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FOR LIFE INSURERS

# CEFLI
# 2017 Anti-Money Laundering (AML) Benchmarking Survey

**Benchmarking Survey Report**

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## Introduction

CEFLI is pleased to report the results of its 2017 Anti-Money Laundering (AML) Benchmarking Survey. As part of CEFLI's mission to serve the needs of the life insurance industry's compliance and ethics professionals, CEFLI has invited professionals from across the life insurance industry to participate in a variety of Surveys over the past several years to allow CEFLI to gauge the current state of practice with respect to specific compliance and ethics issues in the life insurance industry. The 2017 AML Benchmarking Survey was designed to capture data associated with current practices with respect to AML, antifraud and the filing of Suspicious Activity Reports (SARs) within the life insurance industry. This Report summarizes the key findings of the Survey.

## Purpose

The purpose of this Survey was to determine the current state of practices with respect to AML, antifraud and the filing of Suspicious Activity Reports (SARs) as part of life insurers' AML programs. Financial crimes continue to be a priority issue for state and federal regulators and life insurers have built robust systems designed to detect fraudulent schemes, reduce expenses and improve customer experience. The Survey provides a "snapshot-in-time" of current AML practices and SARs activity in the life insurance industry and establishes a benchmark for analyzing possible trends that may occur in the life insurance industry over the years ahead.

*FINRA and the SEC announced they will continue to focus examination activity on firms' anti-money laundering programs in 2017.*

To gauge current practice, the Survey asked objective questions designed to ascertain the nature and scope of AML/antifraud programs and recent SARs experience at respondent life insurance companies. Aspects covered included: activities encountered that may result in the submission of a SAR, trends in SARs filings, foreign national transactions, AML training, internal reporting and regulatory exam activity.

## Methodology

To complete its review, CEFLI solicited input from both CEFLI-member life insurance companies as well as non-CEFLI member companies. CEFLI received Survey responses from 73 life insurance companies across a range of company sizes.

## Characteristics of Respondents

### Company Size

Survey respondents were asked to identify the size of their organization based upon the number of overall employees. For purposes of this Survey, small life insurance companies were characterized as organizations with 500 or fewer employees, medium companies were characterized as organizations with 501-10,000 employees, and large companies were characterized as organizations with 10,001-50,000 employees. Survey responses were received from a broad range of companies including large life insurance companies (8%), medium companies (68%), and small companies (24%).

### Distribution Channels

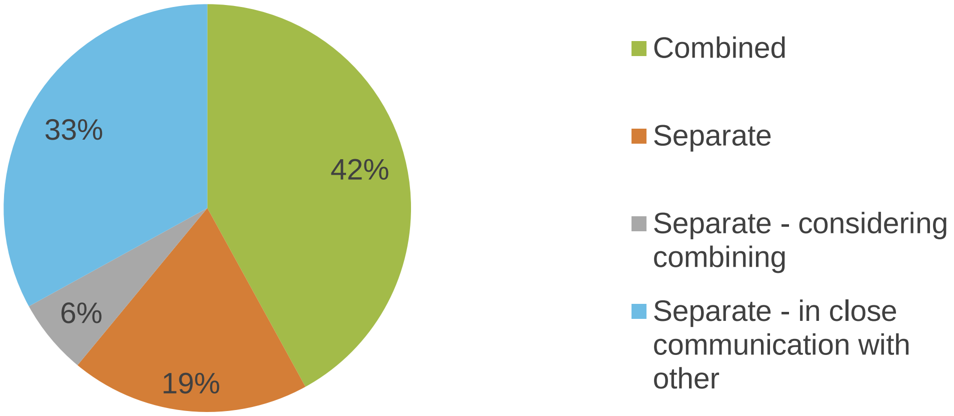
The Survey also sought to identify the various types of distribution systems used by companies in selling their products. The Survey results confirmed that companies use a broad range of distribution systems with most companies using more than one type of distribution. When analyzed by company size, the majority of small and medium companies indicated that they utilize independent producers, while many also reported utilizing captive, Broker-Dealer and bank distribution channels. Survey responses from large companies indicate they are more likely to distribute their products through Broker-Dealers or a captive salesforce, though many also reported that their company utilizes independent producers and bank distribution.

