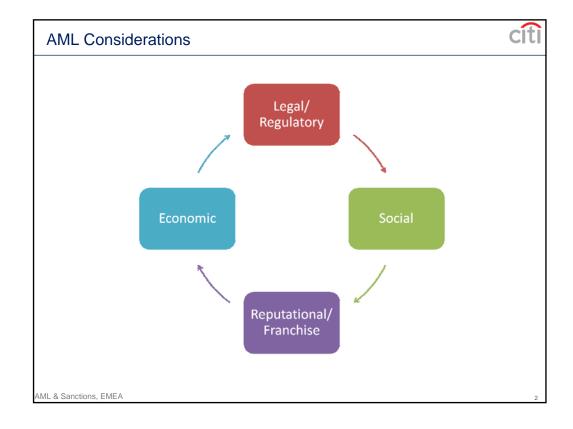
Vienna, 6-7 February 2012

Session VI: Triangulating Co-operation between Public, Private and International Organizations

ENGLISH only





Citi's AML Program



- Assessing Risk, Calculating Typologies and Creating Controls
- Constantly Reassessing Program Effectiveness
- Building a "Culture of Compliance"
- AML Lifecycle:

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Prevention Detection Reporting

The AML Ecosystem

Audit

Board level focus

Top level Committees

Management
Oversight
Client engagement

Policies & Procedures

Risk Assessment

Risk Assessment

Know Your Customer

AML Product
Risk Assessments

AML Product
Risk Assessments

AML Product
Risk Assessments

How does Citi improve the AML environment?



- Responsible finance
- Uncompromising internal AML/CFT and Anti-Bribery and Corruption standards
- Working together with key stakeholders
 - Supporting governments and regulatory authorities
 - · Hold training sessions, conferences, forums and seminars
- Insisting on robust standards with all partner banks
- Engaging in industry associations (national bank associations, Wolfsburg)

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Thank You!



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