evidence preservation, and communication with authorities.

Jurisdictional Risk – Term: Jurisdictional Risk. **Related terms:** geographic risk, CMU, regulatory environment. **Definition:** The risk associated with operating in or dealing with entities from a particular country, based on its legal framework, enforcement effectiveness, and corruption levels. **Example:** Transactions involving a client from a jurisdiction with weak AML enforcement trigger additional scrutiny by the CMU. **Practical application:** Jurisdictional risk scores feed into client risk ratings. **Challenges:** Keeping abreast of political changes, sanctions updates, and differing legal standards.

Key Risk Indicator (KRI) – Term: Key Risk Indicator. **Related terms:** risk dashboard, CMU, performance metric. **Definition:** A measurable value that signals the level of risk exposure in a specific area, used to monitor trends and trigger early warning actions. **Example:** An increasing volume of alerts per high-risk client is a KRI that the CMU tracks. **Practical application:** KRIs support proactive risk management and resource planning. **Challenges:** Selecting meaningful indicators, avoiding data overload, and ensuring timely data collection.

Liquidity Monitoring – Term: Liquidity Monitoring. **Related terms:** cash flow analysis, CMU, transaction patterns. **Definition:** The observation of cash movements to detect abnormal patterns that could indicate money laundering, such as rapid inflows followed by swift outflows. **Example:** The CMU observes a surge in cash deposits then immediate transfers to offshore accounts, flagging potential layering. **Practical application:** Liquidity monitoring complements traditional transaction monitoring. **Challenges:** Differentiating legitimate business cash cycles from illicit activity, and integrating with treasury systems.

Money Laundering (ML) – Term: Money Laundering. **Related terms:** AML, CMU, layering. **Definition:** The process of disguising the origins of illegally obtained funds to make them appear legitimate, typically involving placement, layering, and integration stages. **Example:** A criminal places cash in a bank, layers through multiple transfers, and integrates the funds via a legitimate business. **Practical application:** Understanding the stages guides scenario design. **Challenges:** Detecting subtle layering steps, adapting to new money-laundering methods, and coordinating with law enforcement.

Operational Resilience – Term: Operational Resilience. **Related terms:** business continuity, CMU, system redundancy. **Definition:** The ability of an organization to continue delivering essential services during disruptions, including maintaining compliance monitoring functions. **Example:** The CMU maintains a secondary monitoring platform to ensure alerts are generated even if the primary system fails. **Practical application:** Resilience planning safeguards against technology outages and cyber incidents. **Challenges:** Cost of redundant infrastructure, testing recovery procedures, and ensuring data consistency across backup systems.

Policy Framework – Term: Policy Framework. **Related terms:** governance, CMU, procedural documentation. **Definition:** A structured collection of policies, standards, and procedures that define how an organization meets its compliance obligations. **Example:** The CMU's policy framework includes the AML policy,

transaction monitoring standards, and SAR filing procedures. Practical application: Provides clear guidance for staff and supports auditability. Challenges: Keeping policies current, avoiding overly complex documentation, and ensuring awareness across the organization.

Risk Mitigation – Term: Risk Mitigation. Related terms: control implementation, CMU, risk reduction. **Definition:** The process of applying controls, procedures, or actions to reduce the likelihood or impact of identified risks. **Example:** To mitigate high-risk client exposure, the CMU implements stricter transaction limits and more frequent reviews. **Practical application:** Mitigation measures are tracked and re-assessed for effectiveness. **Challenges:** Over-mitigation leading to operational friction, and measuring control efficacy.

Sanctions Compliance – Term: Sanctions Compliance. Related terms: watch-list screening, CMU, OFAC. **Definition:** The set of policies and procedures that ensure an institution does not engage in prohibited transactions with sanctioned individuals, entities, or jurisdictions. **Example:** The CMU verifies that a trade finance transaction does not involve a party listed on the EU sanctions list. **Practical application:** Integrated screening tools automate checks at multiple points in the transaction lifecycle. **Challenges:** Managing multiple sanction regimes, handling false positives, and staying current with rapid updates.

Structured Query Language (SQL) – Term: Structured Query Language. Related terms: data extraction, CMU, database management. **Definition:** A programming language used to manage and query relational databases, essential for retrieving data for compliance analysis. **Example:** An analyst writes an SQL query to pull all transactions above a certain amount for a specific client segment. **Practical application:** Enables ad-hoc reporting and deep dives into monitoring data. **Challenges:** Ensuring query performance on large datasets, and maintaining data security during extraction.

Transaction Pattern – Term: Transaction Pattern. Related terms: behavioral analytics, CMU, typology. **Definition:** A recurring sequence or characteristic of transactions that may indicate normal business activity or potential illicit behavior. **Example:** Regular small transfers to a foreign jurisdiction followed by a large inbound wire may signal a layering pattern. **Practical application:** Patterns are encoded into monitoring rules and used for anomaly detection. **Challenges:** Distinguishing benign patterns from suspicious ones, and updating patterns as client behaviour evolves.

Unusual Activity – Term: Unusual Activity. Related terms: alert generation, CMU, investigation. **Definition:** Any transaction or series of transactions that deviates from a client's typical behaviour, product norms, or known risk factors, warranting further scrutiny. **Example:** A low-risk retail client suddenly initiates a series of high-value international wire transfers. **Practical application:** Triggers alerts for analyst review and possible SAR filing. **Challenges:** Defining "unusual" across diverse client bases, and managing analyst workload.

Virtual Asset Transaction Monitoring – Term: Virtual Asset Transaction Monitoring. Related terms: blockchain analytics, CMU, AML. **Definition:** The process of analysing movements of cryptocurrencies and other digital assets to detect suspicious activity, using techniques such as address clustering, flow analysis, and risk scoring. **Example:** The CMU monitors wallet addresses that receive funds from multiple high-risk sources and then send them to mixers. **Practical application:** Supports compliance with emerging regulations on virtual assets. **Challenges:** Pseudonymity, rapid transaction speeds, and lack of standardized data formats.

Watch-List Management – Term: Watch-List Management. Related terms: list maintenance, CMU, screening frequency. Definition: The ongoing process of acquiring, updating, and curating sanction and high-risk entity lists used for compliance screening. Example: The CMU subscribes to a real-time feed of OFAC updates and integrates changes into the screening engine. Practical application: Ensures that screening is based on the latest information. Challenges: Reconciling conflicting data from multiple sources, and handling list volatility.

AML Training – Term: AML Training. Related terms: awareness program, CMU, competency assessment. Definition: Educational initiatives designed to inform staff about AML obligations, typologies, and internal procedures, fostering a culture of compliance. Example: The CMU conducts quarterly workshops for front-office staff on recognizing structuring techniques. Practical application: Training improves detection rates and reduces inadvertent violations. Challenges: Keeping content current, measuring effectiveness, and ensuring participation across all levels.

Compliance Culture – Term: Compliance Culture. Related terms: tone at the top, CMU, ethical standards. Definition: The collective attitudes, values, and behaviours within an organization that support adherence to laws, regulations, and internal policies. Example: Leadership openly discusses AML expectations, reinforcing a strong compliance culture that the CMU monitors through employee surveys. Practical application: A positive culture encourages proactive reporting of concerns. Challenges