## Reporting Relationships

The Survey sought to gather information regarding the reporting relationships of individuals responding to the Survey. When asked to identify the department or division to which they report, the majority of Survey respondents (64%) answered that they report up to the Compliance Department or the Law Department (17%) at their life insurance company. The next largest grouping of Survey respondents (7%) answered that they report directly to a standalone Anti-Money Laundering or Antifraud Department/Division. Other Survey respondents indicated that they report to Risk Management, Senior Management or Associated Business Line Operations (4% in each case).

## Organizational Structure

When asked whether their organization maintained combined or separate AML and Antifraud units, the majority of Survey respondents (42%) reported that the two were combined, and some others (6%) indicated that, while currently separate, their company was considering combining the two units under one unit. Other Survey respondents (19%) indicated that the AML and Antifraud units are maintained separately within their company, while the remaining respondents (33%) described the two functions as separate units operating in close communication with the other.



Large companies were more likely to report maintaining separate AML and Antifraud units.

### Roles & Responsibilities

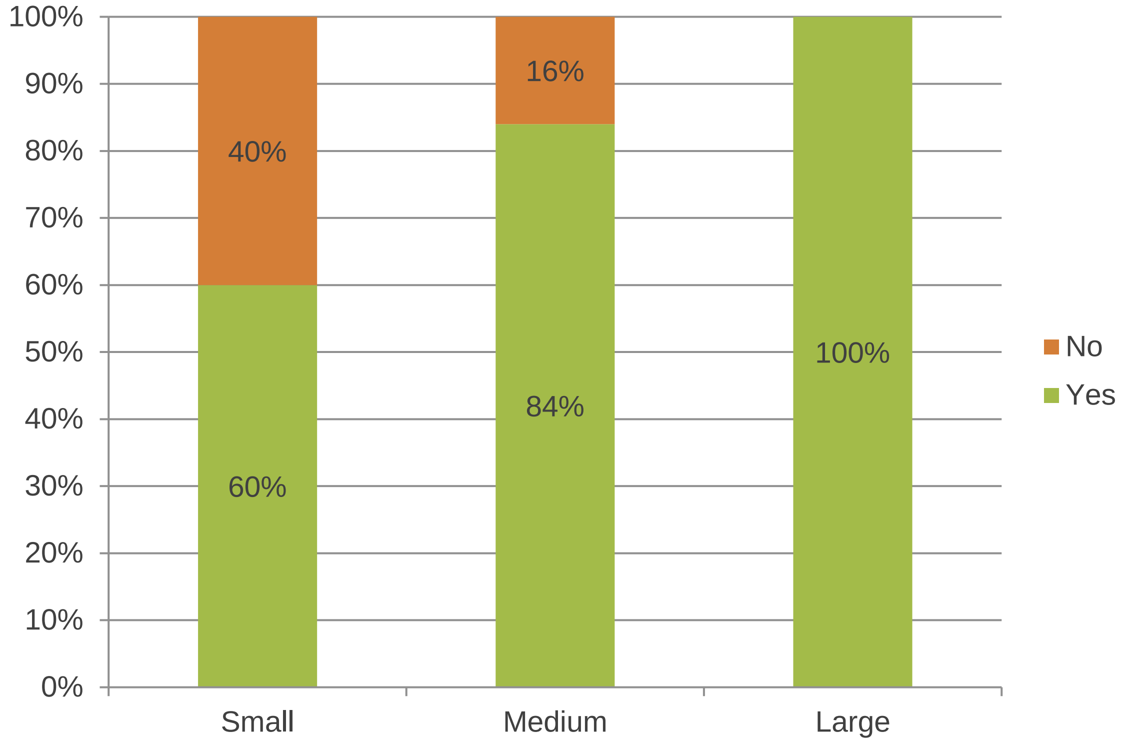
Survey respondents were asked to indicate whether their company's designated AML Compliance Officer's sole job responsibility was for AML and AML-related activities (e.g., antifraud) as opposed to being combined with other compliance responsibilities. The Survey results indicated that at the vast majority of companies (83%) the AML Compliance Officer is responsible for compliance activities beyond AML and antifraud. When analyzed by company size, it may not be surprising that Survey results indicate that no small company reported having an AML Compliance Officer solely dedicated to AML, while half of all large company respondents reported their AML Compliance Officer's sole responsibility was for AML and AML-related activities.

