RISK &
COMPLIANCE
DOW JONES

2015 Global Anti-Money Laundering Survey Results
Detailed Report

Consumer Insights
March 2015

Prepared by:

WRG
WELCHANS RESEARCH GROUP

AML Survey Methodology

- This online survey was conducted by Dow Jones Risk & Compliance in conjunction with the Association of Certified Anti-Money Laundering Specialists (ACAMS).

- AML is a maturing market and there is a need to understand how companies are dealing with the current regulatory environment and to assess how new regulations are impacting the way companies work.

- The Global Anti-Money Laundering survey was conducted for the first time in 2011 to establish a sense of this market. Subsequent surveys in 2012, 2013 and 2015 (this report) tracked key measures and looked at other issues that emerged.

- The key objectives of this survey are to:
  – Assess the current regulatory environment
  – Deepen understanding of client-screening processes, content and systems
  – Explore emerging issues related to regulatory expectations, data cleansing, fraud detection and sanctioned lists
  – Trend key measures from previous AML Surveys

- Survey invitations were sent via email to ACAMS' global membership of AML specialists. A total of 1,118 surveys were completed for 2015, including:
  – 818 in Americas
  – 166 in EMEA
  – 134 in Asia-Pacific

- 2015 total results are compared to previous surveys to measure trends; statistically significant differences between 2013 and 2015 are noted with arrows.
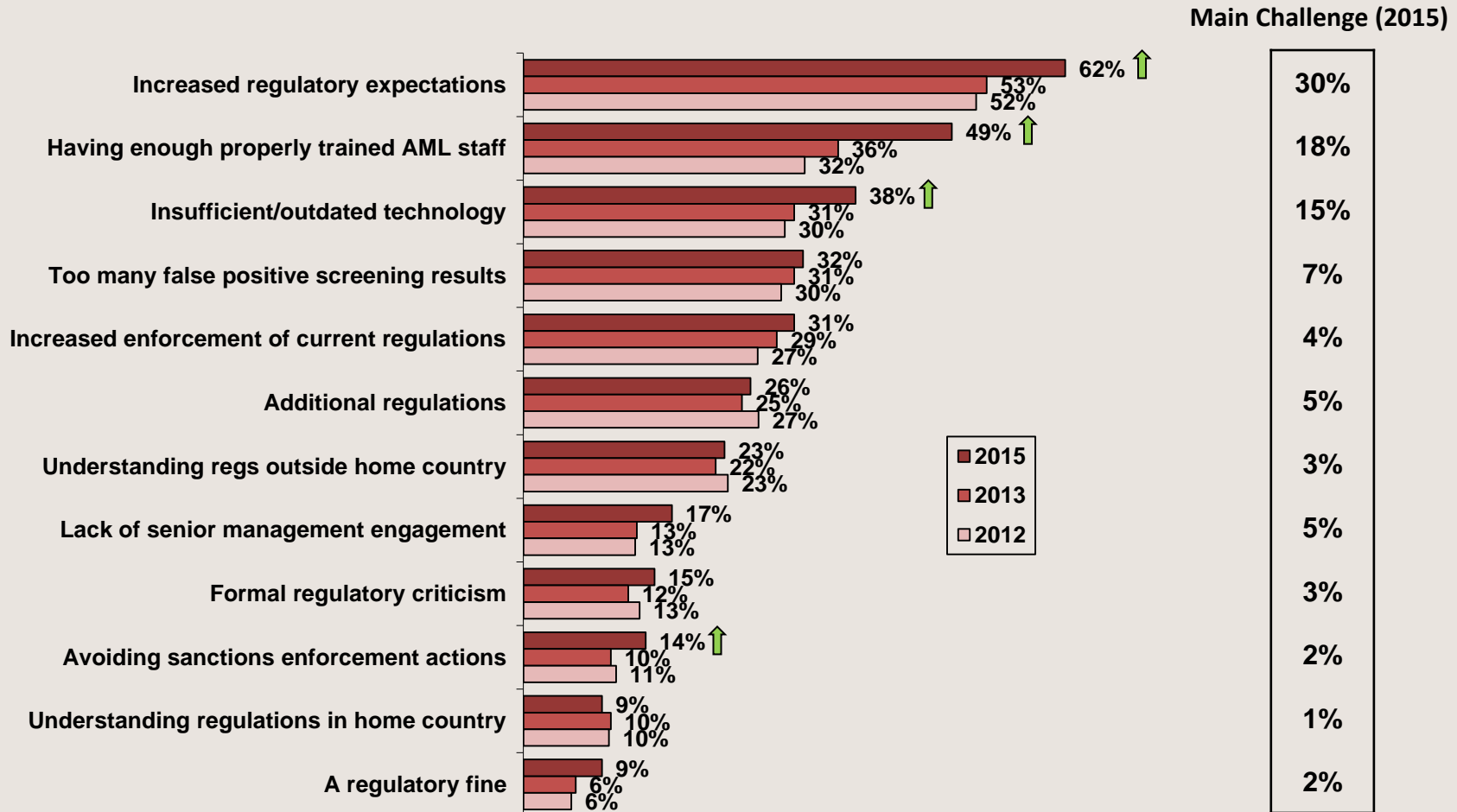
Key Findings

- **Increased regulatory expectations** continue to represent the greatest **AML compliance challenge**.
  - **Shortages of trained staff** and **technology concerns** have become more widespread challenges.
- Three-quarters of AML professionals report **increased personal workloads**.
  - **FATCA** and **Dodd-Frank** are the main drivers. **Ukraine**-related sanctions also have added to workloads.
  - FATCA has affected **client-onboarding processes** among over 70% of respondents.
- **Data accuracy is the single "most important" factor** in choosing AML data providers.
  - More respondents are using **multiple AML data providers**, often for better **comprehensiveness**.
  - Two-thirds are **"extremely" or "very confident" in the data accuracy** of their primary data provider.
  - Nearly 90% **test the quality of data** from their client-screening data providers.
- Three-quarters screen for **domestic PEPs**; among them, nearly 90% also screen for **local-level PEPs**.
- More than 85% of respondents work in companies with **client-screening technology solutions** in place.
  - More now have Government Risk & Compliance **(GRC) platforms** in place.
- Over 60% of respondents report their companies have **"cleansed" customer data** in the past six months.
- Over 70% adhere to standards of either 10% or 25% **beneficial ownership verification**.
- About 85% expect internal lists to be updated within 24 hours of changes to **sanctioned/official lists**.
- More than one-third of respondents report their companies have **exited a full business line or segment** of business in the past 12 months **due to perceived regulatory risk** and/or the organization's **inability to manage the risk**.
- **ACAMS Today** remains the most widely read compliance publication among ACAMS members.
  - Readership of ACAMS moneylaundering.com increased again in 2015.
- **ACAMS Las Vegas and ACAMS moneylaundering.com** were the most attended major conferences.
  - About 45% of respondents attended local seminars and conferences in the past year.
- Keeping up with industry trends and changes in laws/regulations are the **key reasons for attending conferences**.

AML Challenges & Workloads

AML Compliance Challenges Faced by Organizations

Increased regulatory expectations continue to represent the greatest AML compliance challenge, cited by over 60% of respondents. Shortages of trained staff and technology concerns became more widespread in 2015 compared with 2013.

Main Challenge (2015)

Challenge	2015	2013	2012	Main Challenge (2015)
Increased regulatory expectations	62% ⬆	53%	52%	30%
Having enough properly trained AML staff	49% ⬆	36%	32%	18%
Insufficient/outdated technology	38% ⬆	31%	30%	15%
Too many false positive screening results	32%	31%	30%	7%
Increased enforcement of current regulations	31%	29%	27%	4%
Additional regulations	26%	25%	27%	5%
Understanding regs outside home country	23%	22%	23%	3%
Lack of senior management engagement	17%	13%	13%	5%
Formal regulatory criticism	15%	12%	13%	3%
Avoiding sanctions enforcement actions	14% ⬆	10%	11%	2%
Understanding regulations in home country	9%	10%	10%	1%
A regulatory fine	9%	6%	6%	2%

Legend:
- 2015
- 2013
- 2012

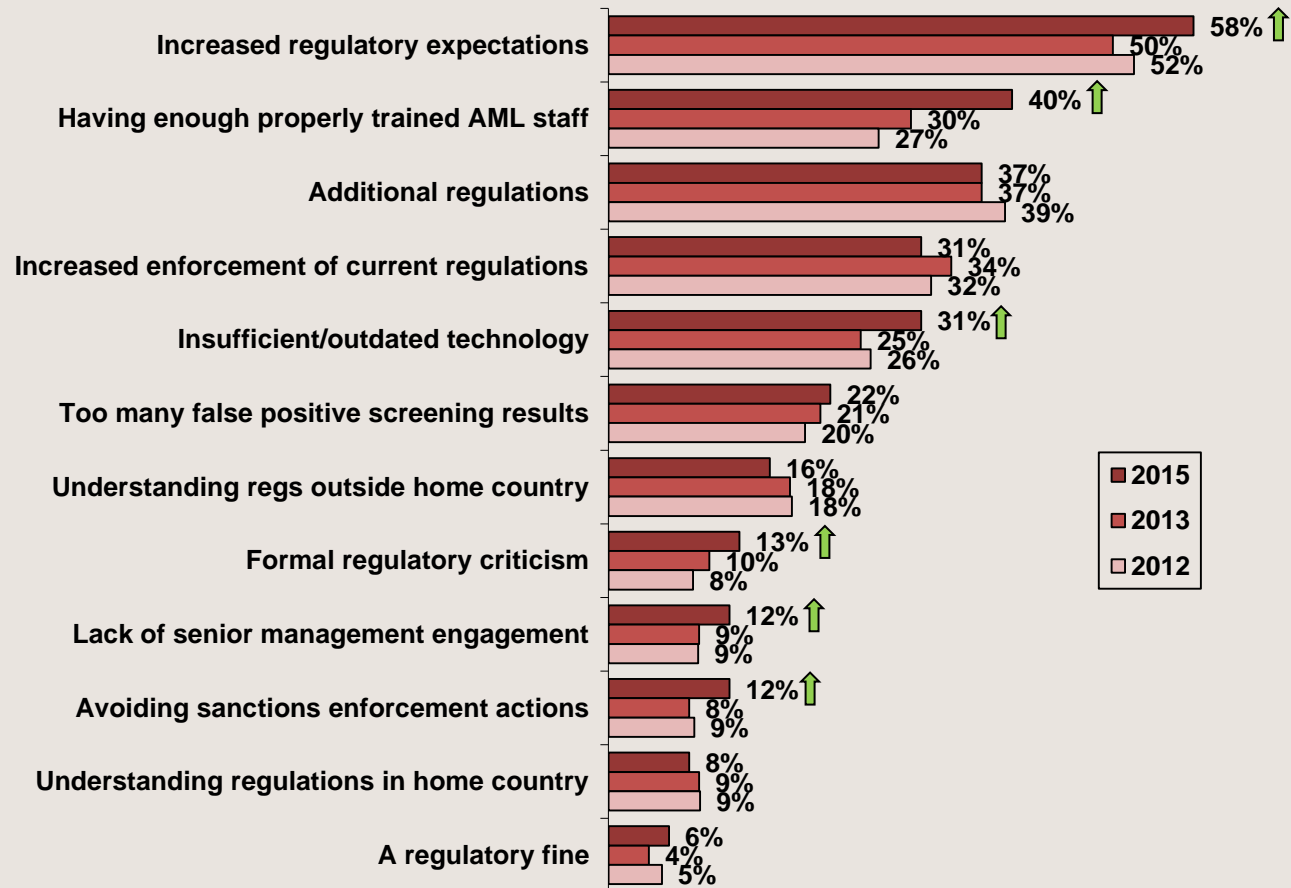4. Which of the following AML compliance challenges is your organization currently facing?
5. And, which of these is currently your organization's greatest AML compliance challenge?
Base: Total: 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)

Green and **Red** arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

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AML Compliance Challenges in Next 12 Months

Increased regulatory expectations and shortages of trained staff continue to be the key future challenges for AML professionals, with more mentioning these challenges in 2015 than in 2013. Additional regulations, increased enforcement and technology concerns are mentioned by more than 30% of respondents.

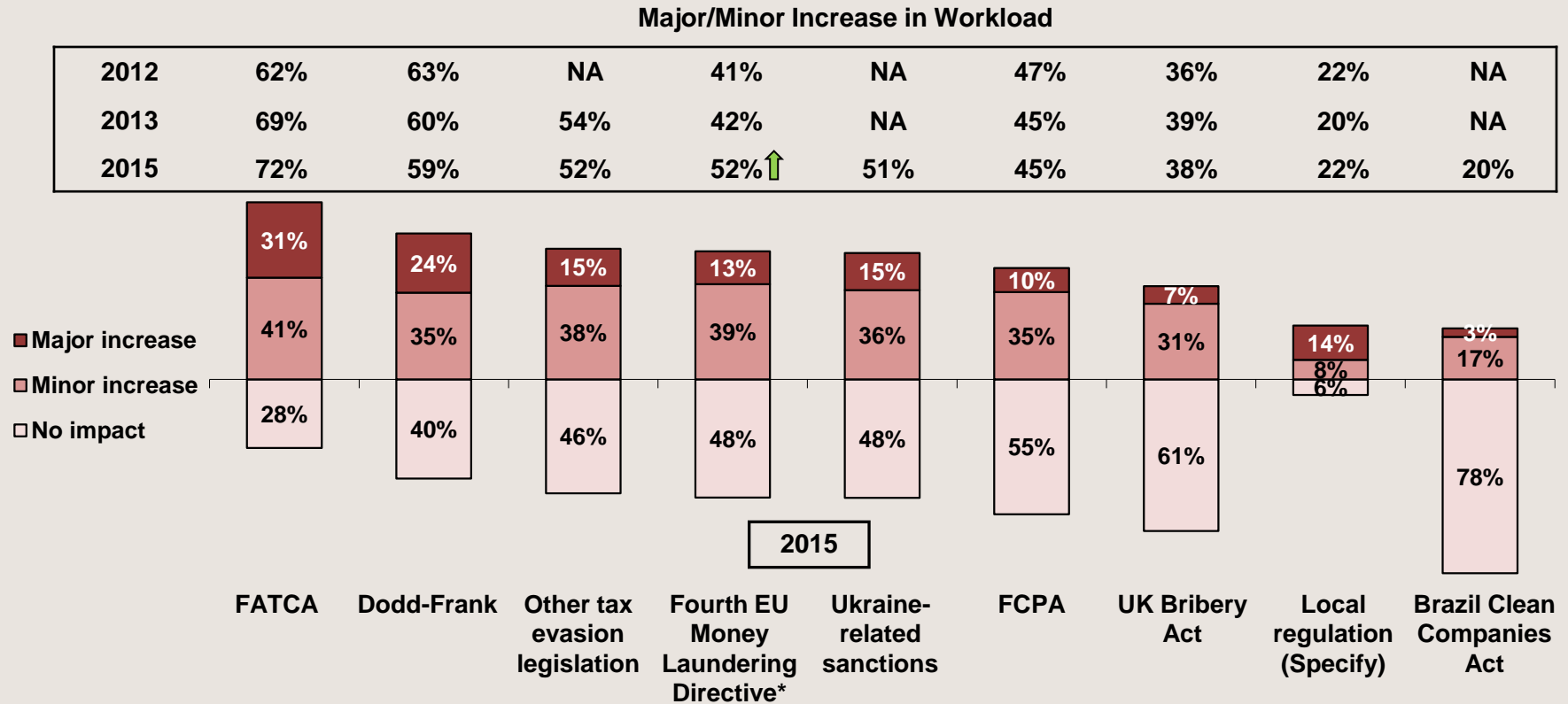| Challenge	2015	2013	2012
Increased regulatory expectations	58%	50%	52%
Having enough properly trained AML staff	40%	30%	27%
Additional regulations	37%	37%	39%
Increased enforcement of current regulations	31%	34%	32%
Insufficient/outdated technology	31%	25%	26%
Too many false positive screening results	22%	21%	20%
Understanding regs outside home country	16%	18%	18%
Formal regulatory criticism	13%	10%	8%
Lack of senior management engagement	12%	9%	9%
Avoiding sanctions enforcement actions	12%	8%	9%
Understanding regulations in home country	8%	9%	9%
A regulatory fine	6%	4%	5%

6. Which of these AML compliance challenges do you expect your organization to face in the next 12 months?
Base: Total: 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)

Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

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Impact of Regulations on Organization Workload

Increased workload continues to come mostly from FATCA and Dodd-Frank regulations as well as other tax evasion legislation. The impact of the Fourth EU Money Laundering Directive increases in 2015. More than half of respondents say Ukraine-related sanctions have also added to workloads.

Major/Minor Increase in Workload

Year	FATCA	Dodd-Frank	Other tax evasion legislation	Fourth EU Money Laundering Directive*	Ukraine-related sanctions	FCPA	UK Bribery Act	Local regulation (Specify)	Brazil Clean Companies Act
2012	62%	63%	NA	41%	NA	47%	36%	22%	NA
2013	69%	60%	54%	42%	NA	45%	39%	20%	NA
2015	72%	59%	52%	52% ⬆	51%	45%	38%	22%	20%

Legend:
- ■ Major increase
- □ Minor increase
- □ No impact

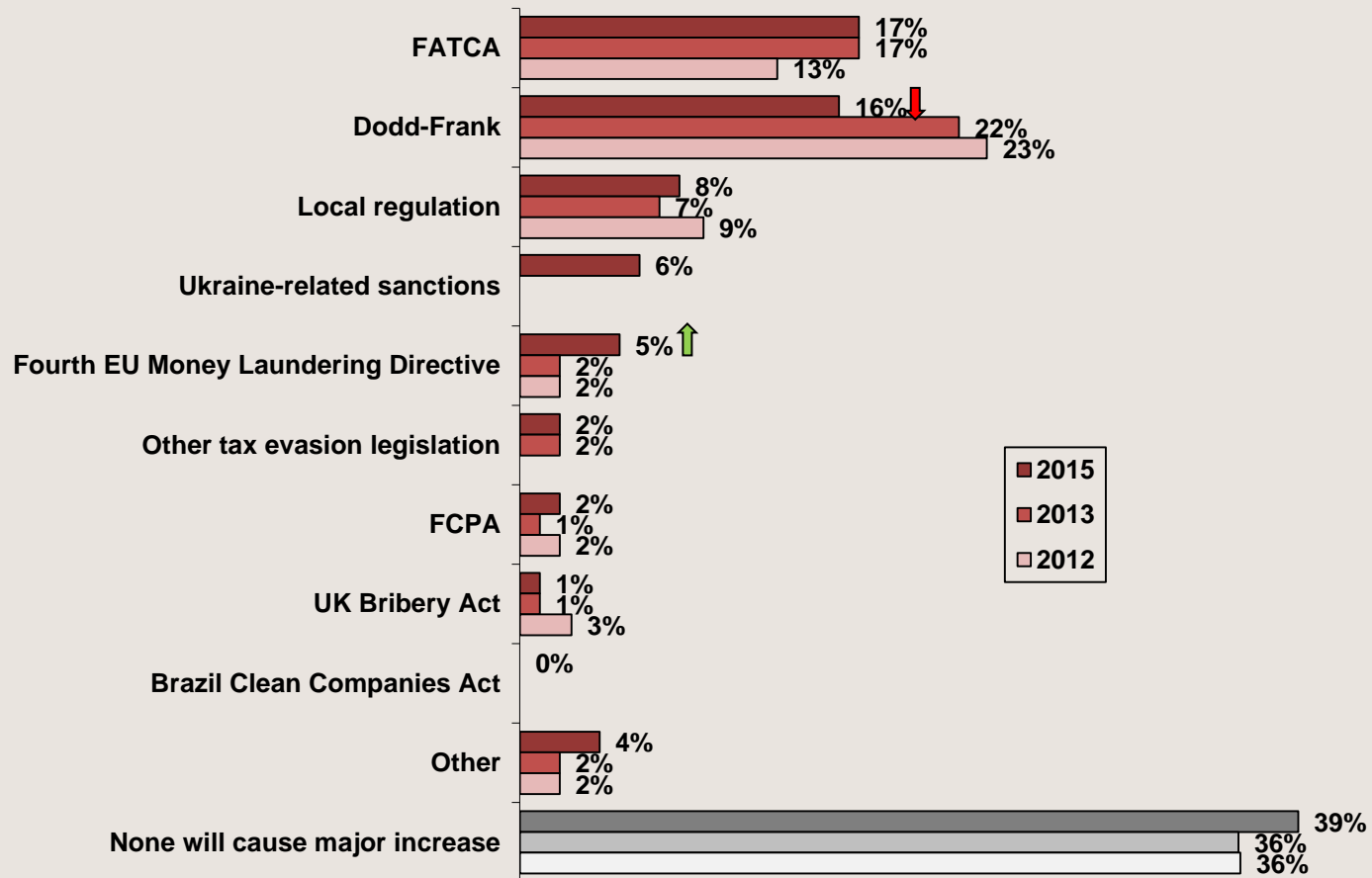|	FATCA	Dodd-Frank	Other tax evasion legislation	Fourth EU Money Laundering Directive*	Ukraine-related sanctions	FCPA	UK Bribery Act	Local regulation (Specify)	Brazil Clean Companies Act
Major increase	31%	24%	15%	13%	15%	10%	7%	14%	3%
Minor increase	41%	35%	38%	39%	36%	35%	31%	8%	17%
No impact	28%	40%	46%	48%	48%	55%	61%	6%	78%

2015

*Note: Changed from "Fourth EU Directive" in 2013 to "Fourth EU Money Laundering Directive" in 2015

7. What impact do you believe these recent/forthcoming regulations or recommendations have had (or will have) on the workload of your organization?
Base: Total: 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)

Green and **Red** arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

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Regulation With Most Impact on Organization Workload