## AML Review

### Automated Monitoring

When asked whether their company utilizes some type of automated process when monitoring for AML activity, the overall majority of Survey respondents (81%) indicated they had an automated process and were roughly evenly split on whether the system was rule and/or scenario driven or based on exception reports. Just under a fifth of all Survey respondents (19%), however, reported that they did not have an automated process in place at this time for monitoring for AML activity.

While automated AML monitoring processes were more often reported at medium and large life insurance companies, the data indicates that this practice is in place at more than half of the small companies responding to the Survey.



## Types of Reports Monitored

The Survey asked respondents to identify the types of reports that are routinely monitored as part of their company's AML review process. Types of reports identified included:

- Cash or cash equivalents over a certain dollar amount:
- Early surrenders;
- Multiple policies;
- Frequent loans;
- Frequent withdrawals; and
- Foreign addresses.

While the majority of companies indicated reviewing all or most of these types of reports, reports most often monitored as part of the AML review process (in ranked order) were: early surrenders, receipt of cash or cash equivalence over a certain dollar amount, frequent withdrawals, frequent loans, foreign addresses and multiple policies. Other types of reports routinely monitored also include not taken, early loans and cancellations.

*Most life insurers routinely monitor multiple systems reports as part of the AML review process.*

## Cash Premiums

When asked to indicate if their company accepts cash premium payments, half (50%) of all Survey respondents reported that they do not accept cash or cash equivalents, while some others (23%) indicated they will accept money orders or traveler's checks. Of the companies who indicated they do accept cash premiums (27%), most limit the dollar value that can be paid by cash.

When analyzed by company size, it may be interesting to note that while the majority of small (60%) and medium (78%) companies indicated they do not accept cash premiums, large companies responding to the survey were evenly split (50%/50%) on the practice of accepting cash premium payments.

## Electronic Funds Transfers

Survey responses indicated that, while there are some life insurers who will accept Electronic Funds Transfers (EFTs) without a copy of a voided check, the majority of companies require either a voided check or some other validating documentation to establish the account is owned by the client.

## SARs Reporting

### Suspicious Activities that May Have Resulted in the Filing of a SAR

Survey respondents were asked to rank a list of different types of activities their company may have encountered that might result in a SAR being filed. The top five activities that were identified as most likely to result in a SAR filing were:

- Suspicious cash equivalents;
- Finding a questionable source of funds;
- Questionable disbursements – loan/surrender activity;
- Questionable transactions – out of pattern/no business purpose; and
- Structuring.

Additional activities that might lead to a SAR being filed included ID theft, false documentation/information, exploitation of seniors, avoidance of BSA record keeping requirements and cyber incidents, such as spear phishing and malware.

Activities least likely to result in SAR filing were:

- Excessive insurance;
- Suspicious life settlements;
- Collusion; and
- Unrelated third party transactions.

## SARs Decision-Making Process

When asked about the process for determining whether a SAR filing might take place in situations of suspected money-laundering activity, most companies (32%) indicated that the AML Unit would make this decision independently, while at other companies the AML Unit would consult with Compliance (22%) or Legal (20%) to make this decision.  At a significant number (26%) of responding companies, however, a SARs Committee approach, which may include representatives from AML, Compliance, Legal and the SIU, is employed to determine which cases may warrant the filing of a SAR.

*A significant number of life insurers indicate that their company employs a committee approach, which may include representatives from AML, Compliance, Legal and the SIU, to determine if a SAR will be filed.*

## Increase in Suspicious Activities

Slightly more than half (53%) of all Survey respondents indicated no recent increase in suspicious activities that might warrant a SAR filing.  However, for those companies who reported an increase/perceived increase in suspicious activities, ID theft and financial exploitation of seniors were the most common suspicious activities identified.