FATCA and Dodd-Frank continue to be the regulations most responsible for increased workloads, although the impact of Dodd-Frank decreases from 2013 to 2015. For nearly 40% of respondents, none of these specific regulations represented a major impact on workloads.
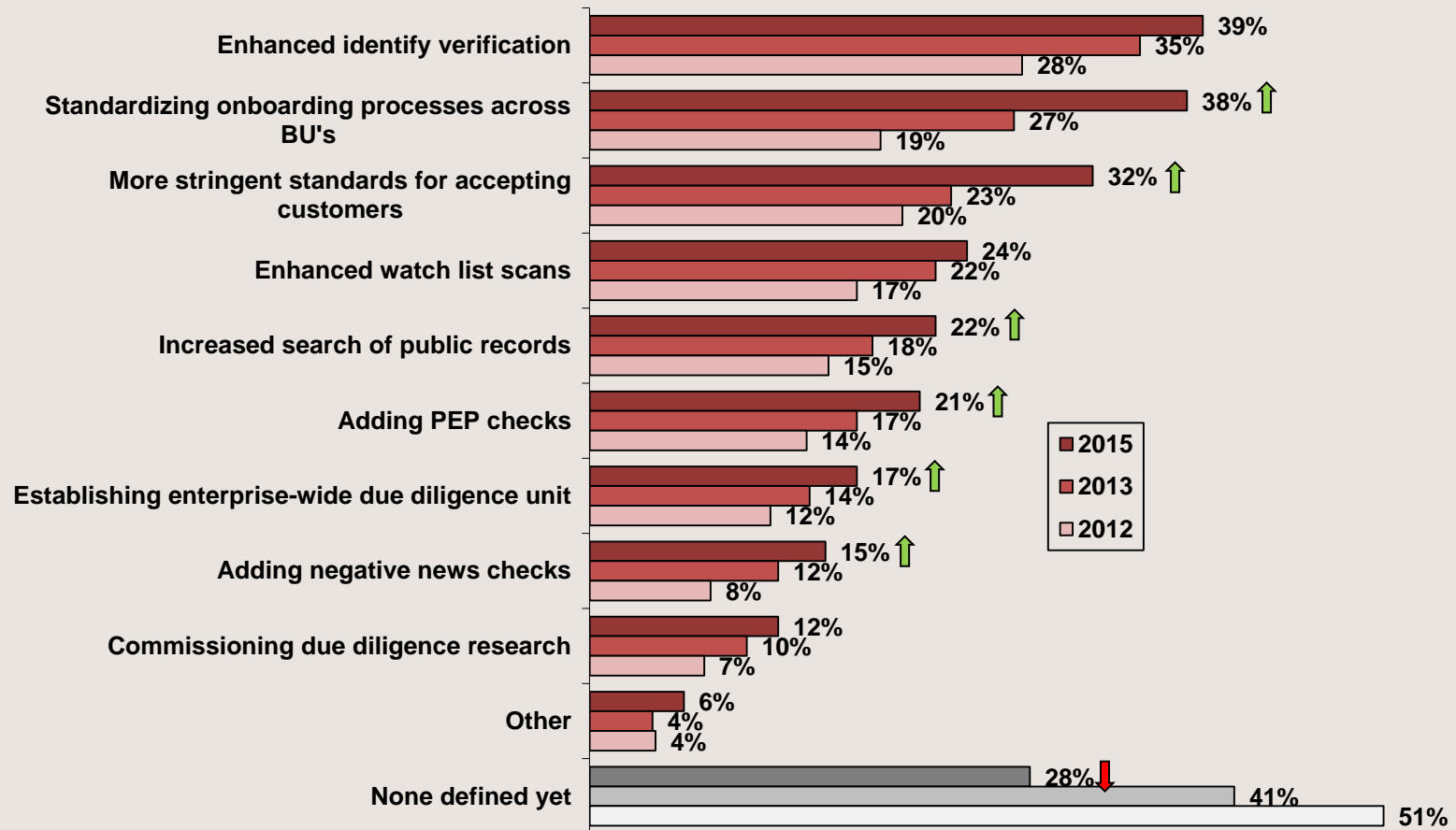

Legend:
- 2015
- 2013
- 2012

Regulation	2015	2013	2012
FATCA	17%	17%	13%
Dodd-Frank	16%	22%	23%
Local regulation	8%	7%	9%
Ukraine-related sanctions	6%		
Fourth EU Money Laundering Directive	5%	2%	2%
Other tax evasion legislation	2%	2%	
FCPA	2%	1%	2%
UK Bribery Act	1%	1%	3%
Brazil Clean Companies Act	0%		
Other	4%	2%	2%
None will cause major increase	39%	36%	36%

8. Which of these has resulted (or will result) in the greatest increase in your organization's workload?
Base: Total: 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)

Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

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Client-Onboarding Changes Due to FATCA Requirements

An increasing proportion of respondents (over 70%) report their organizations have already made or are considering changes to client-onboarding processes due to FATCA requirements. Enhanced identity verification remains the most-mentioned change, although standardized onboarding processes and more stringent customer-acceptance standards increase sharply from 2013 to 2015.

Change	2015	2013	2012
Enhanced identify verification	39%	35%	28%
Standardizing onboarding processes across BU's	38%	27%	19%
More stringent standards for accepting customers	32%	23%	20%
Enhanced watch list scans	24%	22%	17%
Increased search of public records	22%	18%	15%
Adding PEP checks	21%	17%	14%
Establishing enterprise-wide due diligence unit	17%	14%	12%
Adding negative news checks	15%	12%	8%
Commissioning due diligence research	12%	10%	7%
Other	6%	4%	4%
None defined yet	28%	41%	51%

11. What changes, if any, is your organization considering (or has already implemented) to the client-onboarding process due to FATCA requirements?
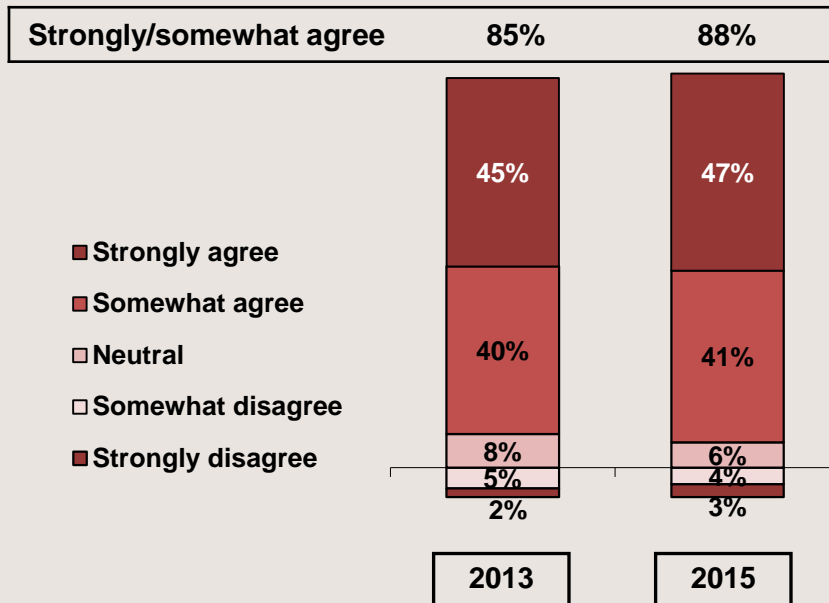Base: Total answering: 2012 (n=972); 2013 (n=757); 2015 (n=860)

Green and **Red** arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence
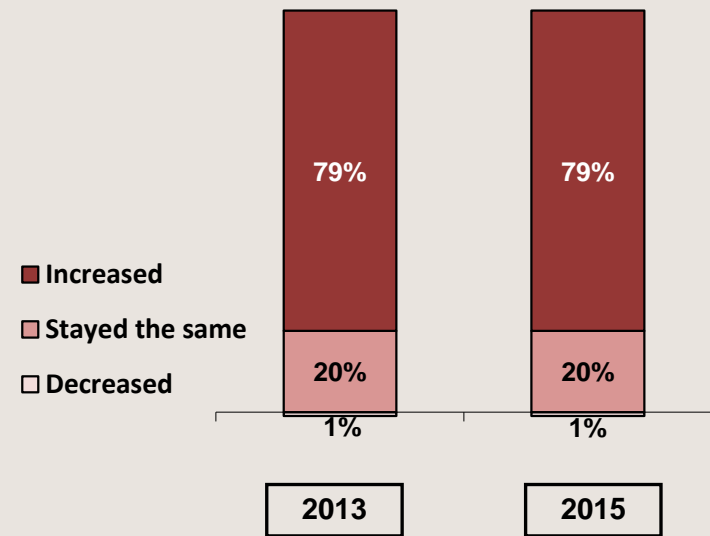
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Company Risk Policies and Operational Effectiveness

A strong majority of respondents continue to believe their companies' risk policies and/or operations reflect a convergence of global compliance disciplines (e.g., AML, sanctions, anti-bribery, tax, fraud). As in 2013, nearly 80% report increased regulatory expectations for operational effectiveness in the past 12 months.

Policies/Operations Reflect Convergence of Compliance Disciplines

| Strongly/somewhat agree | 85% | 88% |

Legend:
- Strongly agree
- Somewhat agree
- Neutral
- Somewhat disagree
- Strongly disagree

2013: Strongly agree 45%, Somewhat agree 40%, Neutral 8%, Somewhat disagree 5%, Strongly disagree 2%

2015: Strongly agree 47%, Somewhat agree 41%, Neutral 6%, Somewhat disagree 4%, Strongly disagree 3%

Change in Regulatory Expectations for Operational Effectiveness in Past 12 Months

Legend:
- Increased
- Stayed the same
- Decreased

2013: Increased 79%, Stayed the same 20%, Decreased 1%

2015: Increased 79%, Stayed the same 20%, Decreased 1%

11a. Agree or disagree: My company's risk policy and/or operations reflect the convergence of multiple disciplines in the global compliance environment.
Base: Total answering: 2013 (n=961); 2015 (n=1,074)
11b. In the past 12 months, have regulatory expectations for operational effectiveness increased, decreased or remained the same?
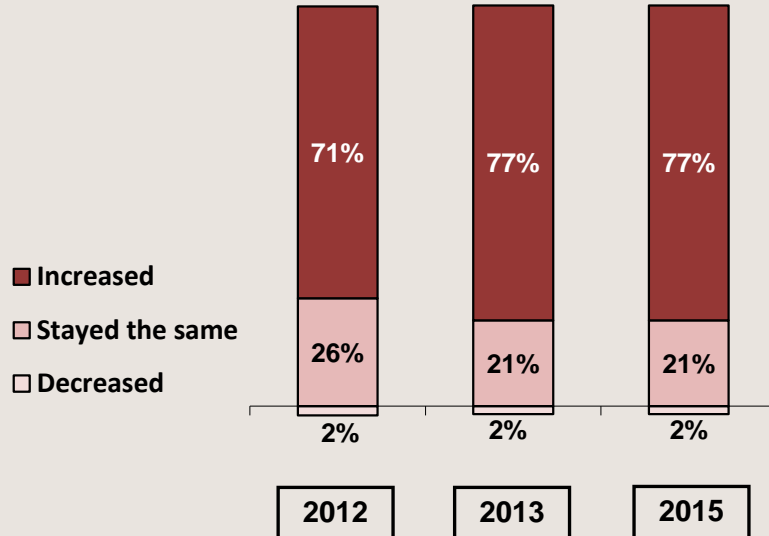Base: Total answering: 2013 (n=932); 2015 (n=1,075)

Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence
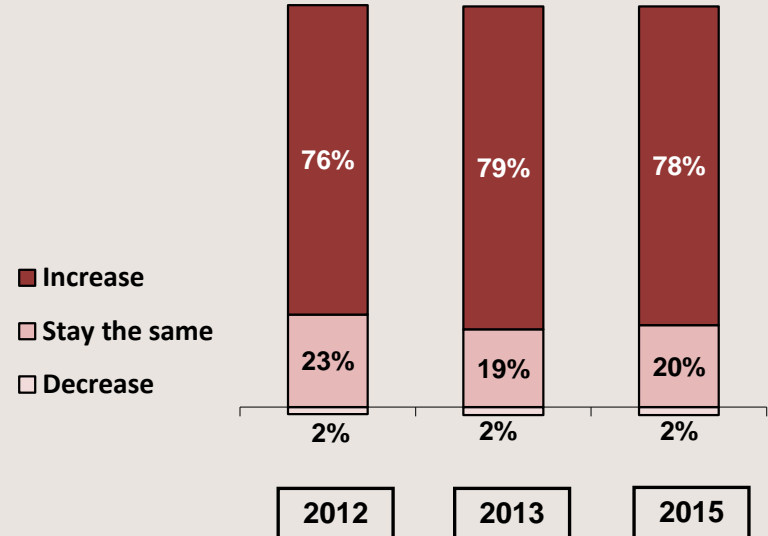
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Changes in Personal & Department Workload

As in previous years, three-quarters of AML professionals report increased personal workloads and comparable proportions predict further increases in department workloads in the coming year. Most others expect their workloads to remain at current levels.

Change in <u>Personal</u> Workload in <u>Past</u> 12 Months

- ■ Increased
- □ Stayed the same
- □ Decreased

71%	77%	77%
26%	21%	21%
2%	2%	2%
2012	**2013**	**2015**

Expected Change in <u>Department</u> Workload in <u>Next</u> 12 Months

- ■ Increase
- □ Stay the same
- □ Decrease

76%	79%	78%
23%	19%	20%
2%	2%	2%
2012	**2013**	**2015**

14. In the past 12 months, has your personal workload in relation to AML compliance increased, decreased or stayed the same?
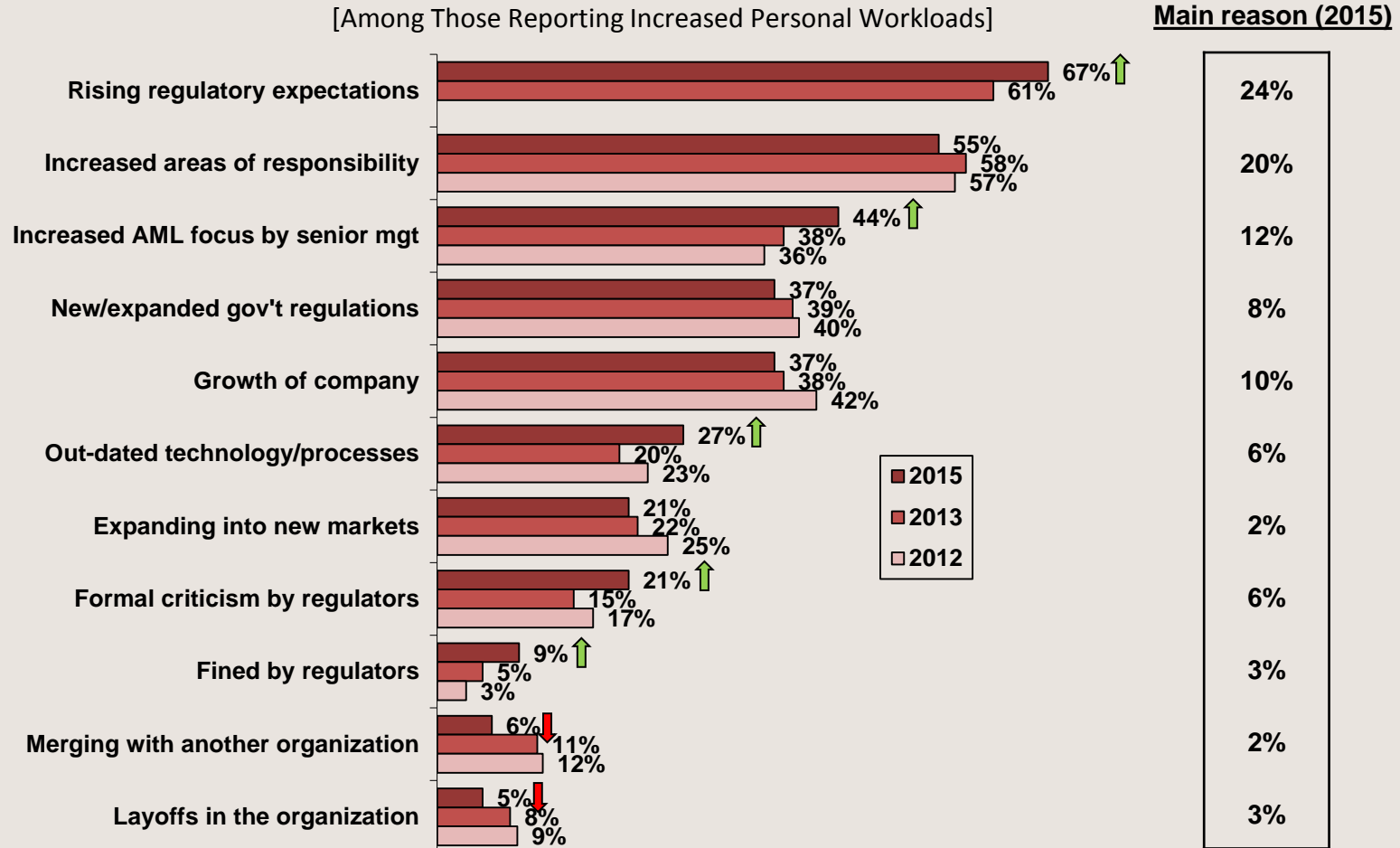17. Over the next 12 months, do you expect your department's workload, in relation to AML compliance, to increase, decrease or stay the same?
Base: Total: 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

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Reasons for Increase in Personal Workload

Rising regulatory expectations and increased areas of responsibility remained the strongest drivers of greater personal workloads. Increased senior management focus on AML, outdated technology, formal regulator criticism and regulator fines – along with regulatory expectations – became more widely reported reasons for increased workloads.

[Among Those Reporting Increased Personal Workloads]

Main reason (2015)

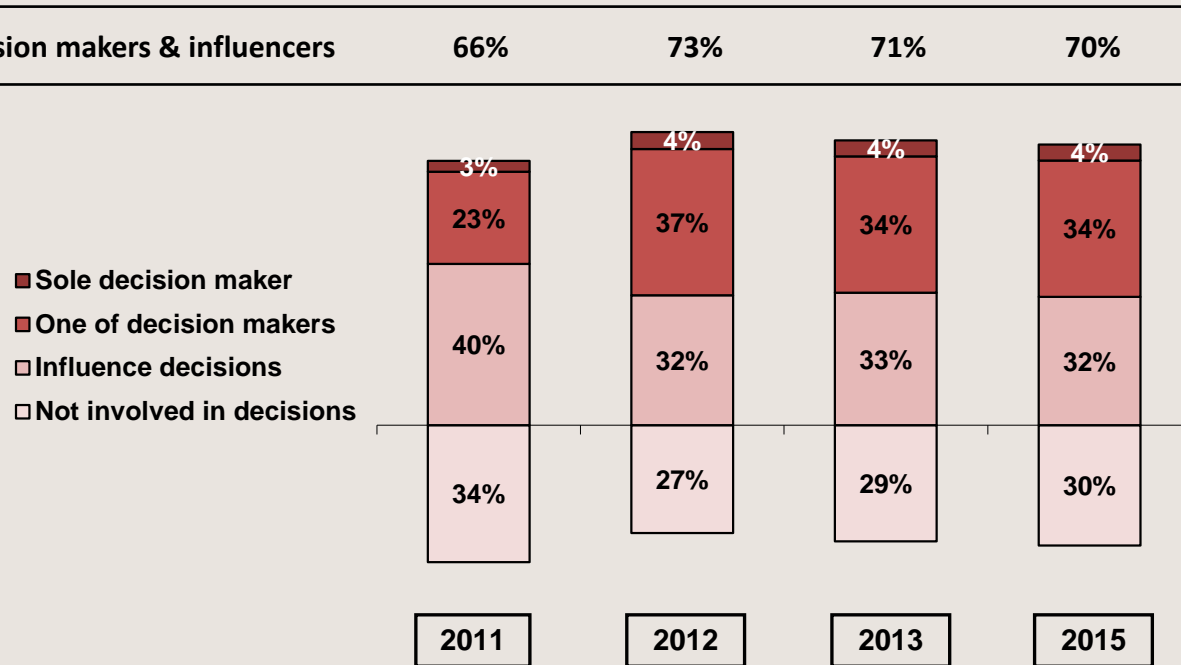| Reason	2015	2013	2012	Main reason (2015)
Rising regulatory expectations	67% ↑	61%		24%
Increased areas of responsibility	55%	58%	57%	20%
Increased AML focus by senior mgt	44% ↑	38%	36%	12%
New/expanded gov't regulations	37%	39%	40%	8%
Growth of company	37%	38%	42%	10%
Out-dated technology/processes	27% ↑	20%	23%	6%
Expanding into new markets	21%	22%	25%	2%
Formal criticism by regulators	21% ↑	15%	17%	6%
Fined by regulators	9% ↑	5%	3%	3%
Merging with another organization	6% ↓	11%	12%	2%
Layoffs in the organization	5% ↓	8%	9%	3%

Legend: ■ 2015 ■ 2013 □ 2012

15. Which of the following are reasons your workload increased? 16. And, which of these is the main reason why your workload increased?
Base: Workload increased: 2012 (n=909); 2013 (n=764); 2015 (n=862)

Green and **Red** arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

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AML Data Providers

AML Data Provider Decision-Making Role

70% of 2015 respondents are involved in decisions regarding AML data providers. This proportion is similar to levels in previous years.
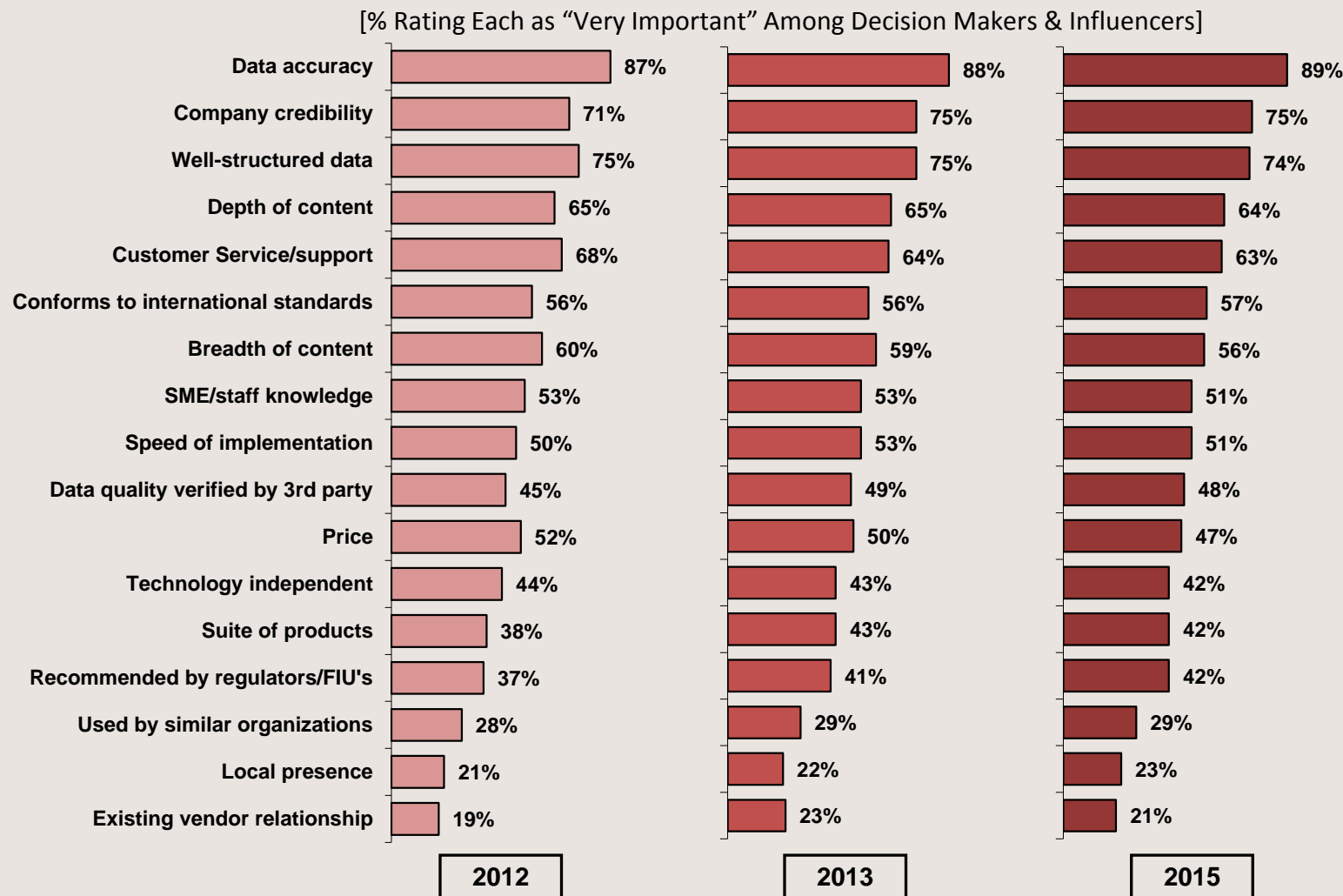
| Decision makers & influencers | 66% | 73% | 71% | 70% |

Legend:
- ■ Sole decision maker
- ■ One of decision makers
- □ Influence decisions
- □ Not involved in decisions

2011
- Sole decision maker: 3%
- One of decision makers: 23%
- Influence decisions: 40%
- Not involved in decisions: 34%

2012
- Sole decision maker: 4%
- One of decision makers: 37%
- Influence decisions: 32%
- Not involved in decisions: 27%

2013
- Sole decision maker: 4%
- One of decision makers: 34%
- Influence decisions: 33%
- Not involved in decisions: 29%

2015
- Sole decision maker: 4%
- One of decision makers: 34%
- Influence decisions: 32%
- Not involved in decisions: 30%

3. Which of the following best describes your role in the selection and approval of AML data providers used in your department or organization?
Base: Total: 2011 (n=562); 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

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Key Factors In Choosing AML Data Provider

Decision-makers continue to cite data accuracy as the single "most important" factor in choosing AML data providers. Vendor credibility, data structure, vendor credibility, depth of content and customer service remain "very important" for 60% or more of decision makers.
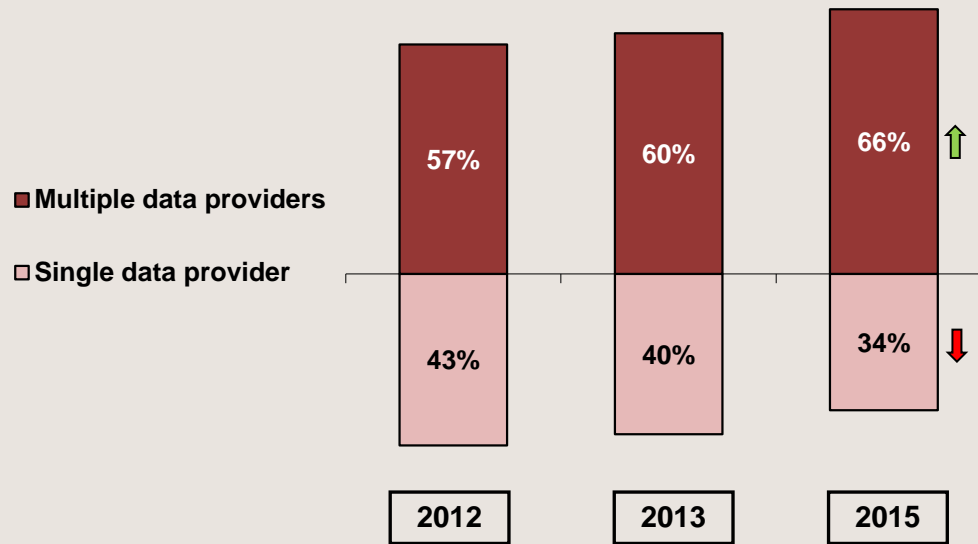
[% Rating Each as "Very Important" Among Decision Makers & Influencers]

Factor	2012	2013	2015
Data accuracy	87%	88%	89%
Company credibility	71%	75%	75%
Well-structured data	75%	75%	74%
Depth of content	65%	65%	64%
Customer Service/support	68%	64%	63%
Conforms to international standards	56%	56%	57%
Breadth of content	60%	59%	56%
SME/staff knowledge	53%	53%	51%
Speed of implementation	50%	53%	51%
Data quality verified by 3rd party	45%	49%	48%
Price	52%	50%	47%
Technology independent	44%	43%	42%
Suite of products	38%	43%	42%
Recommended by regulators/FIU's	37%	41%	42%
Used by similar organizations	28%	29%	29%
Local presence	21%	22%	23%
Existing vendor relationship	19%	23%	21%

18. When choosing an AML data provider for your organization, how important is each factor?
Base: Decision Makers & Influencers: 2012 (n=932); 2013 (n=702); 2015 (n=780)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

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Number of AML Data Providers Used

An increasing proportion of respondents – more than 65% – report their organizations are using multiple AML data providers.

■ **Multiple data providers**

□ **Single data provider**

	2012	2013	2015
Multiple data providers	57%	60%	66% ⬆
Single data provider	43%	40%	34% ⬇

21. Do you use more than one sanctions, PEP and adverse media data provider for AML compliance?
Base: Total answering: 2012 (n=1,065); 2013 (n=777); 2015 (n=871)

Green and **Red** arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

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Using & Consolidating Multiple AML Data Providers

Comprehensiveness remains the most-mentioned reason for using multiple providers, followed by coverage of specialized risk categories. More respondents claim their companies are using multiple data providers to satisfy company regional requirements in 2015. Nearly 45% of respondents in companies using multiple providers report their companies are considering consolidating to a single provider.

Reasons for using multiple data providers
[Among Those Using Multiple Data Providers]

Reason	2015	2013	2012
Comprehensiveness	55%	51%	42%
Specialized risk categories	40%	36%	42%
Result of legacy systems/contracts	27%	25%	32%
Decentralized AML structure regional requirements	23% ⬆	16%	18%
Risk of data provider outage	13%	12%	8%
Result of company acquisitions	12%	10%	16%
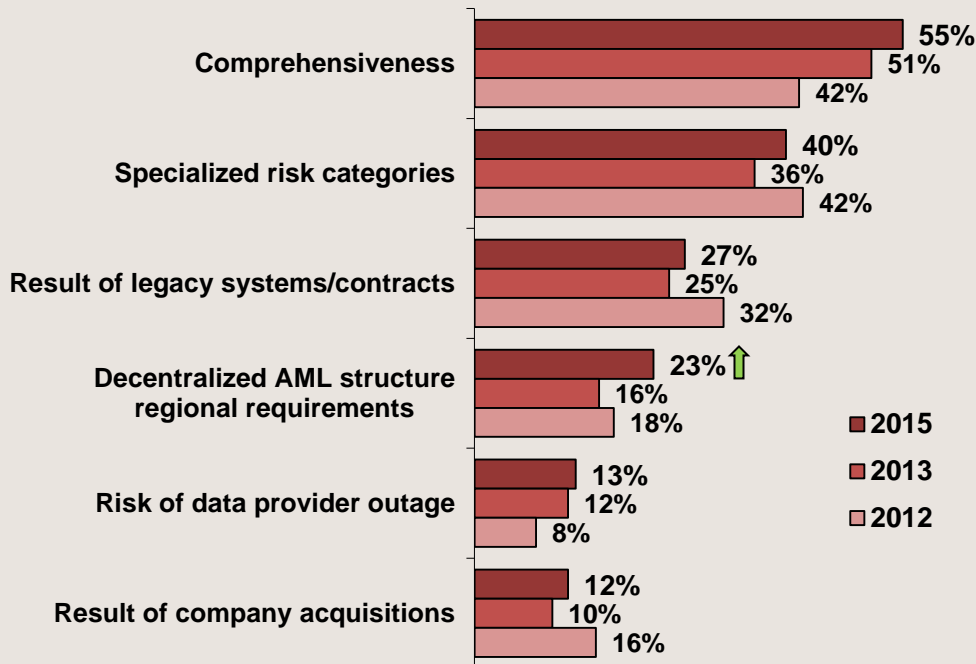
Considering consolidating data providers
[Among Decision Makers Using Multiple Data Providers]

2012	2013	2015
40%	42%	44%
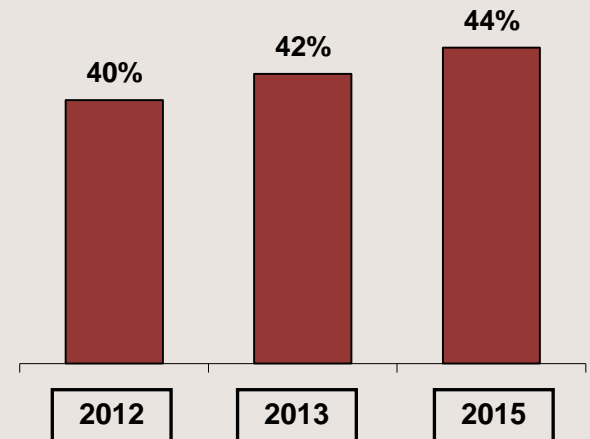
22. What are the reasons for using more than one data provider? Base: Use multiple data providers: 2012 (n=609); 2013 (n=467); 2015 (n=579)
23. Are you considering consolidating data providers?
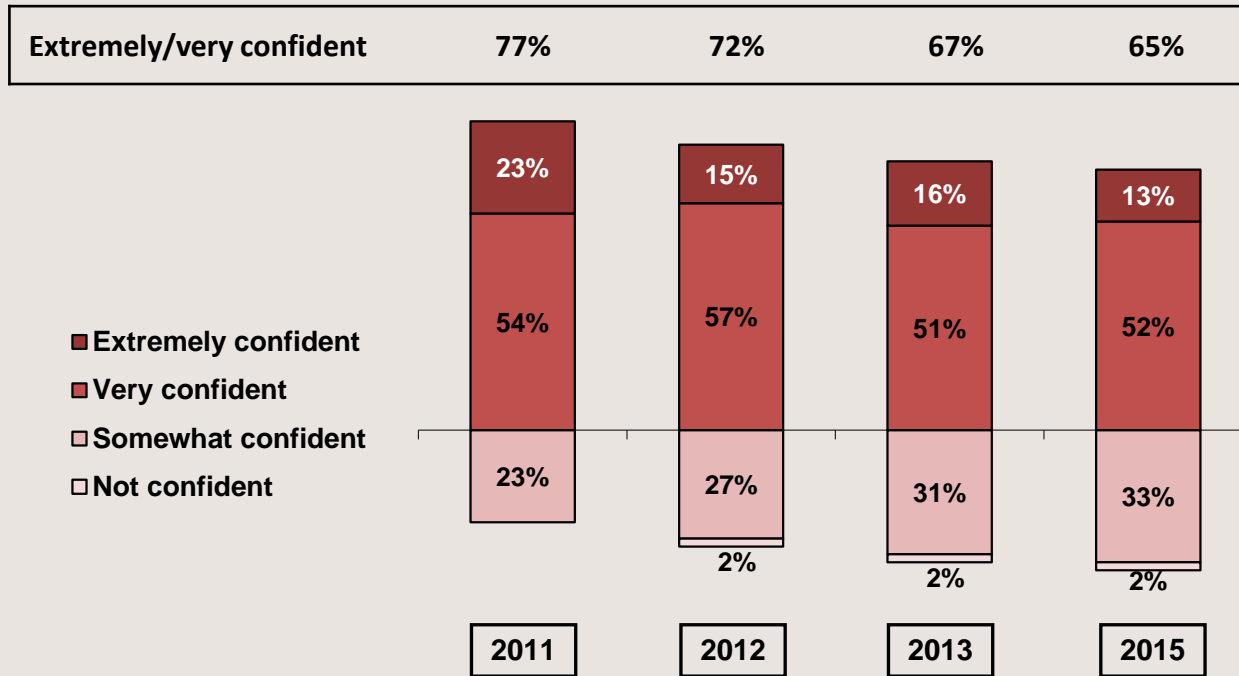Base: Decision makers/influencers w/multiple providers who answered question: 2012 (n=302); 2013 (n=247); 2015 (n=301)
Green and **Red** arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

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Client Screening

Familiarity with Client-Screening Process in Organization

The vast majority of respondents are at least somewhat familiar with the client-screening processes in their organizations, including more than half who are "very familiar."

Familiar with Client-Screening process	87%	87%	87%

■ **Very familiar**
□ **Somewhat familiar**
□ **Not familiar**

	2012	2013	2015
Very familiar	54%	53%	51%
Somewhat familiar	33%	34%	36%
Not familiar	13%	13%	13%
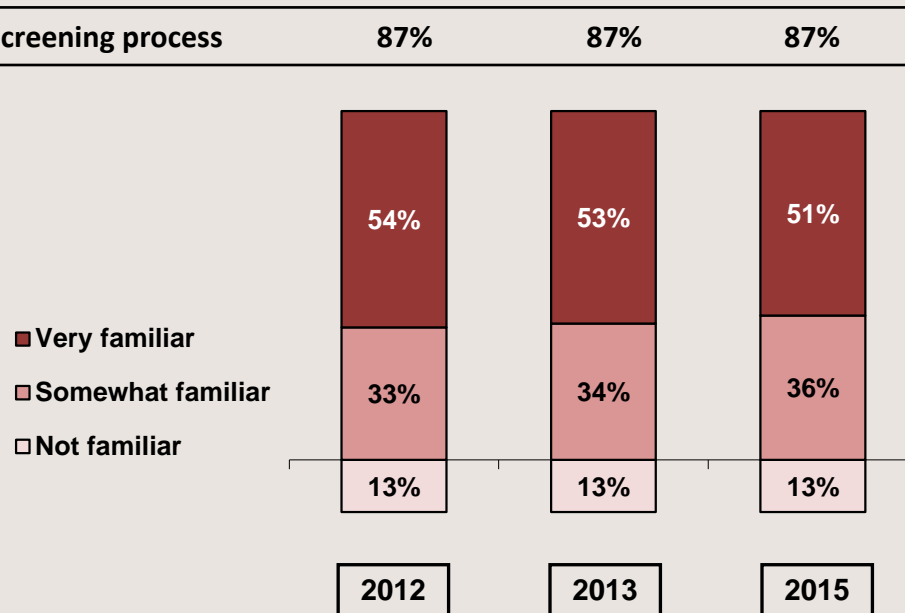
24. How familiar are you with the client-screening process in your organization?
Base: Total: 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)

Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

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Confidence in Client-Screening Provider Data Accuracy

About two-thirds of respondents who are mainly focused on client screening are "extremely" or "very confident" in the data accuracy of their primary data provider. Confidence levels have decreased over the past few years but not significantly in any single year.

[Among Those With Client Screening as a Main Function]

Extremely/very confident	77%	72%	67%	65%

Legend:
- ■ Extremely confident
- ■ Very confident
- ☐ Somewhat confident
- ☐ Not confident

Bar data:
- **2011**: 23% (Extremely), 54% (Very), 23% (Somewhat)
- **2012**: 15% (Extremely), 57% (Very), 27% (Somewhat), 2% (Not)
- **2013**: 16% (Extremely), 51% (Very), 31% (Somewhat), 2% (Not)
- **2015**: 13% (Extremely), 52% (Very), 33% (Somewhat), 2% (Not)

25. When thinking of your organization's primary data provider for client screening, how confident are you that the data is accurate?
Base: Client Screening is main function: 2011 (n=95); 2012 (n=295); 2013 (n=248); 2015 (n=286)

Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

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Why not Fully Confident in Client-Screening Data Accuracy

Excessive false-positive alerts and issues regarding name variations are even more important in 2015 as key factors hurting confidence in client-screening data providers. Concerns about data structure and integration also increased in importance.

[Among Those Familiar with Client Screening and Not "Extremely" or "Very" Confident in Data Accuracy]

Category	2015	2013	2012
Too many false-positive alerts	44%	37%	40%
Name variations / transliterations	41%	32%	33%
Comprehensiveness of the data	32%	34%	28%
Gaps in coverage / in certain regions	27%	25%	23%
Insufficient breadth of coverage	24%	23%	18%
Data structure	24%	17%	27%
Too many false-negative alerts	23%	19%	19%
Integration	18%	12%	17%
Timeliness	17%	14%	15%
Lack of data coverage definition	13%	16%	16%
Not enough crime types covered	13%	9%	9%
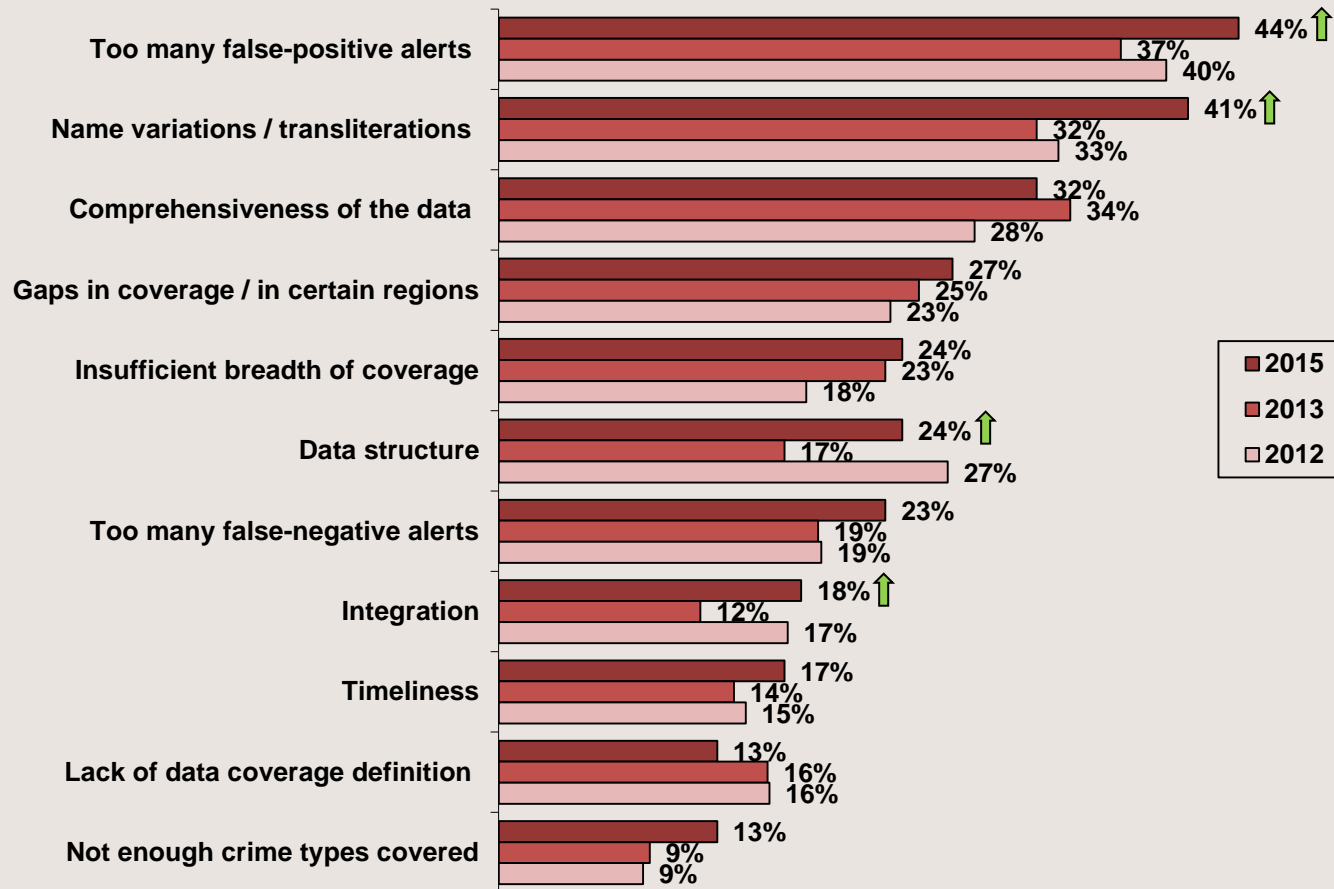
26. What are the reasons why you are not fully confident in your primary data provider for client screening?
Base: Familiar with Client Screening and not "extremely" or "very" confident in data accuracy of CS provider: 2012 (n=360); 2013 (n=312); 2015 (n=368)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

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Testing Client-Screening Data Quality

Nearly 90% of respondents report that their companies test the quality of data from their client-screening data providers, including almost half who conduct quality checks monthly or more often.
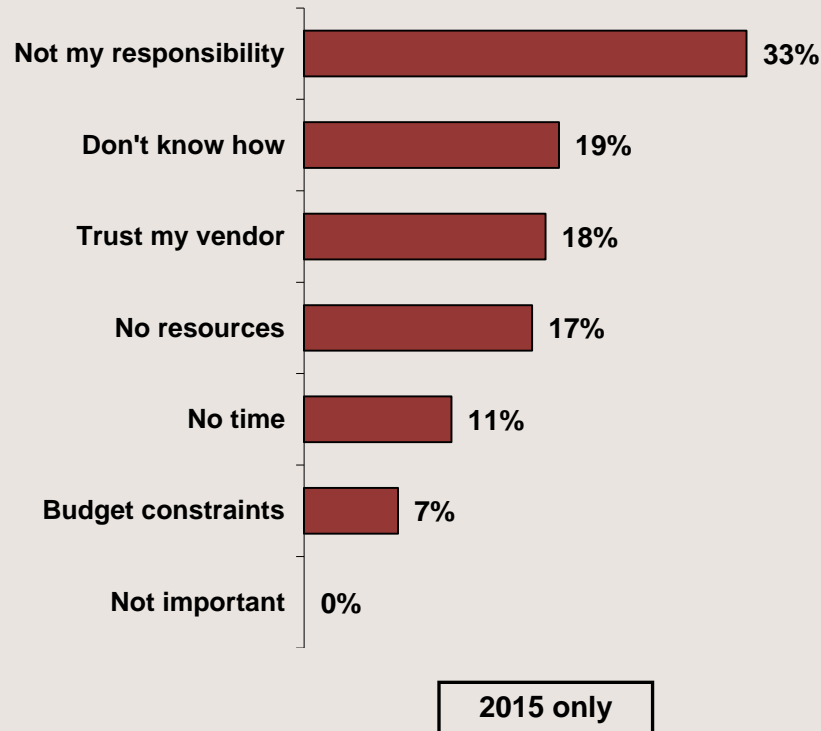
[Among Those Familiar With Client Screening]

Category	Value
Daily	19%
Weekly	11%
Monthly	16%
Quarterly	12%
Annually	14%
Every few years	2%
Only when issue suspected	16%
Have never run quality checks	11%

Test monthly or more often: 46%

2015 only
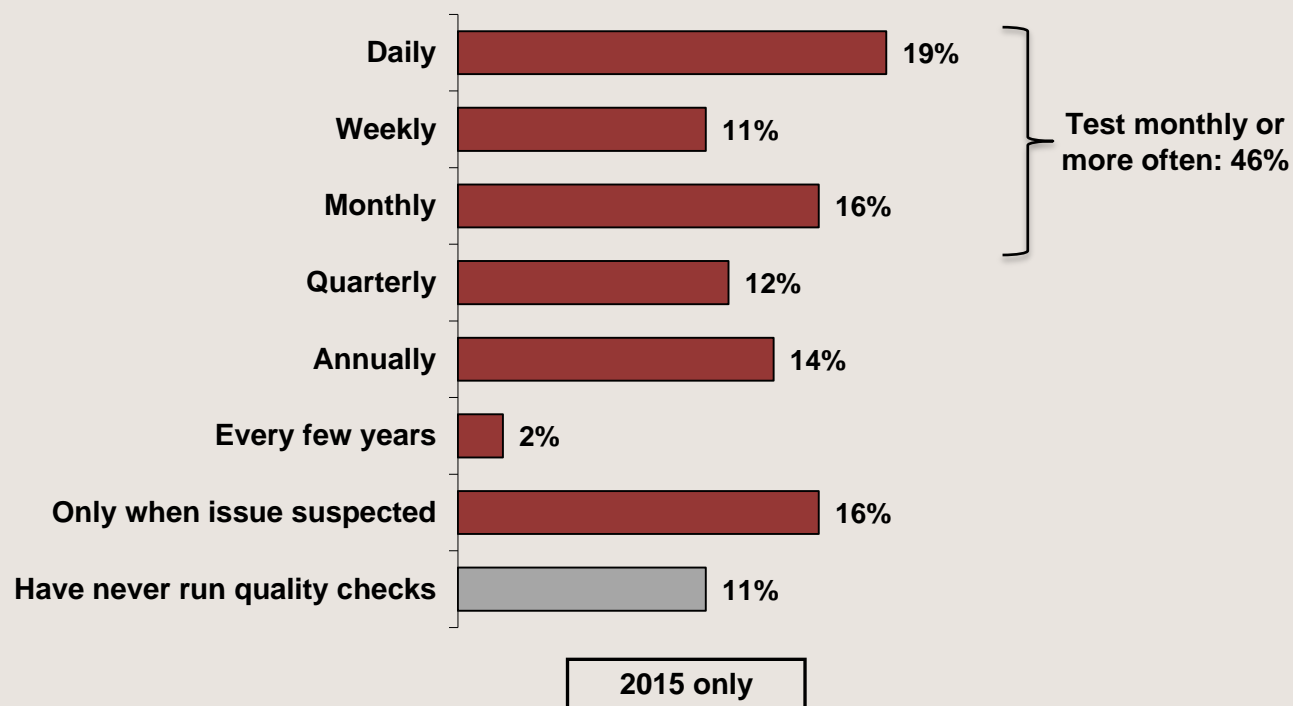
28. How often do you run quality checks on the data provided by your primary client-screening vendor?
Base: Familiar with Client Screening & answered: 2015 (n=631)

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Reasons For Not Reviewing Client-Screening Data Quality

One-third of respondents in companies that don't review client-screening data quality claim it is simply not their responsibility. Not knowing how to test data, trusting vendors and lack of resources are other important reasons why data quality is not tested.