Company size did not appear to be an indicator of whether an increase in suspicious activities was reported.

*Companies cited ID theft and financial exploitation of seniors as the fastest growing categories of suspicious activities encountered*

## Cybersecurity Incidents

In October 2016, FinCEN published an Advisory to Financial Institutions on Cyber-Events and Cyber-Enabled Crime which may have contributed to a recent increase in suspected cybersecurity incidents reported by Survey respondents.

When asked how their company handled the reporting of cybersecurity events, the majority (45%) of Survey respondents indicated that the reporting of cybersecurity

events was coordinated by the company's Security Department or Chief Information Security Officer. At other companies the reporting of cybersecurity incidents is coordinated by the AML Unit (21%), Compliance Department or Chief Compliance Officer (19%), Legal Department or Chief Legal Officer (12%) or Risk Department or Chief Risk Officer (3%).

## State Fraud Reports

Companies are required to report perceived instances of fraud to state regulatory authorities. Some perceived fraud activity also may trigger a SAR filing.

When asked to indicate how often a state fraud report also results in a SAR filing by their company, nearly half (47%) of all Survey respondents reported that a state fraud report rarely (less than 20% of the time) resulted in a SAR filing and 21% responded that they had never filed a SAR in relation to a state fraud report. Other Survey respondents (25%) reported that they sometimes (20%-50% of the time) file a SAR concerning a state fraud matter, though only 7% of Survey respondents would file in most cases (more than 50% of the time) where a state fraud report is made.

# Trends in SARs Filings

## Number of SARs Filed Annually

The Survey asked respondents to indicate the approximate number of SARs filed by their company on an annual basis. Overall results indicated that over two-thirds (68%) of respondent companies file fewer than 10 SARs in a year. When analyzed according to company size, all small companies, the majority (66%) of medium companies and even some (17%) large companies indicated that they file fewer than 10 SARs per year. However, other medium size company respondents indicated filing as many as 101-250 SARs and the majority of large size companies indicated filing upwards of 101 to over 250 SARs on an annual basis.

## Year-to-Year Increase

The Survey asked respondents to indicate if their company had seen an increase in SAR submissions when comparing data from 2013 to present time. While the majority (56%) of Survey respondents reported no increase, a significant number (44%) of all respondents reported an increase in SAR submissions by their life insurance company since 2013. Medium and large companies were more likely to report seeing an increase in their SARs submissions in the last three years.

*The majority of Survey respondents reported no increase in SARs submissions since 2013.*

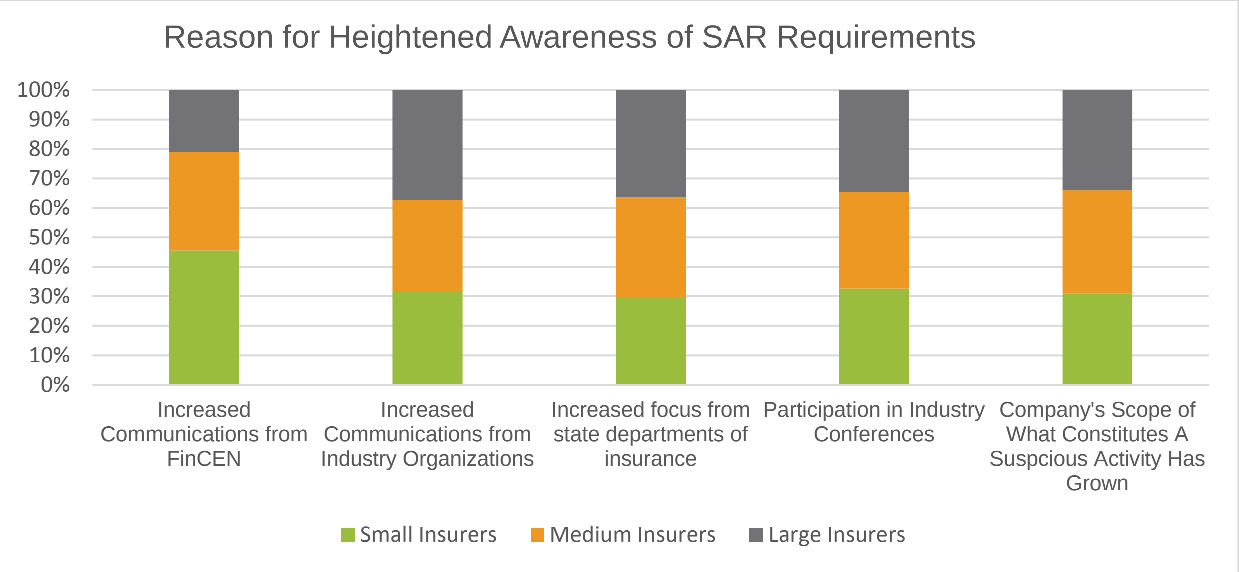
Companies that reported experiencing an increase in SARs submissions since 2013 were asked to rank three possible reasons such an increase had taken place. The three most common reasons identified were:

- Perceived increase in suspicious activity.
- Heightened awareness of reporting requirements.
- Growth in the scope of what the company interpreted as suspicious behavior.

Survey responses varied by company size. While small company respondents identified each of the three reasons in roughly equal proportions, the majority of medium (57%) and large (67%) companies ranked a heightened awareness of reporting requirements as the number one reason behind their companies' increase in SAR submissions since 2013.

## Heightened Awareness

When asked to rank possible reasons why their company had a heightened awareness of reporting requirements, Survey respondents from medium and large insurers ranked increased communications from FinCEN and increased communications from industry organizations as chief contributors to their heightened awareness of reporting requirements. Most small company respondents indicated that their company's heightened awareness of reporting requirements was primarily due to a growth in their company's interpretation of the scope of what may constitute a suspicious activity. Additionally, insurers of all sizes, also ranked participation in industry conferences where SARs were discussed as a significant reason for their company's heightened awareness of reporting requirements.



# Foreign Nationals

## Sales to Foreign Nationals

The Survey sought to gather information about business activities with foreign nationals. Some companies indicated that they do not currently allow foreign national business.

When asked whether their company had experienced an increase in foreign national business (such as transactions involving a temporary resident of the US) over the past two years, three quarters (75%) of Survey respondents indicated they had not experienced an increase in foreign national business. However, one quarter (25%) of Survey respondents reported an increase in foreign national business over the past two years. Medium and large companies were more likely to have reported an increase in foreign national business.

The Survey results also show that some companies have taken steps to control for a perceived/actual heightened risk associated with sales to foreign nationals. Such steps may include new underwriting/ID validation requirements, accepting foreign national business only for select countries or accepting it on an exception basis only.

The Survey also sought to gather information about the minimum forms of identification required to validate the identity of a foreign national policy owner. A large majority (82%) of Survey respondents indicated that a social security number or individual tax ID is the minimum form of identification their company requests to validate a foreign national policy owner. Other forms that may meet the minimum requirement at some companies include: copies of passports or visas, information pertaining to US assets and bank accounts, and driver's licenses.

*Some companies have taken steps to control for a perceived/actual heightened risk associated with sales to foreign nationals.*

## OFAC

The Survey asked respondents if their company screens beneficiaries against data provided by the Office of Foreign Assets Control (OFAC). The majority (57%) of companies indicated they conduct OFAC screens on beneficiaries prior to payment of claims. This answer was consistent for all company sizes.

For companies that do screen beneficiaries against OFAC data at times other than prior to payment of claim, they were most likely to do so according to the following events:

- After policy issue;
- Prior to policy issue;
- After a beneficiary change;
- Prior to a beneficiary change, as part of a regular screen of the block of business (either daily, weekly or monthly); or
- When OFAC issues an updated list.