[Among Those Familiar with Client Screening Who Have Never Screened for Data Quality]

Reason	Percentage
Not my responsibility	33%
Don't know how	19%
Trust my vendor	18%
No resources	17%
No time	11%
Budget constraints	7%
Not important	0%

2015 only

29. Why have you not reviewed the data quality from your primary client-screening vendor?
Base: Familiar with Client Screening & Have Never Screened for Data Quality: 2015 (n=72)

Screening for Domestic PEPs

About three-quarters of respondents work in organizations that screen for domestic PEPs in the client-screening process. The proportion for 2015 is within the range seen in previous years.

[Among Those With Client Screening as a Main Function]

■ Screen for domestic PEPs

□ Do not screen

2011	2012	2013	2015
78%	72%	82%	76%
22%	28%	18%	24%
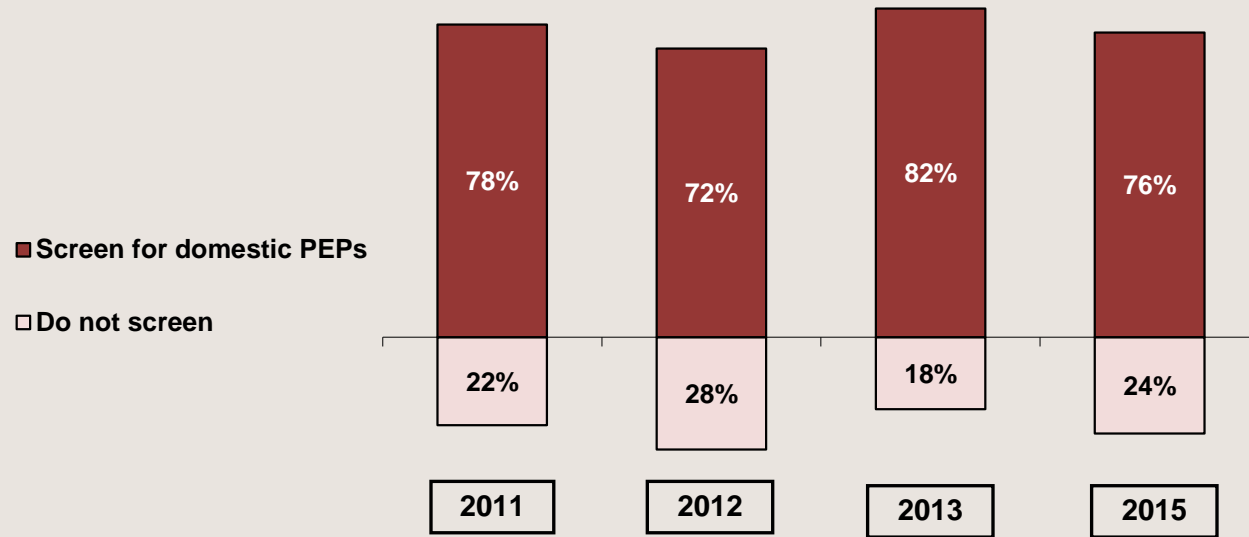
10. In your organization's current client screening process, do you screen for domestic PEPs?
Base: Client Screening is main function and answered question: 2011 (n=144); 2012 (n=293); 2013 (n=251); 2015 (n=286)

Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

Screening for Local-Level PEPs

Nearly 90% of respondents in organizations that screen for domestic PEPs report that their companies also screen for local-level PEPs. Local PEPs are usually included in client screening in all countries, not only those with regulatory requirements.

[Among Organizations Screening for Domestic PEPs]

Screening for Local-Level PEPs

■ Screen for local-level PEPs

□ Do not screen

2013	2015
89%	89%
11%	11%
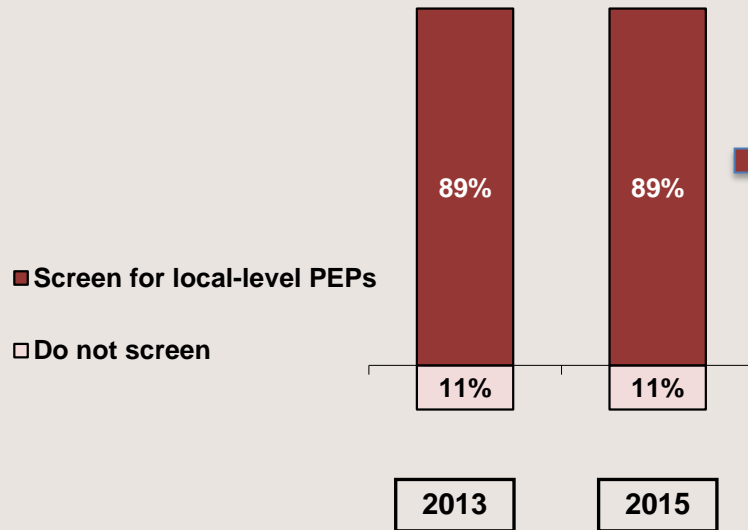
Where Local PEPs Included in Client Screening

■ All countries

■ Only countries with regulatory requirements

□ Other

2013	2015
77%	78%
19%	19%
4%	3%
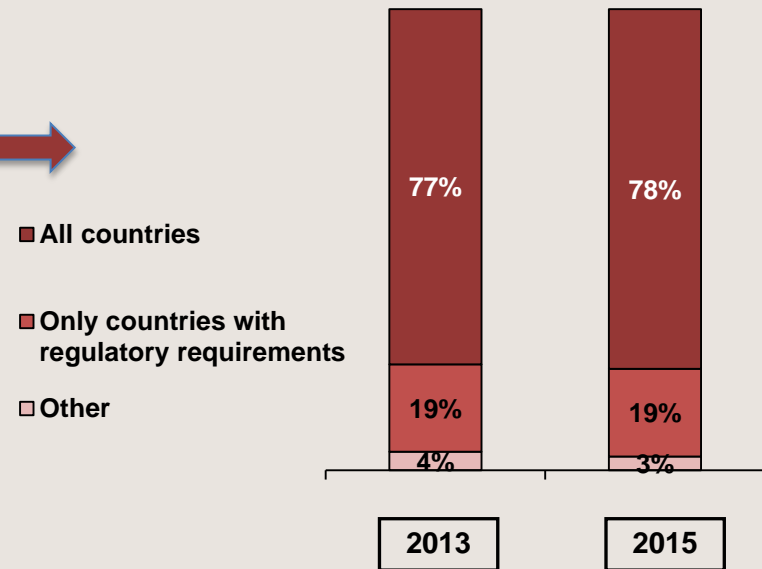
23a. Does your organization's client-screening process for PEP's include screening for "local" level PEPs?
Base: Screen for domestic PEPs and answered question: 2013 (n=598); 2015 (n=652)
23b. Are local level PEPs included in client screening in all countries or only those with specific regulatory requirements for local PEPs?
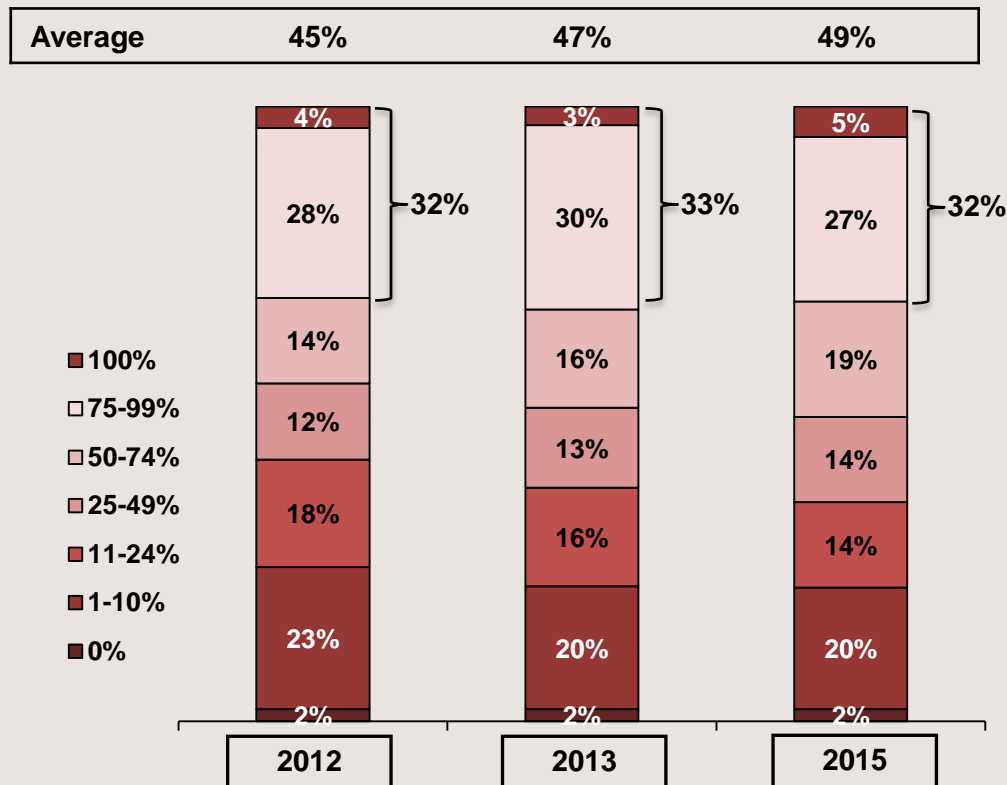Base: Screen for local PEPs: 2013 (n=533); 2015 (n=579)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

False Positive Alerts in Client Screening

As seen in previous years, nearly half of the alerts generated in client screening are false positives. One-third of respondents report 75% or more of their alerts are false positives.

[Among Those Familiar with Client Screening]

Average	45%	47%	49%

Legend:
- ■ 100%
- □ 75-99%
- □ 50-74%
- □ 25-49%
- ■ 11-24%
- ■ 1-10%
- ■ 0%

2012
- 4%
- 28% — 32%
- 14%
- 12%
- 18%
- 23%
- 2%

2013
- 3%
- 30% — 33%
- 16%
- 13%
- 16%
- 20%
- 2%

2015
- 5%
- 27% — 32%
- 19%
- 14%
- 14%
- 20%
- 2%

30. In your client screening, approximately what percentage of alerts are false positives?
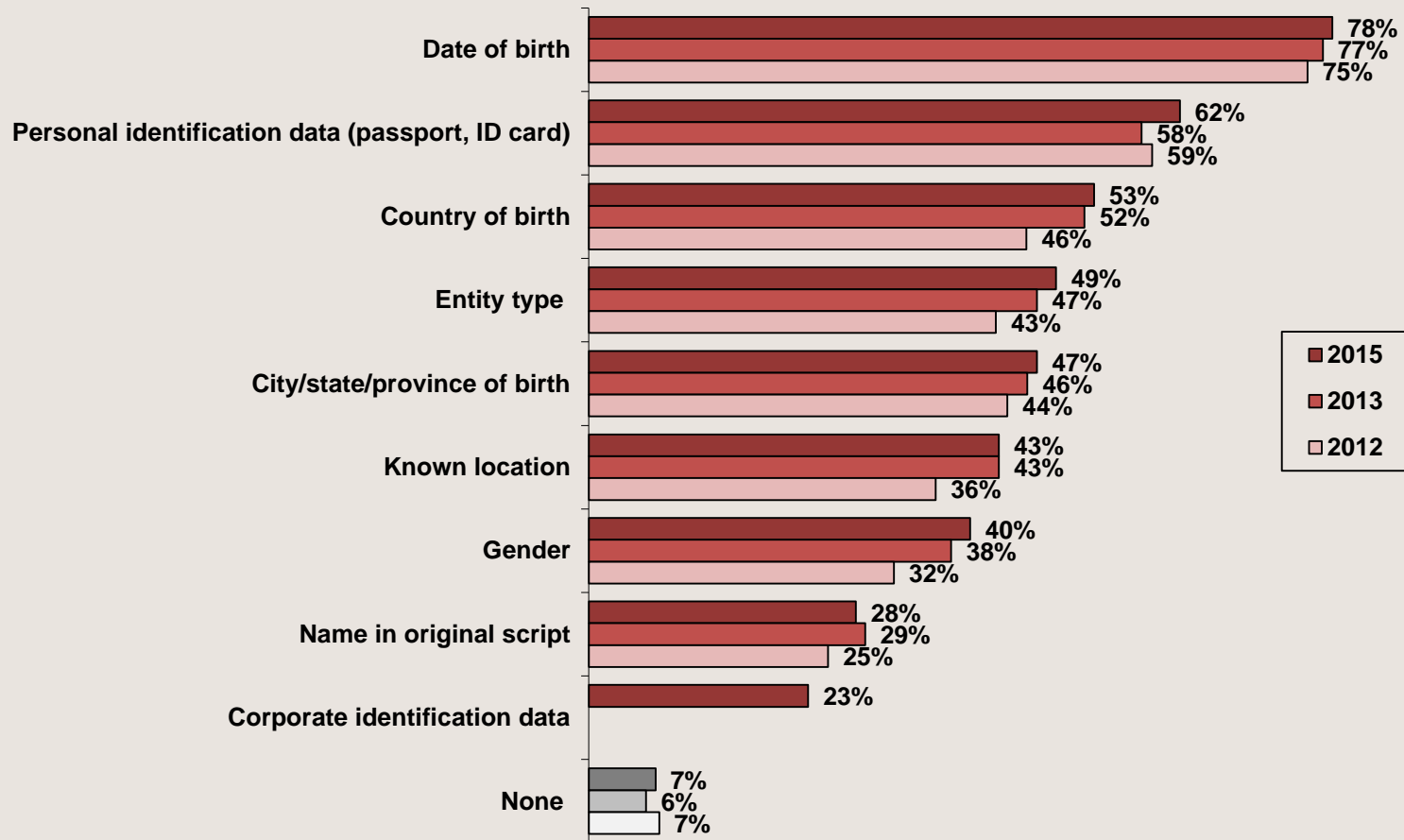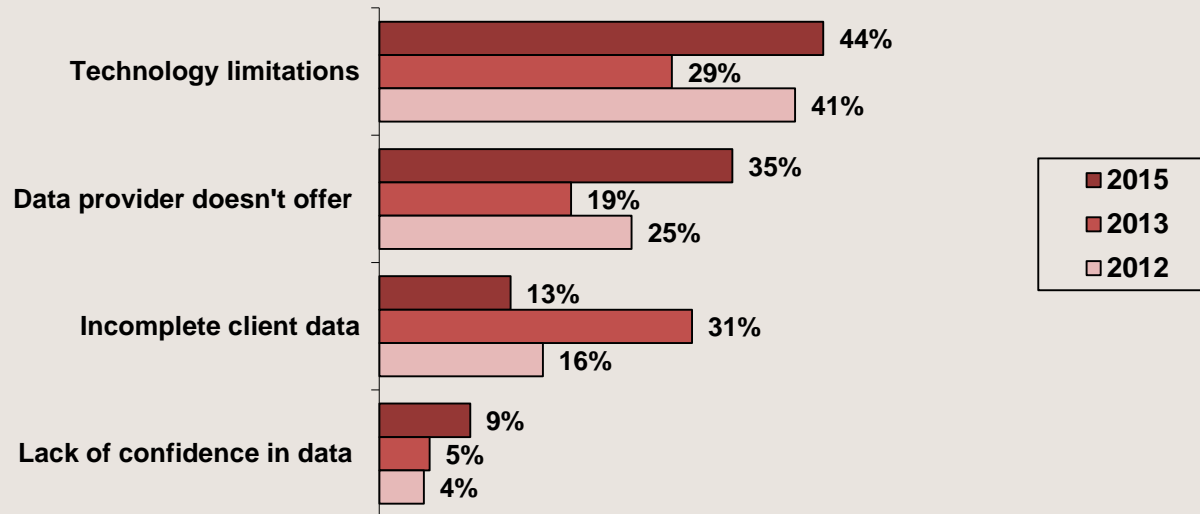Base: Familiar with Client Screening & answered question: 2012 (n=782); 2013 (n=601); 2015 (n=637)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

Average Time to Clear Generated Alert

As in previous years, nearly half of respondents claim their companies typically clear a generated alert within 5 minutes or less. The average across all respondents remains at 13 minutes.

[Among Those Familiar with Client Screening]

Average	12 min.	13 min.	13 min.

Legend:
- ☐ Other
- ☐ 31-60 minutes
- ☐ 16-30 minutes
- ■ 6-15 minutes
- ■ 3-5 minutes
- ■ <2 minutes

2012
- Other: 5%
- 31-60 minutes: 11%
- 16-30 minutes: 12%
- 6-15 minutes: 24%
- 3-5 minutes: 27%
- <2 minutes: 21%
- 48%

2013
- Other: 6%
- 31-60 minutes: 13%
- 16-30 minutes: 12%
- 6-15 minutes: 22%
- 3-5 minutes: 26%
- <2 minutes: 21%
- 47%

2015
- Other: 5%
- 31-60 minutes: 12%
- 16-30 minutes: 13%
- 6-15 minutes: 23%
- 3-5 minutes: 27%
- <2 minutes: 20%
- 47%

"Other" mentions (2015):
- ➤ *Varies/depends*
- ➤ *Longer than 1 hour*
- ➤ *Several days*

31. On average, how long does it take to clear a generated alert?
Base: Familiar with Client Screening & answered question: 2012 (n=853); 2013 (n=664); 2015 (n=707)
Green and **Red** arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

Secondary Identifiers Used in Client Screening

More than 90% of respondents report their organizations use secondary identifiers in the client-screening process. Date of birth, personal identification data and country of birth continue to be the most widely used secondary identifiers.