# AML Training

## Required AML Training

Life insurance companies have different policies regarding who may be required to undergo AML training. When asked about their company's AML training requirements, the majority (58%) of Survey respondents reported that they require all producers and only those home office employees who are routinely involved in financial transactions to undergo AML training. Other companies (31%) require all producer and all home office staff to undergo training. Some respondent companies also require AML training for employees of third party administrators without a formal AML program and other select staff.

## Producer Training

Producers have a variety of resources available to fulfill their AML training requirements. The most commonly cited approved AML training for producers was offered through LIMRA (71%) followed by internally developed training courses (61%) and training offered by RegEd (34%). Some companies reported having approved as many as 15 AML courses as meeting their required AML training, including those offered by Success CE, Web CE, Sandi Kruise, Kaplan, Quest and FINRA.

The Survey results indicated that companies who offer training internally will rely upon company-generated reports to track completion of AML training, while those who utilize a vendor for training purposes are more likely to rely upon reports from vendors providing the training. Some companies reported that producers are responsible for providing certification that training is completed.

The majority of small and medium company respondents indicated that they require producers to refresh their AML training once every two years though some require it every year or once every three years. Large company respondents' producers are generally required to refresh their AML training annually.

## Employee Training

Survey data indicates that AML training for home office employees is largely offered internally via computer-based training or in-person training.  A number of small and medium companies also reported utilizing LIMRA's AML training for home office staff, and a few others utilize training programs offered by RegEd or LRN.

Large companies were most likely to have developed their own internal AML training for employees.

The vast majority of companies require home office employees to refresh their AML training annually (60%) or once every two years (30%).

## AML Reports to Senior Management

The Survey sought to collect information regarding AML reporting to senior management or the board of directors.

It was encouraging to note that nearly all Survey respondents (92%) indicated that their company's AML process included reporting on the status of the AML program (e.g., number of SARs filed) to senior management or the board of directors.

*Nearly all Survey respondents (92%) indicated that their company's AML process included reporting on the status of the AML program to senior management or the board of directors.*

For those companies who report on AML to senior management or the board, the reports are most often made by the company's Chief Compliance Officer or the Audit Committee, though at a few companies reporting is handled by an AML Steering Committee.

The frequency of internal AML reports to senior management or the board of directors is most often annually, though large companies are most likely to report more frequently than annually.

## Examinations

The Survey also gathered information concerning whether Survey respondent companies have been subject to AML examination activity.

Over half (52%) of the Survey respondent companies indicated that they had been subject to AML examination activity. Small companies were least likely to report having been subject to AML exam activity.

The examining entity was most often reported to be the IRS (31%), and this was the only type of exam activity indicated by small companies. A significant number of companies (29%) also reported having been subject to AML examination activity by a state department of insurance. Other examining entities reported less frequently included FINRA, the SEC, Foreign Regulators and the Federal Reserve (for life insurers who are a bank holding company).

Survey respondents also identified key areas of review during AML examination activity. The Survey responses indicated examiners are most likely to conduct a review of the AML program (policies and procedures) to verify it includes the necessary components. Other areas commonly reviewed included (in order of priority):

- Requesting/reviewing copies of AML risk assessments;
- Requesting copies of independent test plans/results of testing performed; and
- Reviewing implementation and tracking of completion of AML training.

When asked whether their company had experienced an increase in AML examination activity, the overwhelming majority (87%) of Survey respondents reported they had not. For those companies that reported experiencing an increase, the reasons were primarily the annual AML review required by the Federal Reserve (for life insurers who are also bank holding companies), or in a few cases involving global insurers, an attempt by foreign regulators to align with international standards.

## Summary

CEFLI's 2017 Anti-Money Laundering (AML) Benchmarking Survey serves as a way to gauge the current state of practice with respect to AML, antifraud and the filing of Suspicious Activity Reports (SARs) as part of life insurers' AML programs within the life insurance industry. By establishing this benchmark, this information can be used to track possible changes in SARs activity and can aid in the analysis of possible trends that may occur in the life insurance industry over the years ahead.

Financial crimes continue to be a priority issue for state and federal regulators and Survey results confirmed that life insurers have built robust systems designed to detect fraudulent schemes, reduce expenses and improve customer experience. At most life insurers the AML function reports to Compliance and a large majority of Survey respondent companies have adopted a coordinated approach to address financial crimes and report that their organization's AML Unit and Antifraud Unit have joined forces and/or maintain close communication with one another.

The Survey results also demonstrate that life insurers have developed unique AML review processes that are tailored to the different types of distribution systems the company uses to distribute their products.

While it may be too soon to determine whether the establishment of the role of Chief AML Compliance Officer is a growing trend within the life insurance industry, we were pleased to see that many companies (mainly larger companies) have demonstrated industry leadership by appointing a senior officer whose sole job responsibility is for AML and AML-related activities (e.g., antifraud) as opposed to being combined with other compliance responsibilities.

*FINRA and the SEC announced they will continue to focus examination activity on firms' anti-money laundering programs in 2017.*

The majority of life insurers rely upon some type of automated process to monitor for AML activity, which may be rule and/or

scenario driven or based on exception reports. And while automated AML monitoring processes were more often reported at medium and large life insurance companies, the data indicates that this practice is even in place at more than half of the small companies responding to the Survey. Whether automated or manual, life insurers' AML systems routinely monitor multiple reports as part of the AML review process. Reports detailing early surrenders, receipt of cash or cash equivalence over a certain dollar amount, frequent withdrawals, frequent loans, foreign addresses and multiple policies serve as key componenets of overall AML montoring programs.

Life insurers also have established thresholds for the acceptance of premium payments. These include, among other practices, not accepting cash or cash equivalents, limiting the dollar value that may be paid in cash, and requiring a copy of voided check or other account validating information with Electronic Funds Transfers.

While more than half of all Survey respondents indicated no recent increase in suspicious activities that might warrant a SAR filing, those companies who did report an increase/perceived increase cited ID theft and financial exploitation of seniors as the fastest growing category of suspicious activities encountered. Additional activities that commonly lead to a SAR being filed included:

- Suspicious cash equivalents;
- Finding a questionable source of funds;
- Questionable disbursements – loan/surrender activity;
- Questionable transactions – out of pattern/no business purpose; and
- Structuring.

The decision to file a SAR is a consultative process at most companies, with Compliance or Legal signing off on the recommendation of the AML Unit. At a significant number of life insurers, however, a SARs Committee approach, which may include representatives from AML, Compliance, Legal and the SIU, is employed to determine which cases may warrant the filing of a SAR.

Survey responses suggest that FinCEN's 2016 Advisory to Financial Institutions on Cyber-Events and Cyber-Enabled Crime may have contributed to a recent increase in suspected cybersecurity incidents by life insurers. At most companies the reporting of cybersecurity events is primarily coordinated by the Security Department or Chief Information Security Officer. While companies are required to report perceived instances of fraud to state regulatory authorities, it is rare that perceived fraud activity also may trigger a SAR filing.

Though some medium and large life insurers may file over 100 SARs in a year, it was encouraging to learn that over two-thirds of all Survey respondents file fewer than 10 SARs in a year. While FinCEN statistics have indicated a significant year-to-year increase in the number of SARs submitted by the overall insurance sector, the Survey found that a majority of respondent life insurance companies of all sizes noted no increase since 2013. Medium and large companies were more likely to report seeing an increase in their SARs submissions in the last three years.

Companies that reported experiencing an increase in SARs submissions since 2013 were asked to rank three possible reasons such an increase had taken place. The three most common reasons identified were:

- Perceived increase in suspicious activity.
- Heightened awareness of reporting requirements.
- Growth in the scope of what the company interpreted as suspicious behavior.

*Increased SARs by other sectors of the insurance industry, such as P&C insurers, may be contributing to the significant growth reported by FinCEN.*

Responses differed by company size with small company respondents identifying each of the three reasons in roughly equal proportions, while the majority of medium and large companies ranked a heightened awareness of reporting requirements as the primary reason behind their companies' increase in SAR submissions since 2013.