[Among Those Familiar with Client Screening]

Date of birth
- 2015: 78%
- 2013: 77%
- 2012: 75%

Personal identification data (passport, ID card)
- 2015: 62%
- 2013: 58%
- 2012: 59%

Country of birth
- 2015: 53%
- 2013: 52%
- 2012: 46%

Entity type
- 2015: 49%
- 2013: 47%
- 2012: 43%

City/state/province of birth
- 2015: 47%
- 2013: 46%
- 2012: 44%

Known location
- 2015: 43%
- 2013: 43%
- 2012: 36%

Gender
- 2015: 40%
- 2013: 38%
- 2012: 32%

Name in original script
- 2015: 28%
- 2013: 29%
- 2012: 25%

Corporate identification data
- 2015: 23%

None
- 2015: 7%
- 2013: 6%
- 2012: 7%

Legend: ■ 2015 ■ 2013 □ 2012

32. Aside from name in Latin script, what other secondary identifiers, if any, do you use for automated client screening?
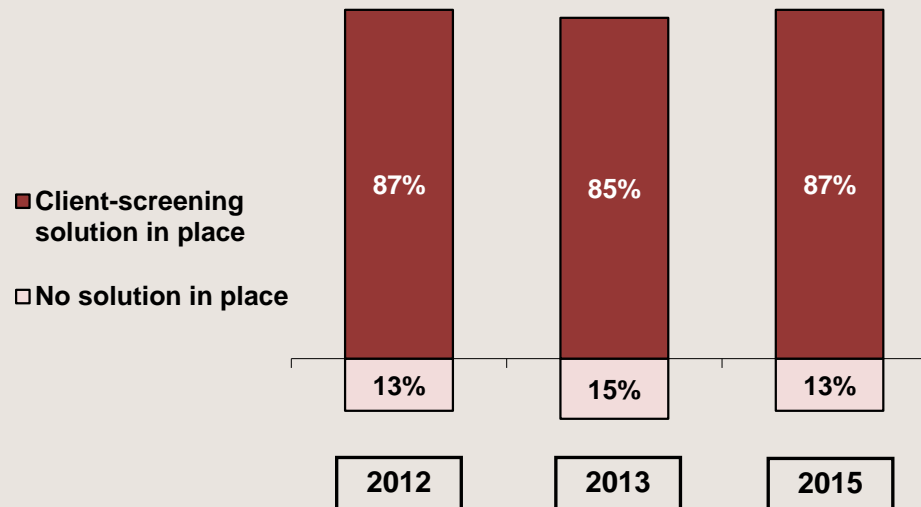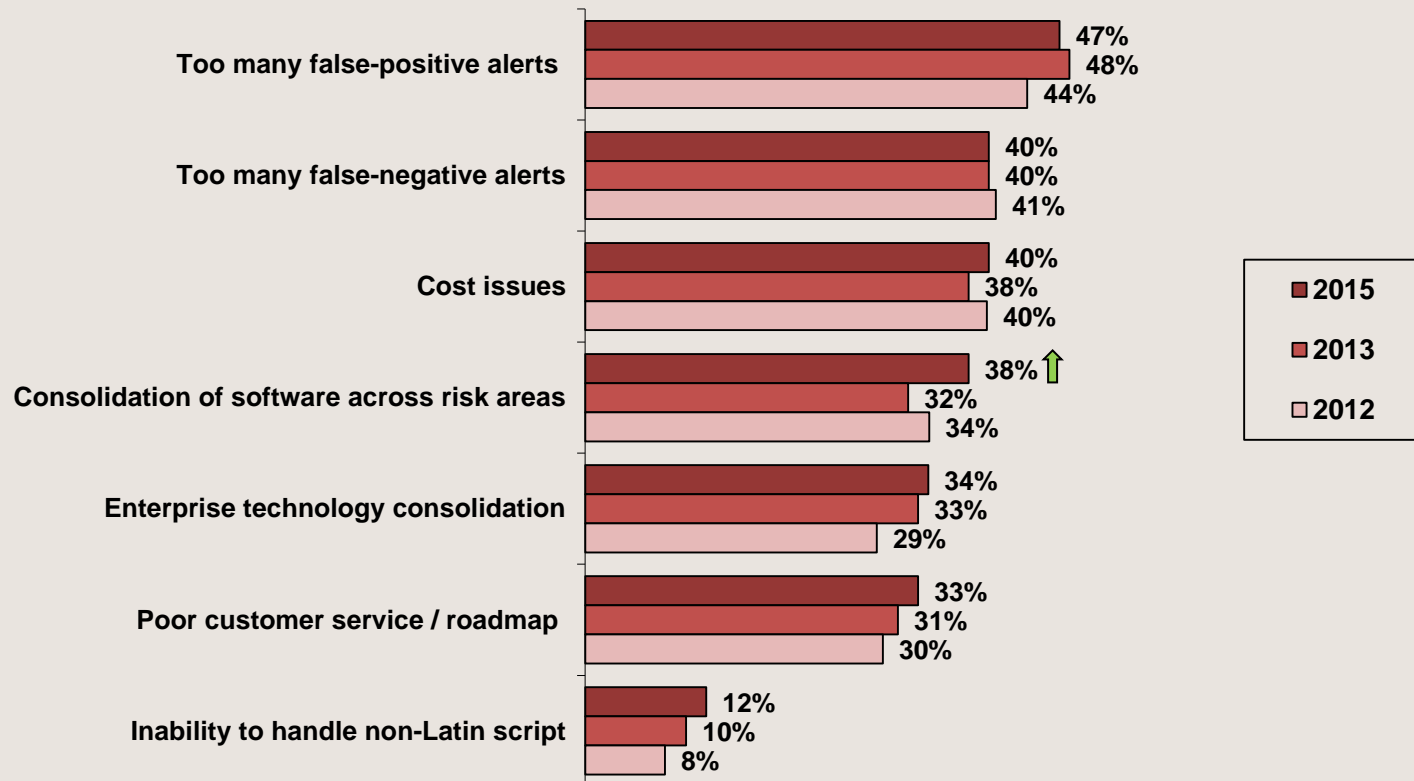Base: Familiar with Client Screening & answered question: 2012 (n=915); 2013 (n=702); 2015 (n=769)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

Reasons Why Don't Use Secondary Identifiers

Among those who don't use secondary identifiers, technology limitations and having data providers that don't offer secondary identifiers are the most common barriers.

[Among Those Familiar with Client Screening Who Do Not Use Any Secondary Identifiers]

Technology limitations
- 2015: 44%
- 2013: 29%
- 2012: 41%

Data provider doesn't offer
- 2015: 35%
- 2013: 19%
- 2012: 25%

Incomplete client data
- 2015: 13%
- 2013: 31%
- 2012: 16%

Lack of confidence in data
- 2015: 9%
- 2013: 5%
- 2012: 4%

Legend:
- ■ 2015
- ■ 2013
- □ 2012

33. What are the main reasons why you do not use any secondary identifiers for client screening?
Base: Use 'none': 2012 (n=68); 2013 (n=42); 2015 (n=54)

Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

Have Client-Screening Technology Solution in Place

More than 85% of respondents work in companies with client-screening technology solutions in place. This proportion has been steady since 2012.

[Among Those Familiar with Client Screening]

- ■ **Client-screening solution in place**
- □ **No solution in place**

	2012	2013	2015
Client-screening solution in place	87%	85%	87%
No solution in place	13%	15%	13%

34. Does your organization have a client-screening technology solution in place?
Base: Familiar with Client Screening & answered question: 2012 (n=976); 2013 (n=731); 2015 (n=817)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

Reasons to Review/Change Client-Screening Technology

Among respondents from companies with client-screening technology solutions in place, excessive false alerts – positive and/or negative – and cost issues are the reasons most likely to prompt companies to review their solutions. Consolidation of software across risk areas is more important in 2015 than in 2013.

[Among Those Familiar with Client Screening & Have Solution in Place]

Reason	2015	2013	2012
Too many false-positive alerts	47%	48%	44%
Too many false-negative alerts	40%	40%	41%
Cost issues	40%	38%	40%
Consolidation of software across risk areas	38% ⬆	32%	34%
Enterprise technology consolidation	34%	33%	29%
Poor customer service / roadmap	33%	31%	30%
Inability to handle non-Latin script	12%	10%	8%

DOW JONES

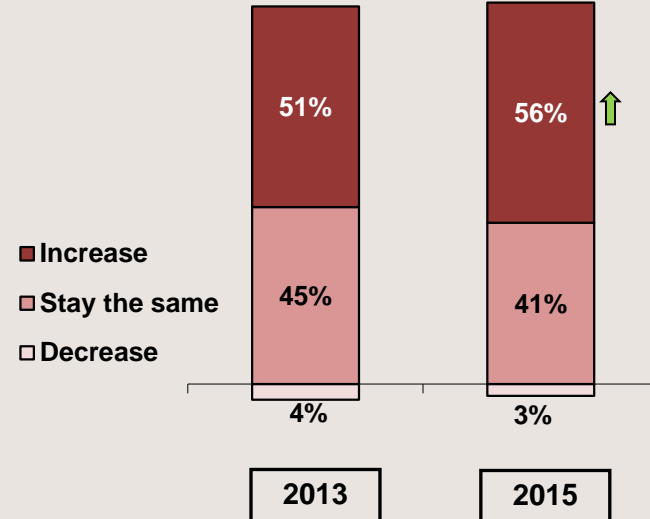# Compliance Solutions & Operational Users

Nearly 90% of respondents prefer compliance solutions that provide content bundled with technology. More than 55% anticipate increases in the number of operational compliance users in their companies in the next 12 months, higher than levels predicted in 2013.

[Among Those Familiar with Client Screening]

Compliance Solution Preference

- ■ **Prefer content bundled with technology**
- □ **No**

	2013	2015
Prefer content bundled	89%	88%
No	11%	12%
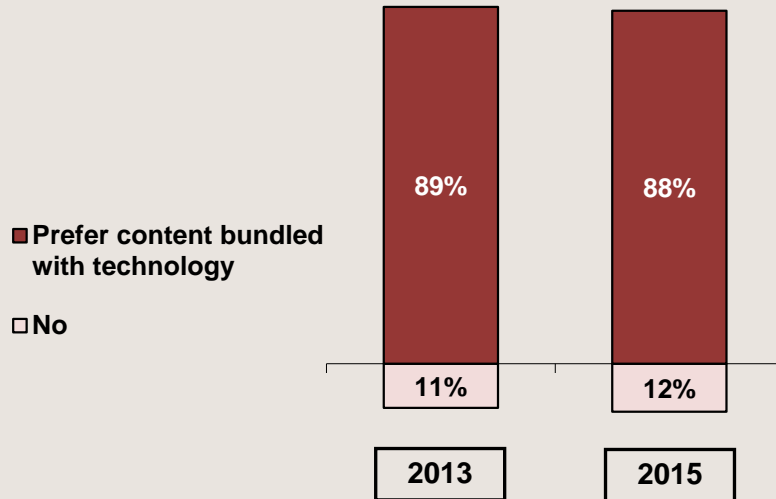
Change in Operational Compliance Users in Next 12 Months

- ■ **Increase**
- ■ **Stay the same**
- □ **Decrease**

	2013	2015
Increase	51%	56%
Stay the same	45%	41%
Decrease	4%	3%

36a. Does your organization prefer compliance solutions that provide content bundled with technology?
Base: Familiar with Client Screening & answered question: 2013 (n=578); 2015 (n=616)
36b. Over the next 12 months, do you expect the number of operational compliance users within your organization to…?
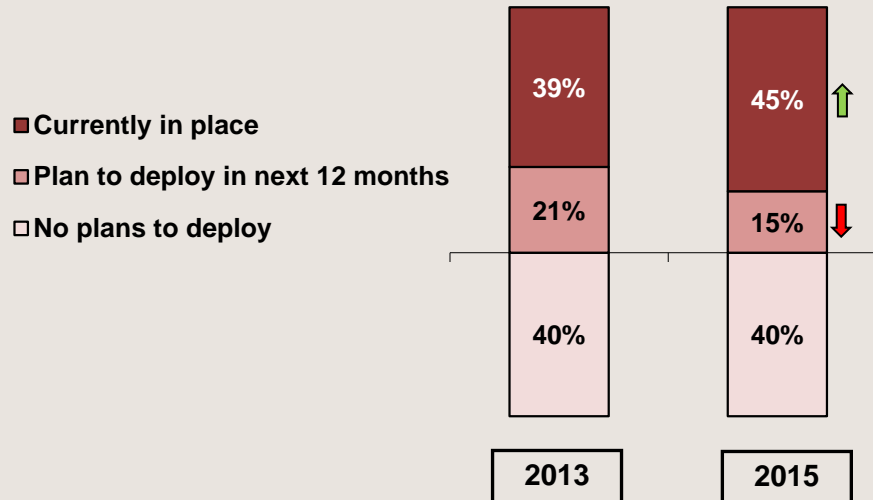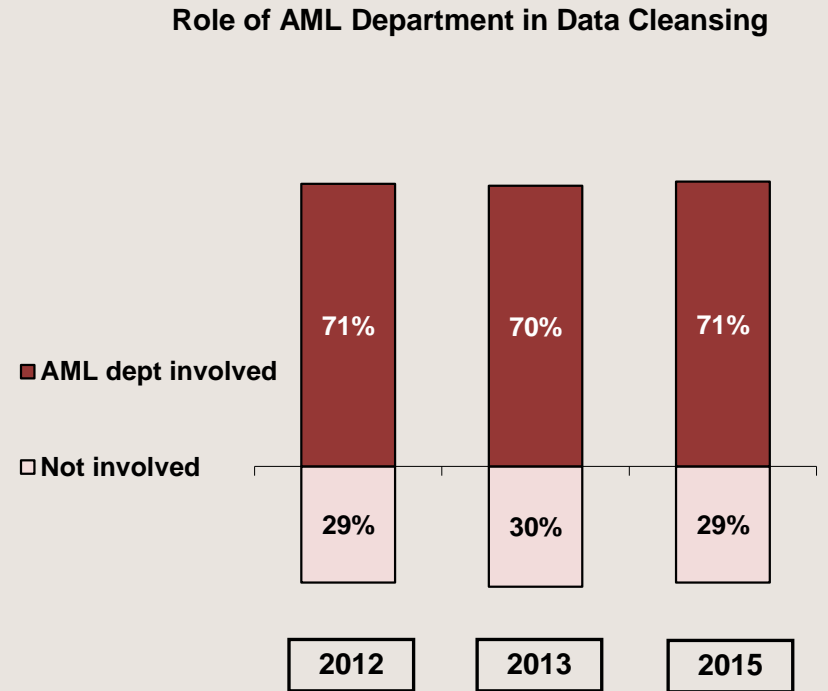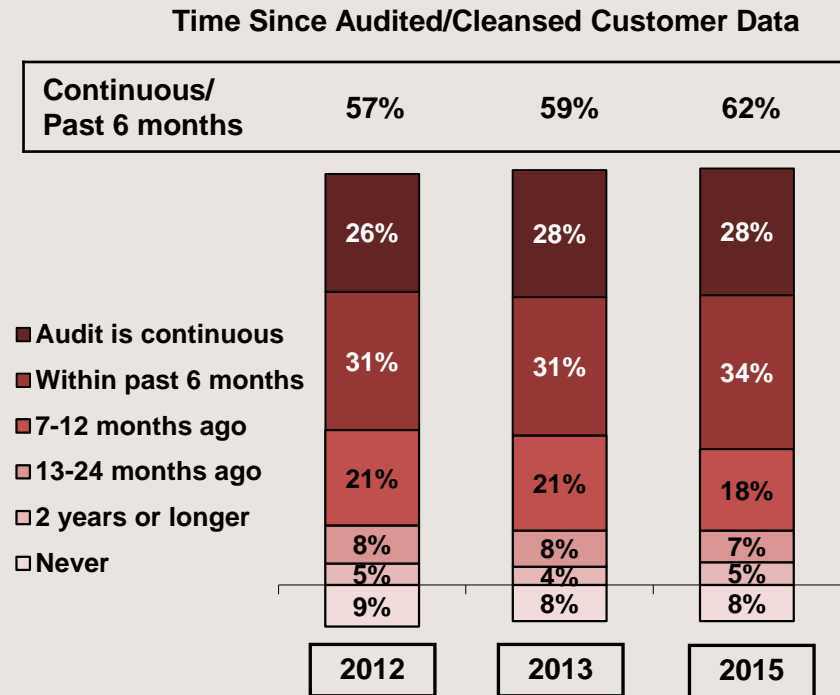Base: Familiar with Client Screening & answered question: 2013 (n=778); 2015 (n=877)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

Government Risk & Compliance Platform Deployment

A larger proportion of respondents report their companies have Government Risk & Compliance platforms in place in 2015 (as some that were planning to implement completed their deployments). As in 2013, 40% claim their companies have no plans to deploy GRC systems.

[Among Those Familiar with Client Screening]

■ **Currently in place**

■ **Plan to deploy in next 12 months**

☐ **No plans to deploy**

	2013	2015
Currently in place	39%	45%
Plan to deploy in next 12 months	21%	15%
No plans to deploy	40%	40%

DOW JONES

Data Cleansing, Fraud & Sanctioned Lists

Customer Data Audits/Cleansing

More than 60% of respondents report their companies have "cleansed" customer data in the past six months, including nearly 30% that conduct continuous audits. The AML department is usually involved in data cleansing.

Time Since Audited/Cleansed Customer Data

Continuous/ Past 6 months	57%	59%	62%

Legend:
- ■ Audit is continuous
- ■ Within past 6 months
- ■ 7-12 months ago
- ■ 13-24 months ago
- □ 2 years or longer
- □ Never

2012: 26% / 31% / 21% / 8% / 5% / 9%
2013: 28% / 31% / 21% / 8% / 4% / 8%
2015: 28% / 34% / 18% / 7% / 5% / 8%

Role of AML Department in Data Cleansing

Legend:
- ■ AML dept involved
- □ Not involved

2012: 71% / 29%
2013: 70% / 30%
2015: 71% / 29%

37. How recently has your organization audited existing customer data (e.g., cleansed the customer database)?
Base: Total answering: 2012 (n=880); 2013 (n=702); 2015 (n=777)
38. Is the AML compliance department involved in data cleansing?
Base: Have cleansed data & answered question: 2012 (n=679); 2013 (n=547); 2015 (n=604)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence
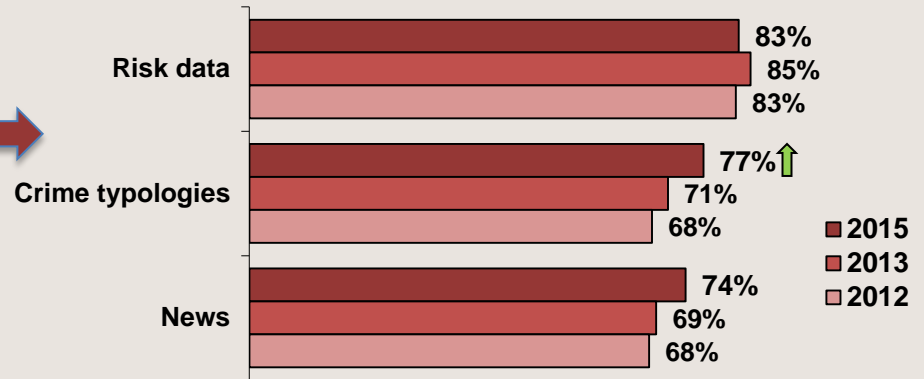
DOW JONES

Fraud Detection & Prevention

The proportion of respondents working in companies in which the AML department handles Fraud detection and prevention is decreasing, although it has not declined significantly during any single survey wave. Risk data remains the most relevant information for managing Fraud, although the importance of crime typologies increases in 2015.

Role of AML Department in Fraud Detection & Prevention

- ■ AML Dept handles Fraud
- □ Not involved

	2012	2013	2015
AML Dept handles Fraud	62%	60%	56%
Not involved	38%	40%	44%

Types of Data Relevant for Managing Fraud

Risk data
- 2015: 83%
- 2013: 85%
- 2012: 83%

Crime typologies
- 2015: 77% ⬆
- 2013: 71%
- 2012: 68%

News
- 2015: 74%
- 2013: 69%
- 2012: 68%

■ 2015
■ 2013
□ 2012

39. Does your AML Department handle or coordinate Fraud detection/prevention? Base: Total answering: 2012 (n=1,146); 2013 (n=890); 2015 (n=990)
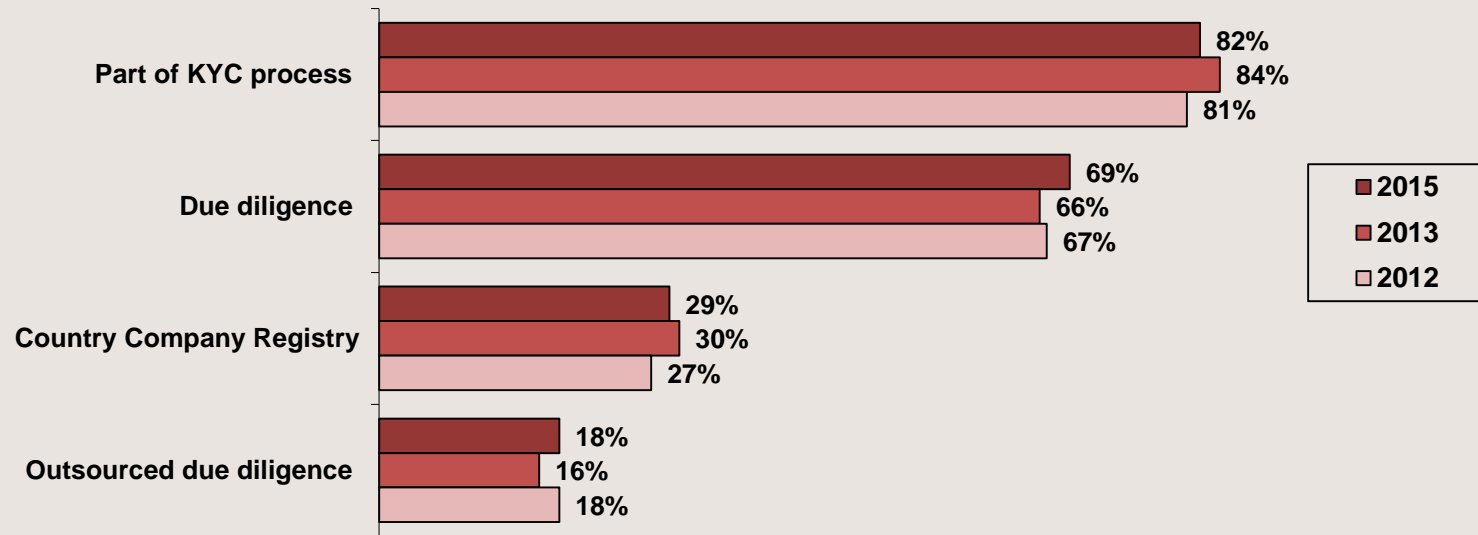40. What types of data are very relevant to your organization for managing fraud?
Base: AML Dep't involved in Fraud & answered question: 2012 (n=652); 2013 (n=486); 2015 (n=511)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

How Companies Verify Beneficial Ownership

Beneficial ownership is usually verified as part of the KYC process or through internal due diligence.

Part of KYC process
- 2015: 82%
- 2013: 84%
- 2012: 81%

Due diligence
- 2015: 69%
- 2013: 66%
- 2012: 67%

Country Company Registry
- 2015: 29%
- 2013: 30%
- 2012: 27%

Outsourced due diligence
- 2015: 18%
- 2013: 16%
- 2012: 18%

Legend:
- ■ 2015
- ■ 2013
- □ 2012

DOW JONES

Beneficial Ownership Verification Required

Over 70% of respondents report their companies adhere to standards of either 10% or 25% beneficial ownership verification. This proportion is rising, although it has not increased significantly during any single survey wave. Nearly one-tenth claim their companies require 100% verification.

Average	33%	32%	29%

"Other" mentions (2015):
- *Risk-based*
- *Varies by country, entity type, LOB*
- *No formal requirements*

Legend:
- ■ Other
- □ 100%
- ■ 26%-99%
- ◌ 25% ◌
- ■ 11%-24%
- ◌ 10% ◌
- ■ 1%-9%

2012
- 9%
- 13%
- 7%
- 38%
- 2%
- 27%
- 4%
- 65%

2013
- 6%
- 12%
- 6%
- 42%
- 3%
- 26%
- 5%
- 68%
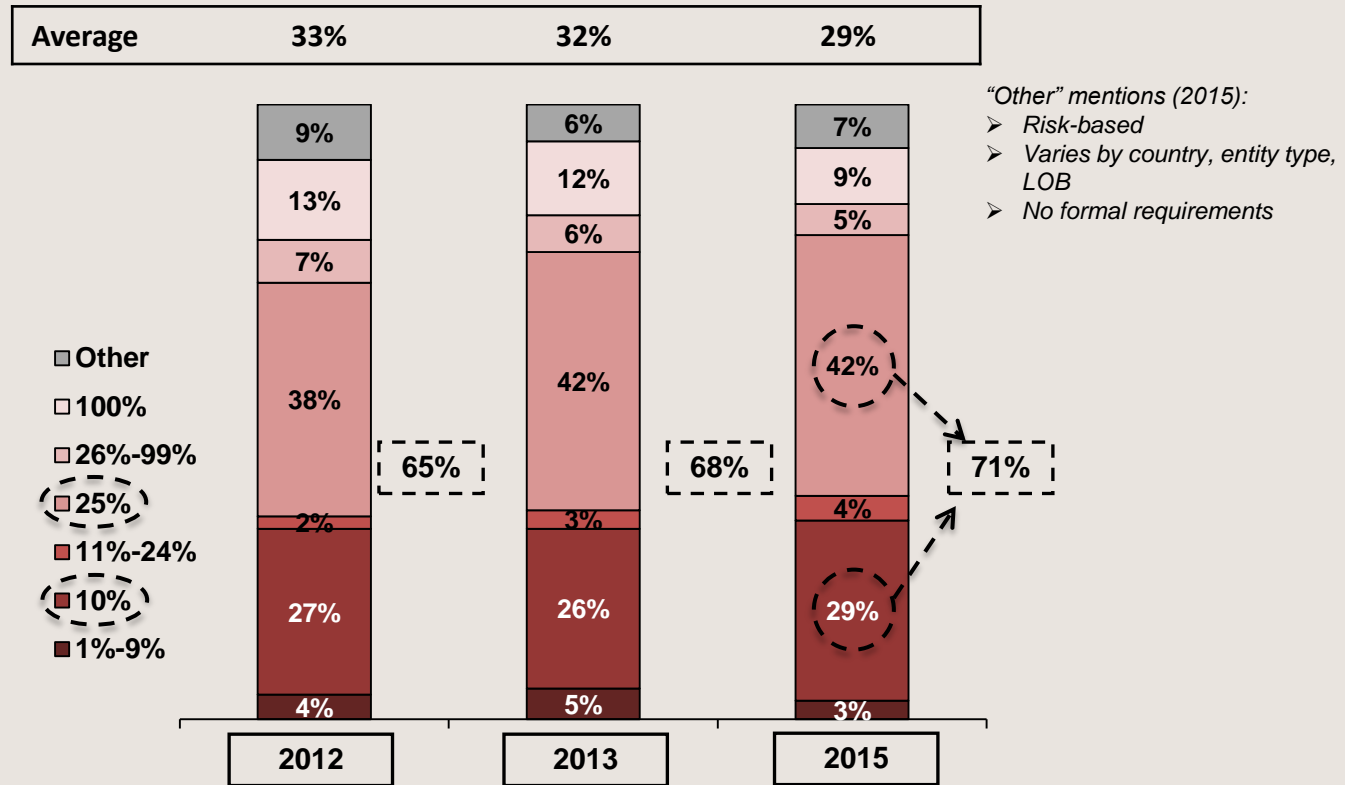
2015
- 7%
- 9%
- 5%
- 42%
- 4%
- 29%
- 3%
- 71%

42. To what percentage do you require beneficial ownership verification? Base: Total answering: 2012 (n=870); 2013 (n=658); 2015 (n=767)
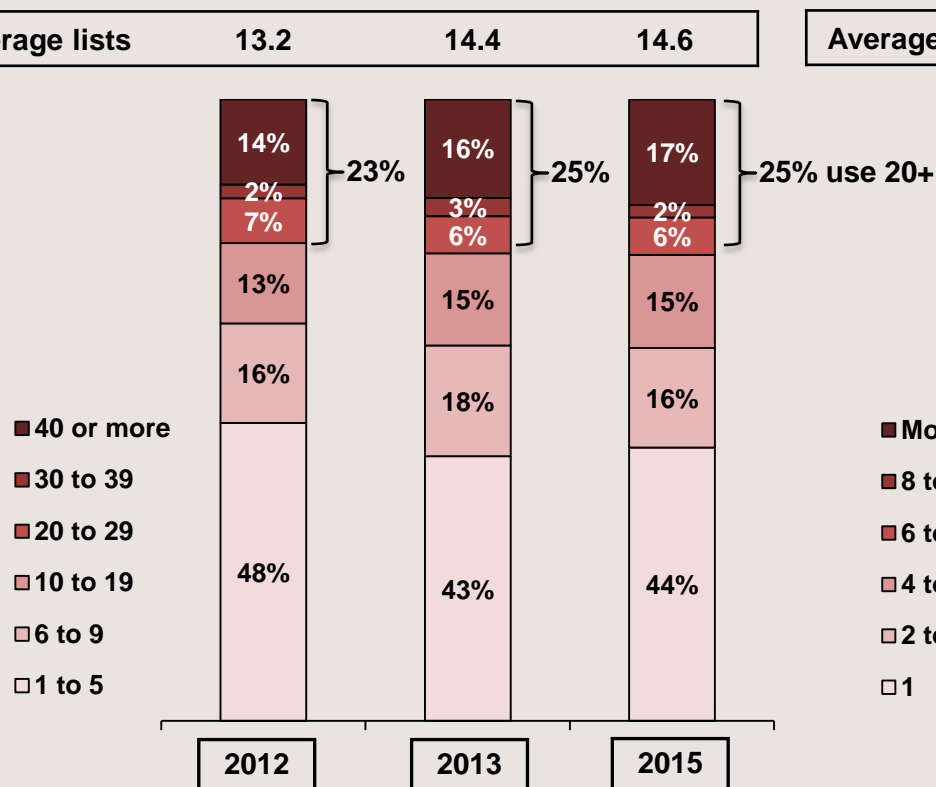
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

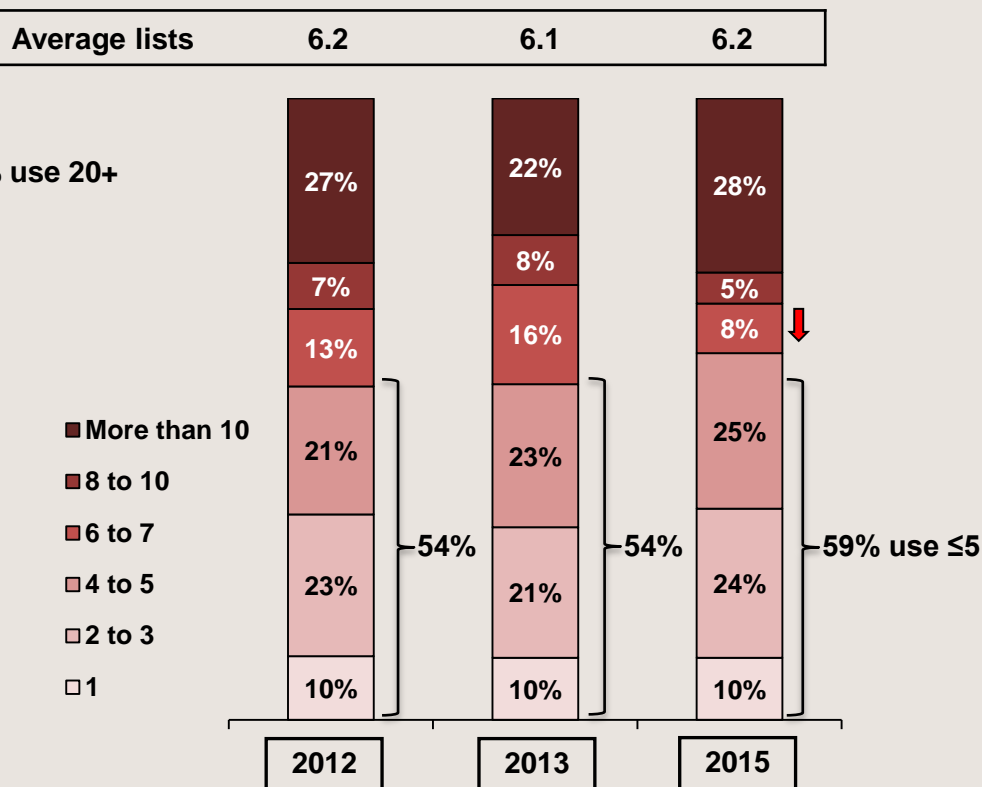**DOW JONES**

Usage of Sanctioned/Official Lists

The number of sanctioned/official lists for client screening varies widely, with nearly 45% of respondents reporting their companies use five or fewer lists and one-quarter claiming 20 or more lists. Payment filtering list usage also varies, but at lower levels, with most respondents estimating their companies use five or fewer lists.

[Among Those Responsible for Client Screening and/or Payments Filtering]

Number of Lists Used in Client Screening

Average lists	13.2	14.4	14.6

2012:
- 14% (40 or more)
- 2% (30 to 39)
- 7% (20 to 29)
- 13% (10 to 19)
- 16% (6 to 9)
- 48% (1 to 5)

23% use 20+

2013:
- 16% (40 or more)
- 3% (30 to 39)
- 6% (20 to 29)
- 15% (10 to 19)
- 18% (6 to 9)
- 43% (1 to 5)

25% use 20+

2015:
- 17% (40 or more)
- 2% (30 to 39)
- 6% (20 to 29)
- 15% (10 to 19)
- 16% (6 to 9)
- 44% (1 to 5)

25% use 20+

Legend:
- 40 or more
- 30 to 39
- 20 to 29
- 10 to 19
- 6 to 9
- 1 to 5

Number of Lists Used in Payments Filtering

Average lists	6.2	6.1	6.2

2012:
- 27% (More than 10)
- 7% (8 to 10)
- 13% (6 to 7)
- 21% (4 to 5)
- 23% (2 to 3)
- 10% (1)

54% use ≤5

2013:
- 22% (More than 10)
- 8% (8 to 10)
- 16% (6 to 7)
- 23% (4 to 5)
- 21% (2 to 3)
- 10% (1)

54% use ≤5

2015:
- 28% (More than 10)
- 5% (8 to 10)
- 8% (6 to 7)
- 25% (4 to 5)
- 24% (2 to 3)
- 10% (1)

59% use ≤5

Legend:
- More than 10
- 8 to 10
- 6 to 7
- 4 to 5
- 2 to 3
- 1

43. How many sanctioned/official lists do you screen against for client screening? Base: Familiar with Client Screening: 2012 (n=1,113); 2013 (n=864); 2015 (n=969)
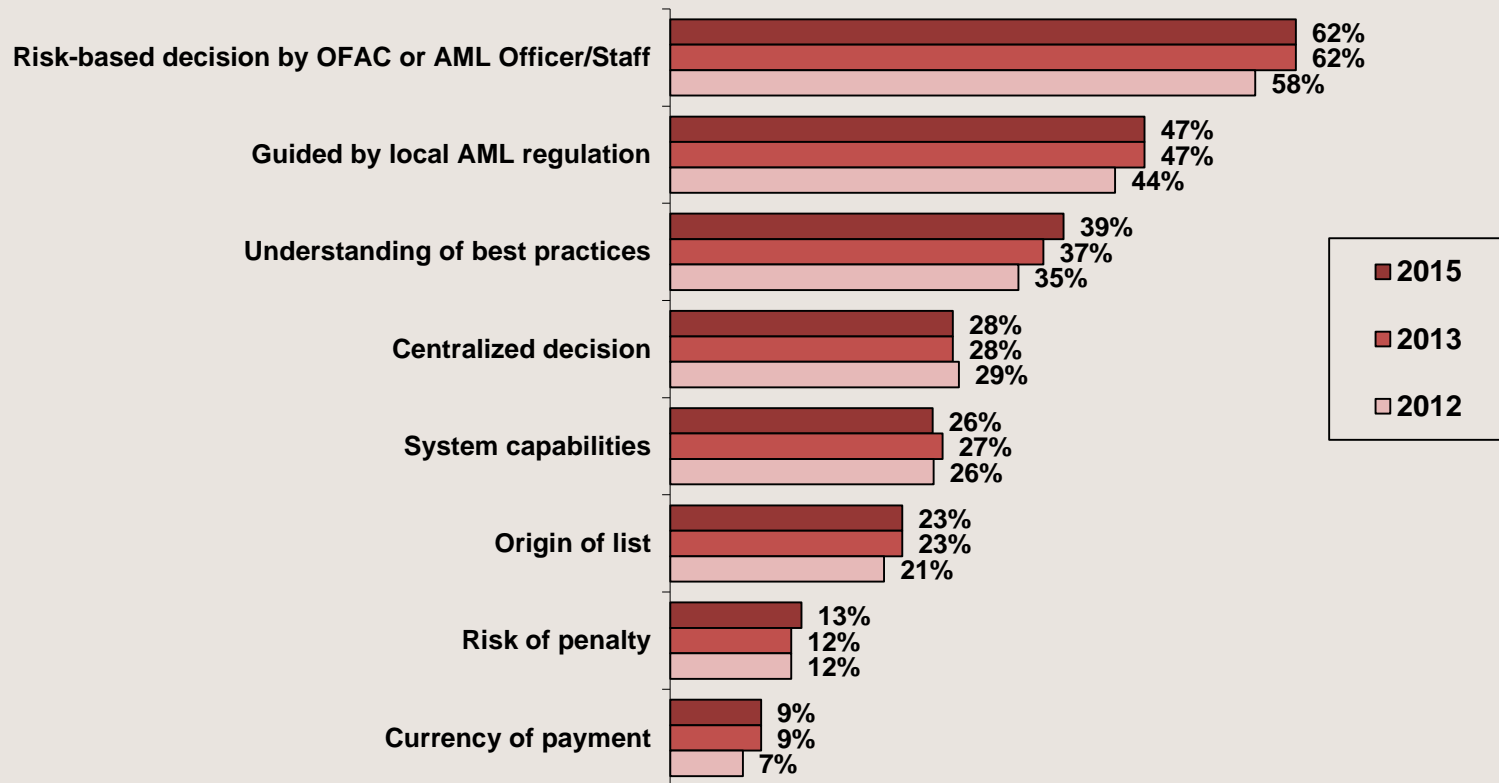44. How many sanctioned/official lists do you screen against for payments filtering? Base: Payments filtering is main function: 2012 (n=136); 2013 (n=103); 2015 (n=102)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

Choosing Lists For Client Screening & Payments Filtering

Most respondents work in AML departments that make risk-based decisions in choosing which sanctioned/official lists to use in client screening and/or payments filtering. Local AML regulations provide guidance in choosing lists for nearly half of respondents. Penalty risks and currency of payment are the least important factors.

[Among Those Responsible for Client Screening and/or Payments Filtering]

Risk-based decision by OFAC or AML Officer/Staff
- 62% (2015)
- 62% (2013)
- 58% (2012)

Guided by local AML regulation
- 47% (2015)
- 47% (2013)
- 44% (2012)

Understanding of best practices
- 39% (2015)
- 37% (2013)
- 35% (2012)

Centralized decision
- 28% (2015)
- 28% (2013)
- 29% (2012)

System capabilities
- 26% (2015)
- 27% (2013)
- 26% (2012)

Origin of list
- 23% (2015)
- 23% (2013)
- 21% (2012)

Risk of penalty
- 13% (2015)
- 12% (2013)
- 12% (2012)

Currency of payment
- 9% (2015)
- 9% (2013)
- 7% (2012)

Legend: ■ 2015 ■ 2013 □ 2012

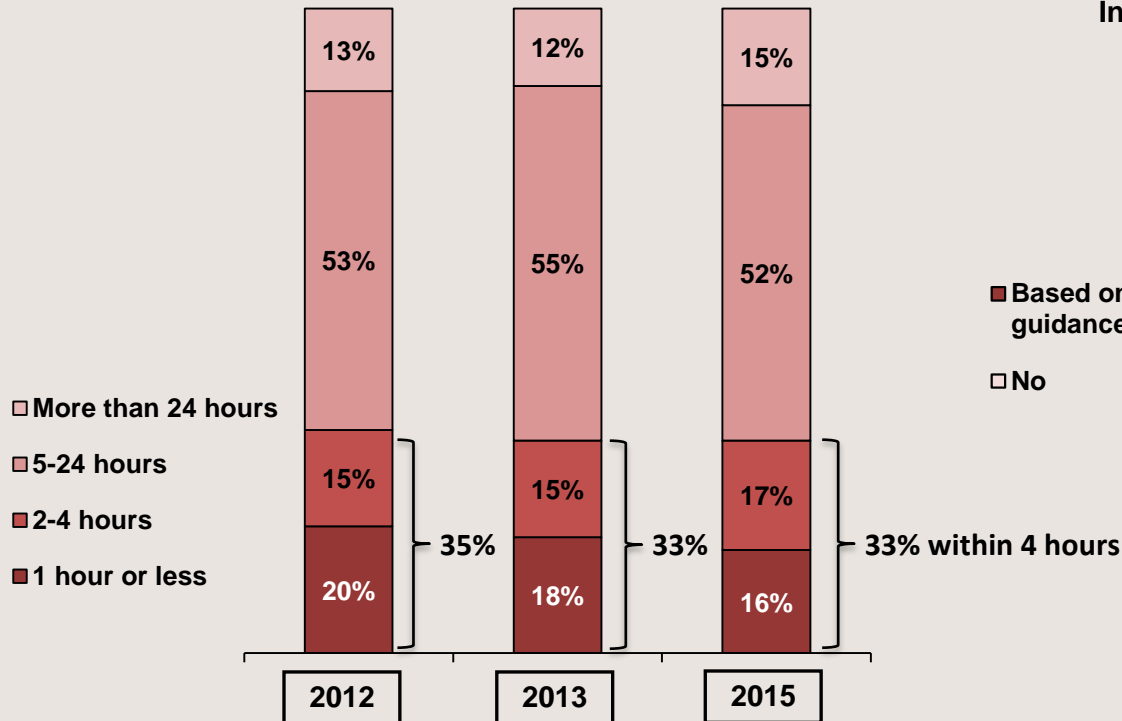45. How do you decide which sanctioned/official lists to screen against?
Base: Familiar with Client Screening or have Payments filtering as main function & answered question: 2012 (n=969); 2013 (n=728); 2015 (n=809)

Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence
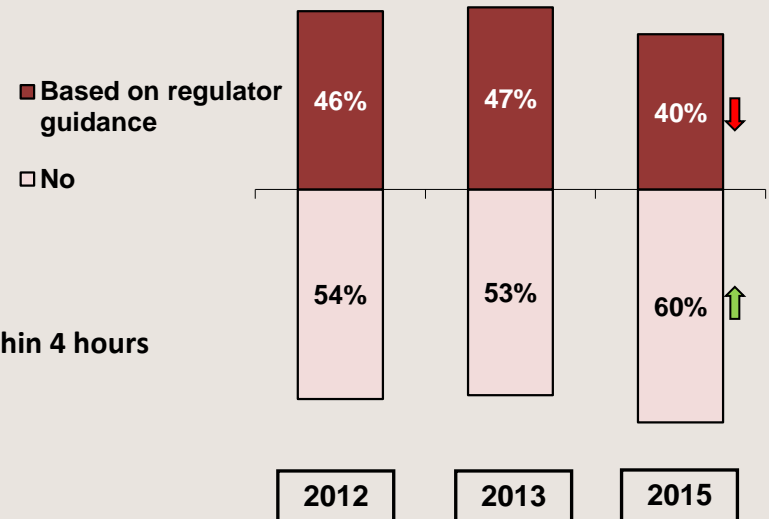
DOW JONES

Internal Updates to Sanctioned/Official Lists

About 85% of respondents expect internal lists to be updated within 24 hours of changes to sanctioned/official lists, including one-third that expect updates within four hours. Fewer respondents report their companies are basing their expectations on regulator guidance in 2015.

Acceptable Delay in Getting Internal Lists Updated

Legend:
- □ More than 24 hours
- ■ 5-24 hours
- ■ 2-4 hours
- ■ 1 hour or less

	2012	2013	2015
More than 24 hours	13%	12%	15%
5-24 hours	53%	55%	52%
2-4 hours	15%	15%	17%
1 hour or less	20%	18%	16%
within 4 hours	35%	33%	33% within 4 hours

Internal Expectations Regarding Speed of List Updates

Legend:
- ■ Based on regulator guidance
- □ No

	2012	2013	2015
Based on regulator guidance	46%	47%	40% ↓
No	54%	53%	60% ↑

46. What is an acceptable delay in getting internal lists updated when a change is made to a sanctioned/official list?
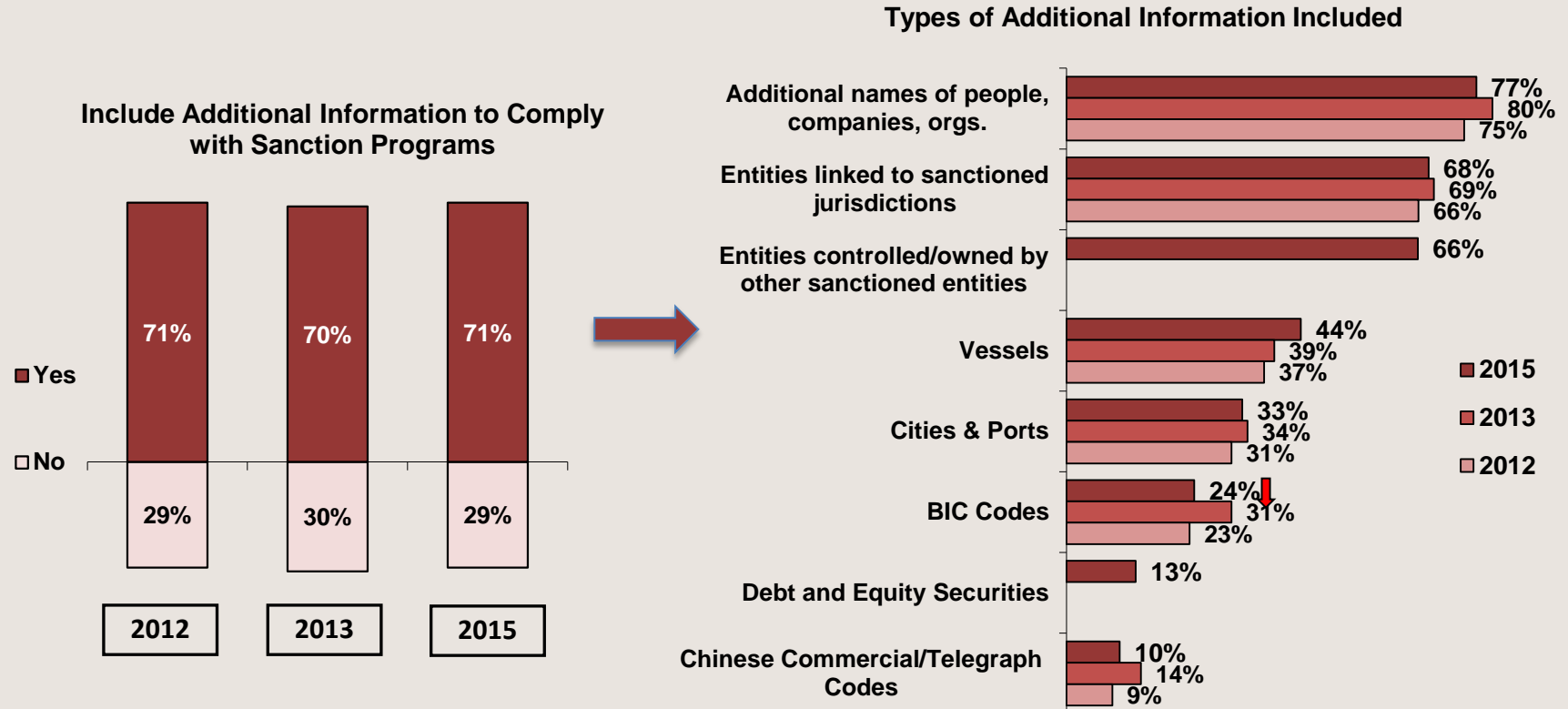Base: Total answering: 2012 (n=865); 2013 (n=652); 2015 (n=705)
47. Is this internal expectation regarding speed of sanctioned/official list updates based on regulator guidance?
Base: Total answering: 2012 (n=655); 2013 (n=493); 2015 (n=549)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

Additional Information Used in Sanctioned/Official Lists

Most respondents report their companies include information other than the entities named on sanctioned/official lists in their screening processes. Additional names of people/companies/organizations, entities linked to sanctioned jurisdictions and entities controlled or owned by other sanctioned entities are the most frequently used supplemental information.