When asked to rank possible reasons why their company had a heightened awareness of reporting requirements, Survey respondents from medium and large insurers ranked increased communications from FinCEN and increased communications from industry organizations as chief contributors to their heightened awareness of reporting requirements. Most small company respondents indicated that their company's heightened awareness of reporting requirements was primarily due to a growth in their company's interpretation of the scope of what may constitute a suspicious activity. Many life insurers also credited communications from industry organizations and participation in industry conferences where SARs were discussed as a significant reason for their company's heightened awareness of reporting requirements.

The Survey also gathered data concerning life insurers experience with foreign national business. Only 25% of Survey respondents, primarily medium and large life insurers, indicated an increase in this foreign national type of business over the past two years. The majority of companies who accept foreign national business routinely require a social security number or individual tax ID as the minimum form of verification of identity. While some companies employ additional safeguards, such as accepting foreign national business only for select countries or on an exception basis only, others refuse foreign national business altogether.

The majority of companies particpating in the Survey, regardless of size, indicated that they screen beneficiaries against data provided by the Office of Foreign Assets Control

(OFAC) prior to payment of claims. A number of companies also screen beneficiaries against OFAC data at other times, including (in tranked order):

- After policy issue,
- Prior to policy issue,
- After a beneficiary change,
- Prior to a beneficiary change, as part of a regular screen of the block of business (either daily, weekly or monthly), or
- When OFAC issues an updated list.

Life insurers have developed appropriate AML training practices, with the majority of Survey respondents requiring both producers and home office employees who are routinely involved in financial transactions to undergo AML training. Some companies have expanded AML training efforts to include all home office staff and employees of third party administrators without a formal AML program.

Producers have a variety of resources available to fulfill their AML training requirements and some life insurers reported having approved as many as 15 courses for required AML training. The most commonly cited approved AML training for producers was offered through LIMRA, followed by internally developed training courses and training offered by RegEd. Depending on how the training is obtained, tracking completion of AML training is done either internally or by receiving reports from vendors providing the course. The majority of small and medium companies require producers to refresh their AML training once every two years. Large company respondents' producers are generally required to refresh their AML training annually.

AML training for home office employees is generally offered internally via computer-based or in-person training. A number of small and medium companies also reported

utilizing LIMRA's AML training or another third-party course for home office staff. The vast majority of companies refresh AML training of home office employees on an annual basis.

The Survey sought to collect information regarding possible AML reporting to senior management or the board of directors. It was encouraging to note that nearly all Survey respondents indicated that their company's AML process includes reporting on the status of the AML program to senior management or the board of directors. Internal AML reports to senior management or the board of directors are most often made annually, though large companies are likely to report more frequently. Internal AML reports are most often made by the company's Chief Compliance Officer or the Audit Committee, though at a few companies reporting is handled by an AML Steering Committee.

Finally, the Survey asked whether life insurers have been subject to AML examination activity. Survey results indicate that over half of responding companies, mostly medium and large insurers, had been subject to AML examination activity, conducted primarily by the Internal Revenue Service or a state department of insurance. Other examining entities reported less frequently included FINRA, the SEC, Foreign Regulators and the Federal Reserve (for life insurers who are a bank holding company). Key areas of review during AML examination activity included (in order of priority):

- Review of the AML program (policies and procedures) to verify it includes the necessary components;
- Requesting/reviewing copies of AML risk assessments;
- Requesting copies of independent test plans/results of testing performed; and
- Reviewing implementation and tracking of completion of AML training.

Overall, the 2017 Anti-Money Laundering (AML) Benchmarking Survey affirms that life insurers are taking appropriate steps to monitor and report suspected financial crimes. By proactively implementing robust AML programs, the life insurance industry will continue to improve their detection of fraudulent schemes, reduce expenses and improve customer experience.

* * * * * *

***CEFLI would like to thank all compliance and ethics professionals from CEFLI Member Companies as well as non-CEFLI Member Companies who responded to the 2017 Anti-Money Laundering (AML) Benchmarking Survey for offering their insights and perspectives. We hope that all Survey respondents find this information to be useful.***

# THE FORUM THAT CONNECTS.

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