Include Additional Information to Comply with Sanction Programs

- Yes
- No

Year	Yes	No
2012	71%	29%
2013	70%	30%
2015	71%	29%

Types of Additional Information Included

Legend: 2015, 2013, 2012

Category	2015	2013	2012
Additional names of people, companies, orgs.	77%	80%	75%
Entities linked to sanctioned jurisdictions	68%	69%	66%
Entities controlled/owned by other sanctioned entities	66%		
Vessels	44%	39%	37%
Cities & Ports	33%	34%	31%
BIC Codes	24%	31%	23%
Debt and Equity Securities	13%		
Chinese Commercial/Telegraph Codes	10%	14%	9%

DOW JONES

De-Risking

Exiting Business Segments Due to Regulatory Risk

More than one-third of respondents report their companies have exited a full business line or segment of business in the past 12 months due to perceived regulatory risk and/or the organization's inability to manage the risk. About 30% of respondents claim their companies are planning to exit and/or are investigating the possibility of exiting a business line or segment in the next 12 months due to perceived regulatory risk.

Have Exited Business Line/Segment in Past 12 Months

Net: 35% have exited business line or segment of business for at least one of the reasons

■Yes

30%	21%

□No

70%	79%

Due only to perceived regulatory risk | **Due to inability to manage the risk**

2015 only

Plans To Exit Business Line/Segment in Next 12 Months
(multiple responses allowed)

Planning to exit — 10%

Investigating possibility of exiting — 24%

Net: 30% are planning to exit and/or or investigating the possibility of exiting

Not planning or investigating exit — 70%

2015 only

49a. Has your organization exited a full business line or segment of business in the past 12 months due only to perceived regulatory risk? Base: Total answering: 2015 (n=853)
49b. Has your organization exited a full business line or segment of business in the past 12 months due to the organization's inability to manage the risk?
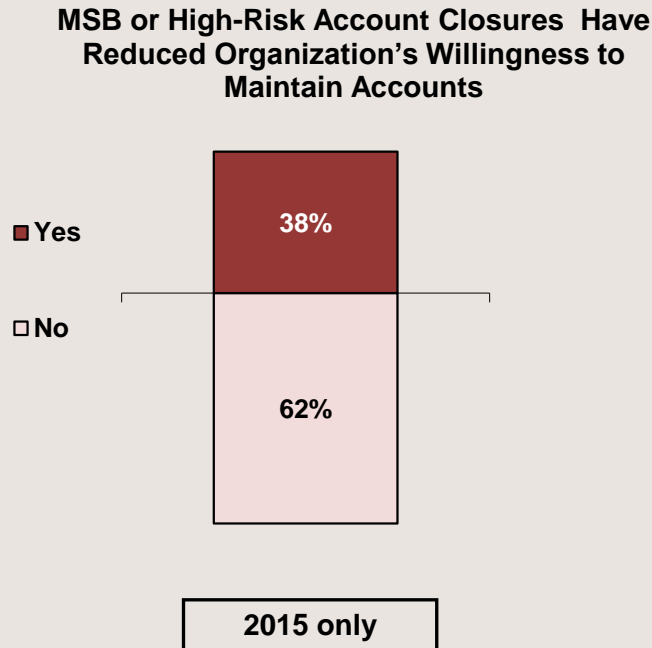Base: Total answering: 2015 (n=827)
49c. Is your organization planning to exit and/or investigating the possibility of exiting any full business segments due to perceived regulatory risk in the next 12 months?
Base: Total answering: 2015 (n=640)

DOW JONES

FinCEN Impact on Maintaining High-Risk Accounts

Nearly 40% of respondents acknowledge that the recent FinCEN statement regarding reported mass closures of money service businesses (MSB) or other high-risk accounts has reduced their organizations' willingness to continue maintaining these types of accounts.

**MSB or High-Risk Account Closures Have
Reduced Organization's Willingness to
Maintain Accounts**

■Yes

38%

□No

62%

2015 only

DOW JONES

Industry Memberships & Conference Attendance

Industry Group Memberships & Affiliations

Over 80% of respondents represent member companies of ACAMS, which was the source for recruiting respondents for this survey. Notable proportions are also ABA and ACFE members. For industry guidance, three-quarters say they rely on local regulators and almost two-thirds consult local financial associations. The proportion reporting receiving guidance from the Wolfsberg Group increased in 2015.

Industry Group Memberships

Group	2015	2013	2012
ACAMS	85%	83%	83%
ABA	38%	37%	39%
ACFE	26%	25%	27%
SIFMA	10%	10%	10%
BBA	7%	5%	6%
Other national orgs	11%	12%	14%
Others	11%	11%	12%
None	8%	8%	6%

Sources of Guidance

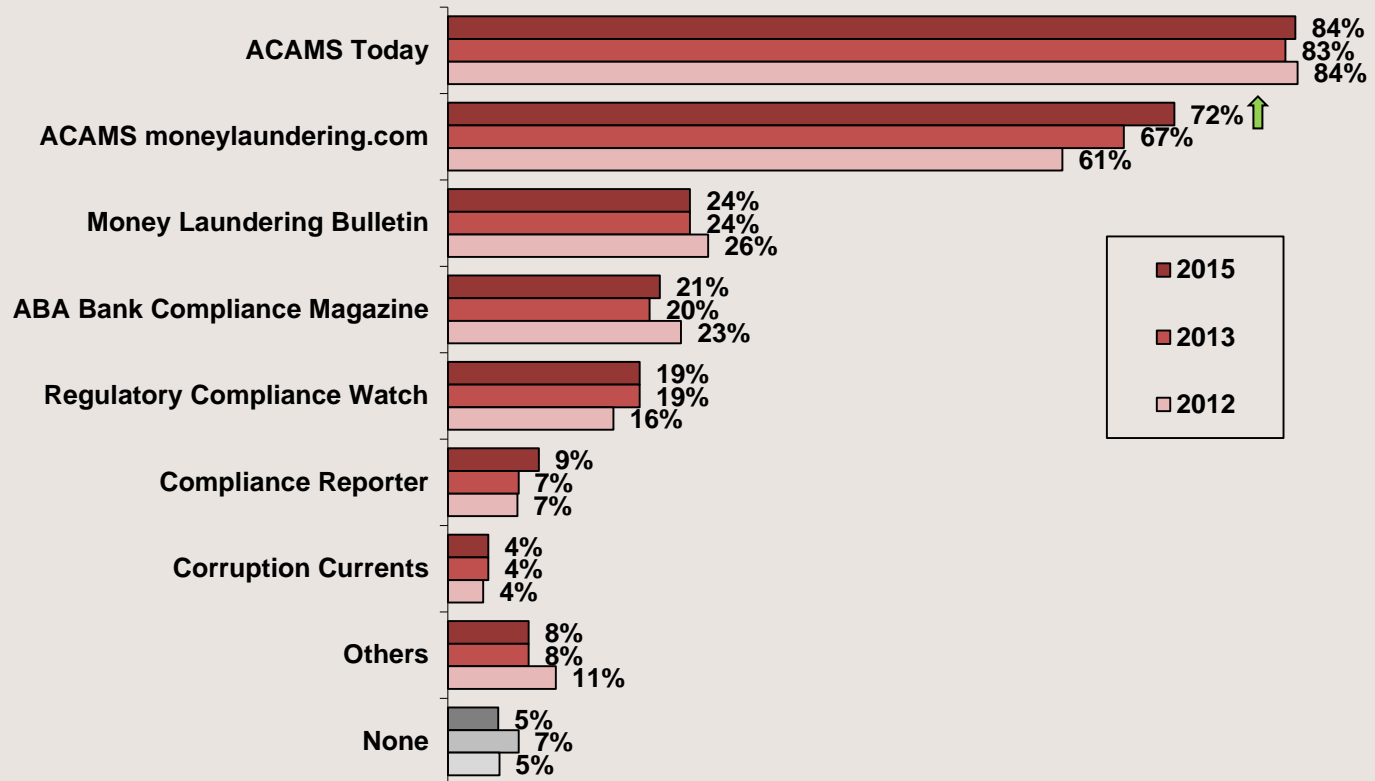| Source	2015	2013	2012
Local regulator	78%	75%	77%
Local FI associations/groups	63%	63%	62%
Wolfsberg Group	41% ⬆	34%	34%
JML Steering Group (UK)	18%	16%	17%
Others	12%	11%	11%

- 2015
- 2013
- 2012

51. What industry groups do you or your organization belong to? Base: Total: 2012 (n=1,275) ; 2013 (n=989); 2015 (n=1,118)
50. What industry guidance do you or others in your organization rely on? Base: Total: 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)

Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

Compliance Publication Readership

ACAMS Today remains the most widely read compliance publication among this population. However, readership of ACAMS moneylaundering.com increased again in 2015. Readership of other publications was unchanged from 2013.

ACAMS Today
- 84% (2015)
- 83% (2013)
- 84% (2012)

ACAMS moneylaundering.com
- 72% ⬆
- 67%
- 61%

Money Laundering Bulletin
- 24%
- 24%
- 26%

ABA Bank Compliance Magazine
- 21%
- 20%
- 23%

Regulatory Compliance Watch
- 19%
- 19%
- 16%

Compliance Reporter
- 9%
- 7%
- 7%

Corruption Currents
- 4%
- 4%
- 4%

Others
- 8%
- 8%
- 11%

None
- 5%
- 7%
- 5%

Legend: ■ 2015 ■ 2013 □ 2012

52. What compliance publications do you read (regardless of whether you personally subscribe)?
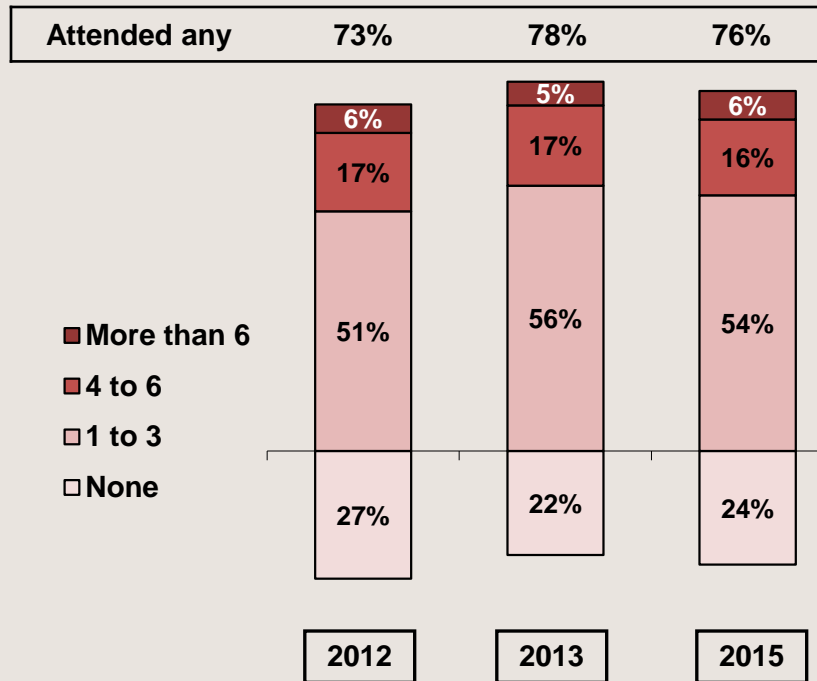Base: Total: 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence
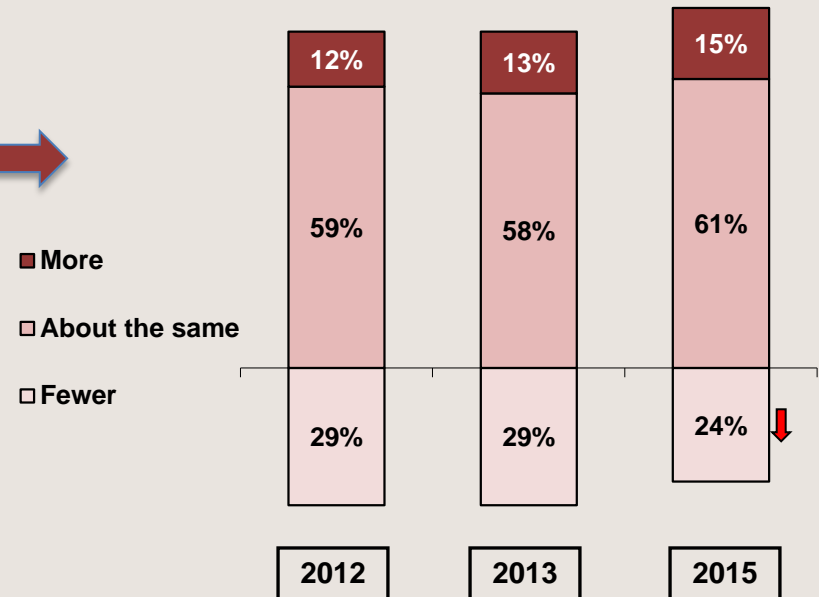
DOW JONES

Conference Attendance

Conference attendance was steady in 2015 compared to 2013, with over 75% of respondents reporting they attended at least one event in the past two years. Most reported increased or stable conference attendance rates versus the previous year while the proportion who attended fewer conferences decreased in 2015.

Conferences Attended in Past Two Years

Attended any	73%	78%	76%

Legend:
- ■ More than 6
- ■ 4 to 6
- □ 1 to 3
- □ None

	2012	2013	2015
More than 6	6%	5%	6%
4 to 6	17%	17%	16%
1 to 3	51%	56%	54%
None	27%	22%	24%

Change in Conferences Attended in Past Year

Legend:
- ■ More
- □ About the same
- □ Fewer

	2012	2013	2015
More	12%	13%	15%
About the same	59%	58%	61%
Fewer	29%	29%	24% ⬇

53. How many conferences have you personally attended in the past two years? Base: Total: 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)
56. Have you attended more, about the same number or fewer events in the last 12 months compared to the previous year?
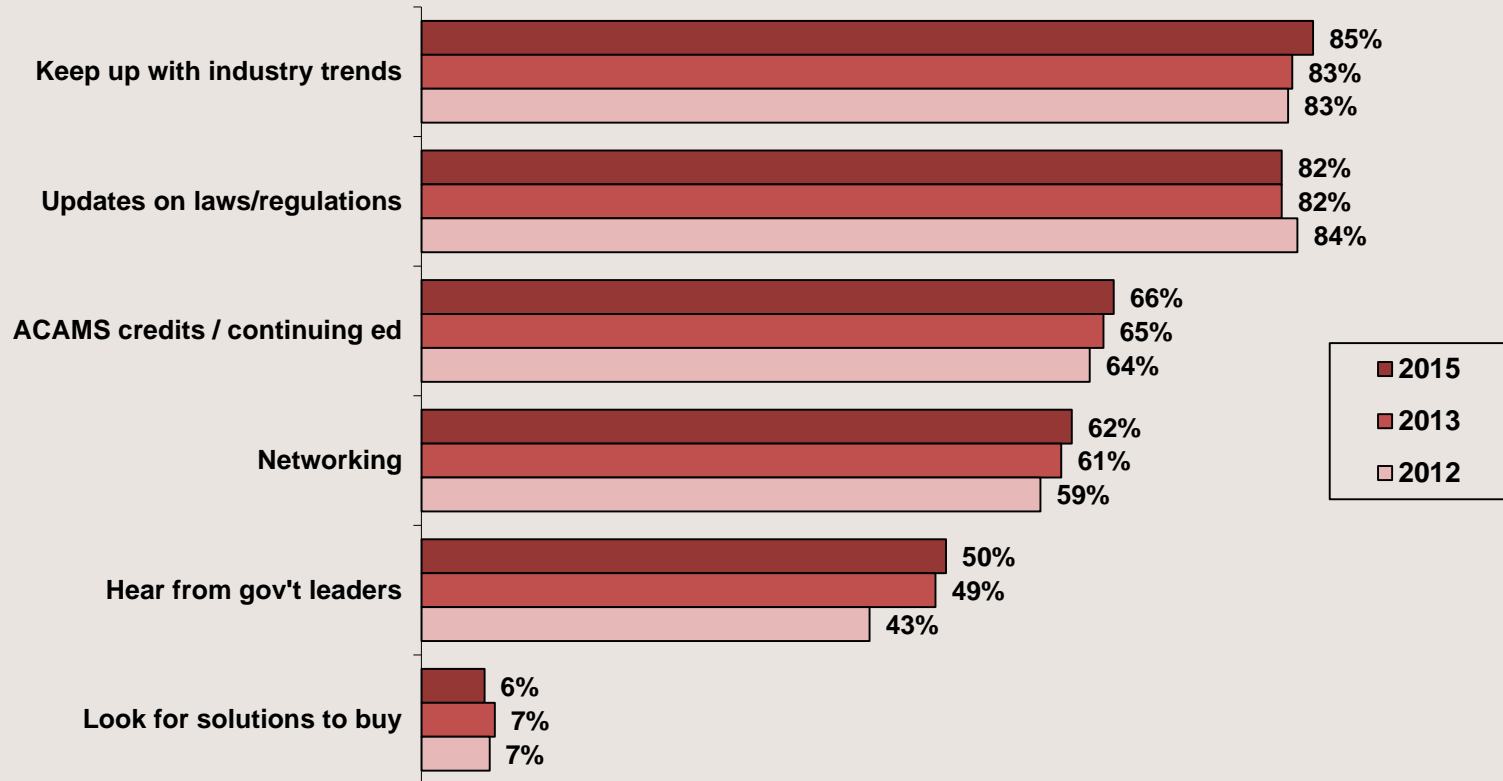Base: Total: 2012 (n=1,275) ; 2013 (n=989); 2015 (n=1,118)

Green and **Red** arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

Reasons for Attending Conferences

Keeping up with industry trends and changes in laws/regulations remain the key reasons for attending conferences. Getting ACAMS certification credits (or other continuing education credits) and networking are also mentioned by 60% or more of conference attendees as motivators for attending.

[Among Those Attending Conferences in the Past Two Years]

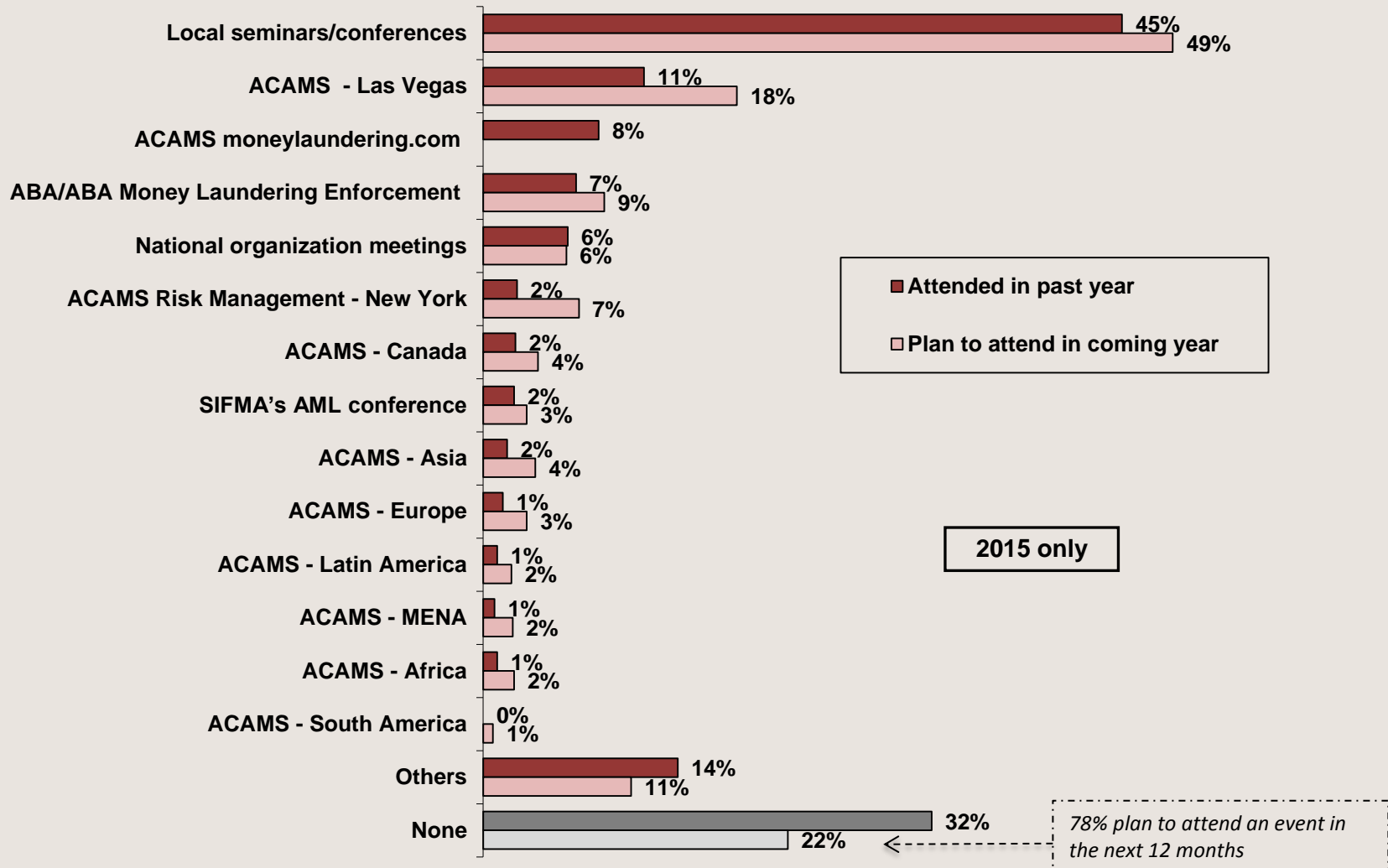| Reason	2015	2013	2012
Keep up with industry trends	85%	83%	83%
Updates on laws/regulations	82%	82%	84%
ACAMS credits / continuing ed	66%	65%	64%
Networking	62%	61%	59%
Hear from gov't leaders	50%	49%	43%
Look for solutions to buy	6%	7%	7%

57. Which of these are very important reasons why you attend events?
Base: Attended conference in past two years: 2012 (n=980); 2013 (n=773); 2015 (n=852)

Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

Conferences Attended in Past Year & Plans for Coming Year

About 45% of respondents attended local seminars and conferences in the past year. Among major conferences, ACAMS – Las Vegas and ACAMS moneylaundering.com were the meetings attended by most respondents in the past year. Nearly 80% plan to attend some event in the coming year, with ACAMS – Las Vegas mentioned most often among major conferences.

Conference	Attended in past year	Plan to attend in coming year
Local seminars/conferences	45%	49%
ACAMS - Las Vegas	11%	18%
ACAMS moneylaundering.com	8%	
ABA/ABA Money Laundering Enforcement	7%	9%
National organization meetings	6%	6%
ACAMS Risk Management - New York	2%	7%
ACAMS - Canada	2%	4%
SIFMA's AML conference	2%	3%
ACAMS - Asia	2%	4%
ACAMS - Europe	1%	3%
ACAMS - Latin America	1%	2%
ACAMS - MENA	1%	2%
ACAMS - Africa	1%	2%
ACAMS - South America	0%	1%
Others	14%	11%
None	32%	22%

2015 only

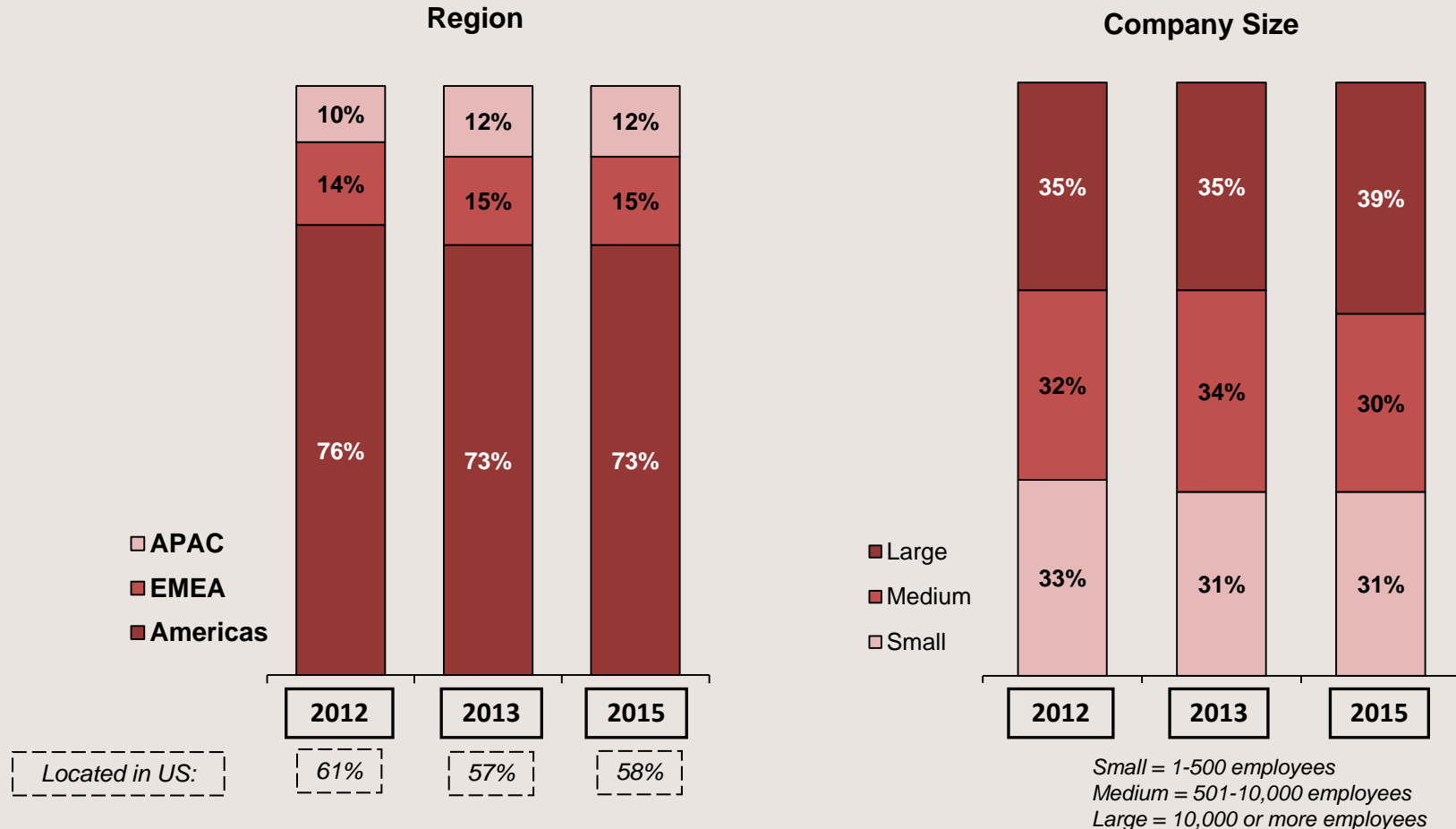*78% plan to attend an event in the next 12 months*

54. Which conferences have you personally attended in the past year? Base: 2015 (n=1,118)
55. Which conferences do you personally plan on attending in the next 12 months? Base: Total: 2015 (n=1,118)

DOW JONES

Respondent Profiles

Company Geography & Size

As in previous years, about three-quarters of respondents are from companies in the Americas, including nearly 60% from the US. Respondents are split between small, medium and large companies.

Region

	2012	2013	2015
APAC	10%	12%	12%
EMEA	14%	15%	15%
Americas	76%	73%	73%

Located in US: 61% (2012), 57% (2013), 58% (2015)

Company Size

	2012	2013	2015
Large	35%	35%	39%
Medium	32%	34%	30%
Small	33%	31%	31%

Small = 1-500 employees
Medium = 501-10,000 employees
Large = 10,000 or more employees

58. Approximately how many employees does your organization have at all locations worldwide?
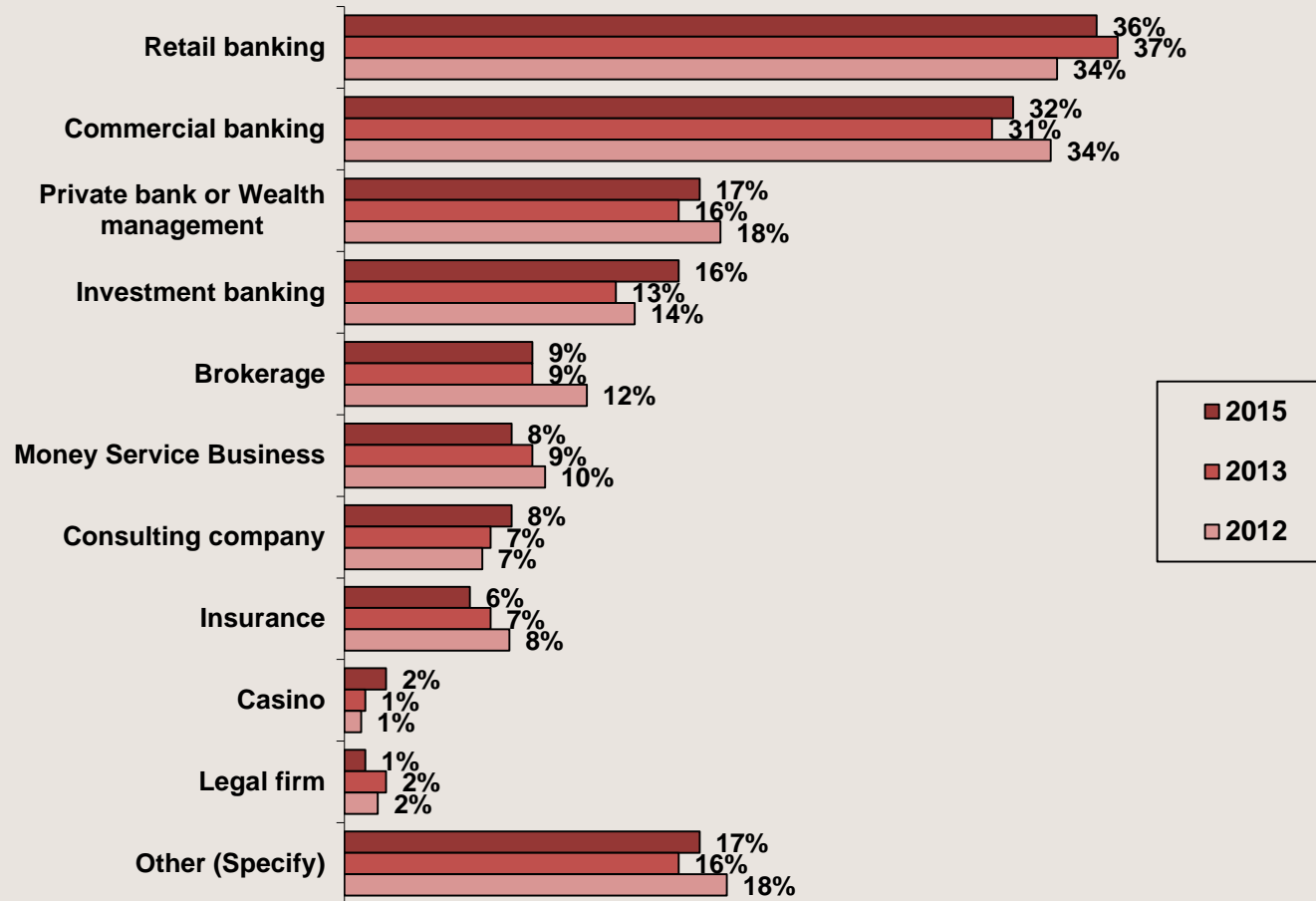60. In what country is your job located?
Base: Total: 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)
Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

Type of Organization

In 2015, as in previous years, retail and commercial banking were the largest industries represented among respondents, followed by private banking/wealth management and investment banking.

Retail banking
- 36% (2015)
- 37% (2013)
- 34% (2012)

Commercial banking
- 32% (2015)
- 31% (2013)
- 34% (2012)

Private bank or Wealth management
- 17% (2015)
- 16% (2013)
- 18% (2012)

Investment banking
- 16% (2015)
- 13% (2013)
- 14% (2012)

Brokerage
- 9% (2015)
- 9% (2013)
- 12% (2012)

Money Service Business
- 8% (2015)
- 9% (2013)
- 10% (2012)

Consulting company
- 8% (2015)
- 7% (2013)
- 7% (2012)

Insurance
- 6% (2015)
- 7% (2013)
- 8% (2012)

Casino
- 2% (2015)
- 1% (2013)
- 1% (2012)

Legal firm
- 1% (2015)
- 2% (2013)
- 2% (2012)

Other (Specify)
- 17% (2015)
- 16% (2013)
- 18% (2012)
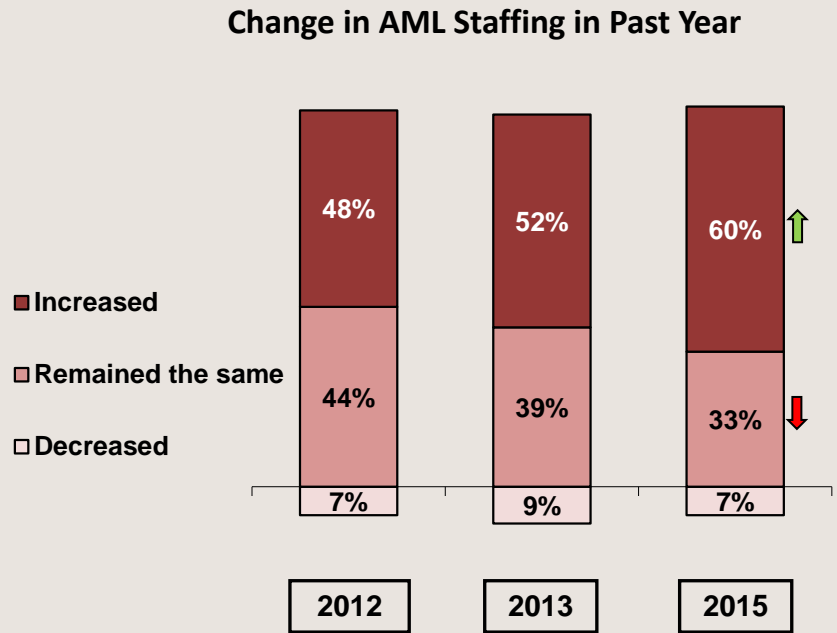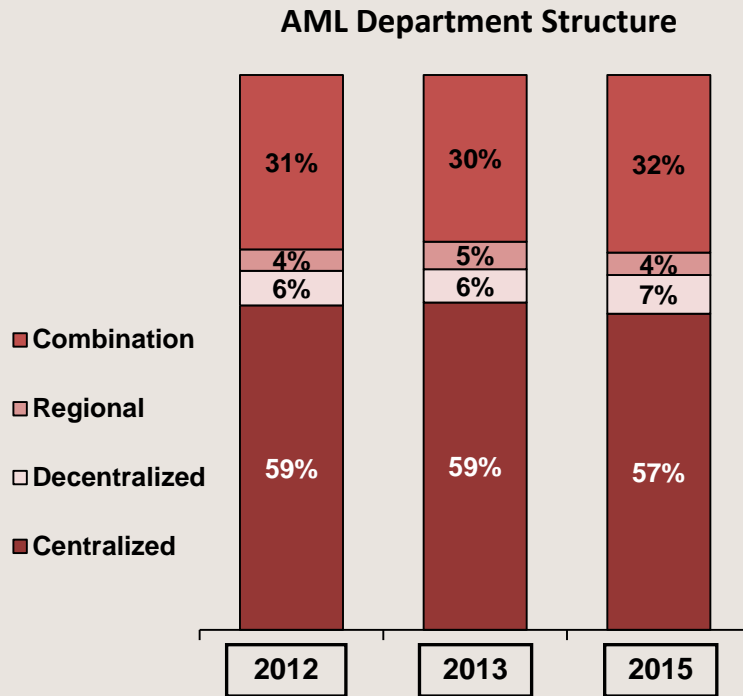
Legend: ■ 2015 ■ 2013 ■ 2012

1. Which of the following describe the organization you personally work in? Select all that apply.
Base: Total: 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)

Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

AML Department Structure & Staffing

More than half of respondents report their AML departments are centralized and another one-third have a combination of structures. 60% report their organizations increased AML staff levels in the past year, continuing the increase in staffing growth rates since 2012.

AML Department Structure

	2012	2013	2015
Combination	31%	30%	32%
Regional	4%	5%	4%
Decentralized	6%	6%	7%
Centralized	59%	59%	57%

Change in AML Staffing in Past Year

|	2012	2013	2015
Increased	48%	52%	60% ⬆
Remained the same	44%	39%	33% ⬇
Decreased	7%	9%	7%

12. How is your organization's AML department structured? Base: 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)
13. In the past 12 months, has your organization increased, decreased or kept the same number of people working on AML compliance at all locations worldwide?
Base: Total answering: 2012 (n=1,189); 2013 (n=928); 2015 (n=1,073)

Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

AML Job Functions

Nearly 80% of respondents have AML-related job functions. Many also identify working in regulatory/policy compliance, KYC and Compliance Operations. The proportion involved with sanctions is higher in 2015.
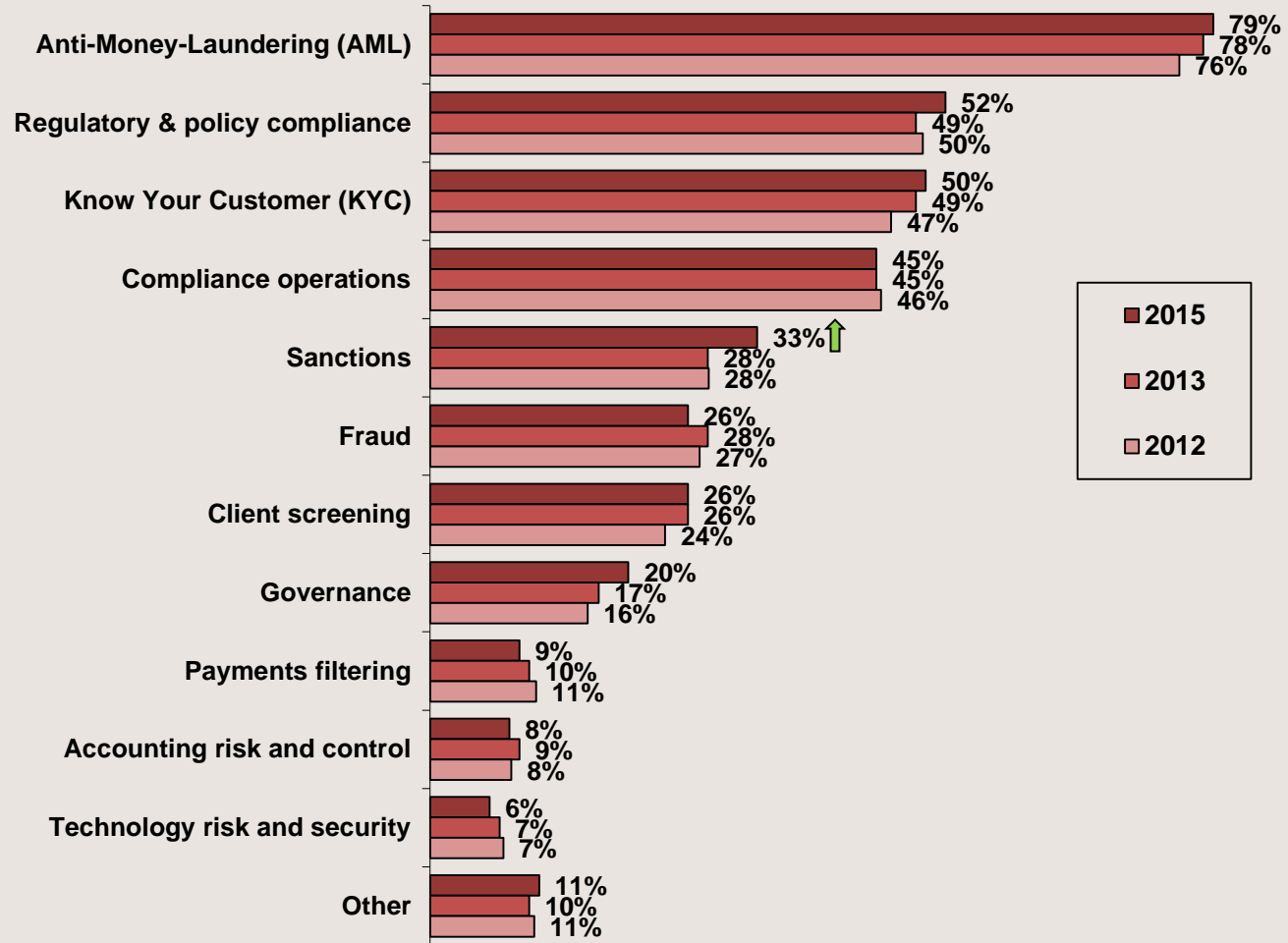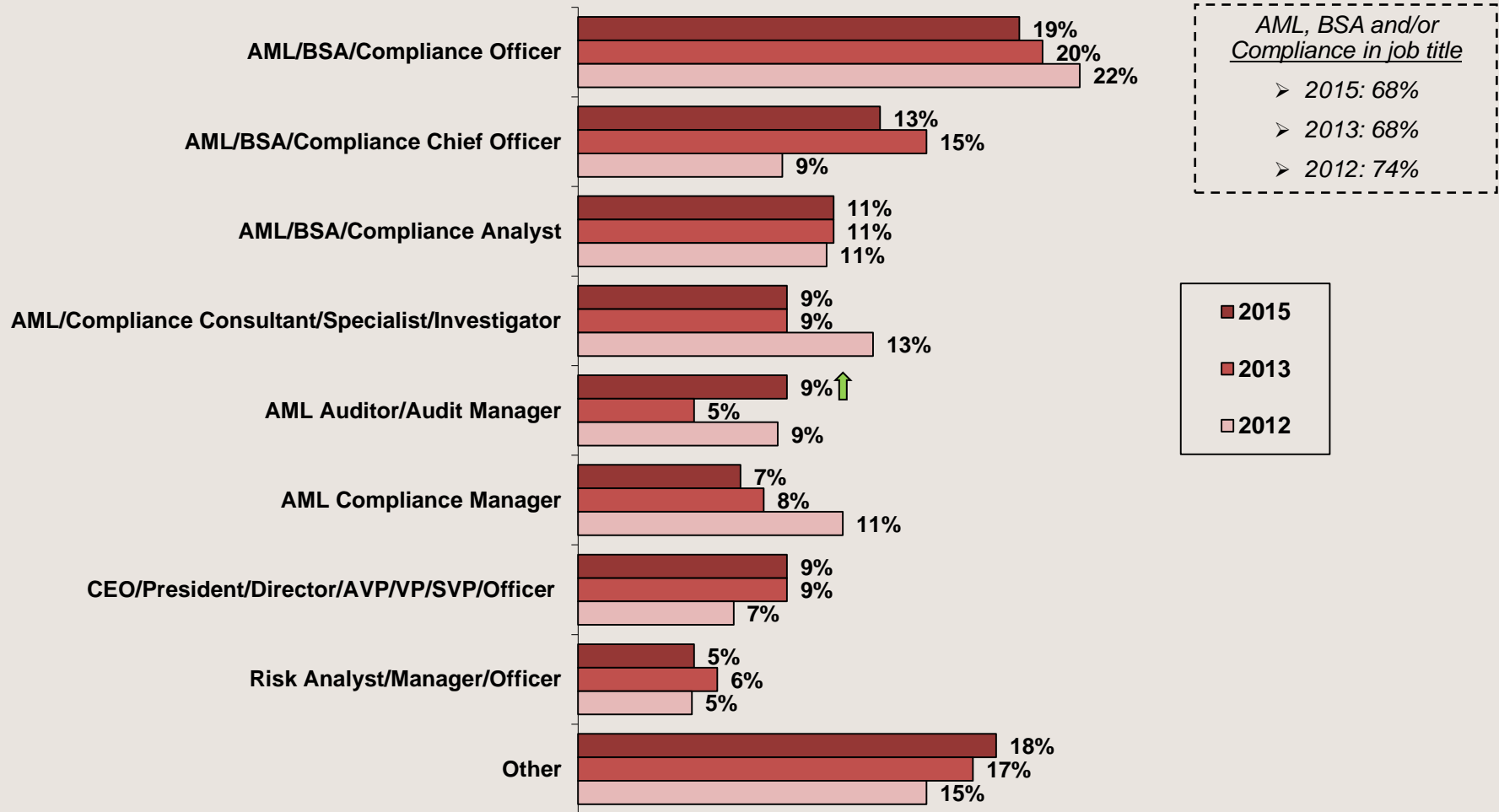

2. What are your main functions?
Base: Total: 2012 (n=1,275); 2013 (n=989); 2015 (n=1,118)

Green and **Red** arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES

Job Titles

Two-thirds of respondents have job titles specifying AML, BSA and/or Compliance responsibilities.

AML/BSA/Compliance Officer
- 19%
- 20%
- 22%

AML/BSA/Compliance Chief Officer
- 13%
- 15%
- 9%

AML/BSA/Compliance Analyst
- 11%
- 11%
- 11%

AML/Compliance Consultant/Specialist/Investigator
- 9%
- 9%
- 13%

AML Auditor/Audit Manager
- 9%
- 5%
- 9%

AML Compliance Manager
- 7%
- 8%
- 11%

CEO/President/Director/AVP/VP/SVP/Officer
- 9%
- 9%
- 7%

Risk Analyst/Manager/Officer
- 5%
- 6%
- 5%

Other
- 18%
- 17%
- 15%

AML, BSA and/or Compliance in job title
- ➢ *2015: 68%*
- ➢ *2013: 68%*
- ➢ *2012: 74%*

■ 2015
■ 2013
□ 2012

59. What is your job title? (write in)
Base: Total answering: 2012 (n=1,266); 2013 (n=979); 2015 (n=1,117)

Green and Red arrows indicate statistically significant difference between 2013 and 2015 at 95% confidence

DOW JONES