

# **Anti Money Laundering: Upcoming Changes**



- The rules and regulations of the German Regulator and BaFin as AML/CTF supervisor including the best industry practice
- AML Risk Management, Monitoring and Reporting
- Know Your Customer and Customer Due Diligence standards
- Specifics of German AML regulations: Interpretation and application
- Incl. new EU AML/CTF Regulations published in May/June 2024



#### Speakers



Tassilo W. Amtage Director | Lawyer Ernst & Young Law GmbH Frankfurt/Main



Jan-Eric Dippel
Manager, Audit and Assurance,
Financial Services AML/Compliance,
BDO Wirtschaftsprüfungsgesellschaft AG, Frankfurt/Main

# **Anti Money Laundering: Upcoming Changes**

# Program

## The Regulatory Universe

- German Criminal Code (StGB), extended predicate offences (all crimes approach)
- German AML Act
- BaFin Interpretation and Application Guidance (AuA) and additional modules, General Part and Special Part
- Impact of the Geman Sanctions Enforcement Acts (Dec. 2022) on AML/CTF

## AML Risk Management

- Risk Management basics
  - Strategy and risk appetite
  - Risk management process
  - Three Lines of Defense Model
- AMI Risk Assessment
  - Supranational Risk Assessment
  - National and Sub-National Risk Assessment (NRA and SNRA)
  - Enterprise-Wide Risk Assessment: process, methodologies, structure, format and report, typical pitfalls

## The Role of the AML Officer or MLRO

- Appointment
- Scope of tasks and possible conflicts of interest (segregation of duties)
- Job description
- Suspicious activity report
- Liability risks

# Risk Responses and Mitigation

- Internal policies, procedures and controls
- Monitoring plan
- Monitoring activities

#### **Data Protection**

- Disclosure of information, retention and deletion obligations
- Re-use of identification data

## Ultimate Beneficial Owner (UBO)

- Clarification of UBO
- Thresholds, registers
- Fictitious UBO
- Transparency Register (access, reporting inconsistencies etc.)
- European Transparency Register and German interim solution

#### Other

- Outlook on possible consequences and expected changes due to the new EU AML/CTF regulations published in May/June 2024
- Typical questions asked by regulators, checklists, templates
- Shortfalls and deficits re AML/CTF discovered particularly frequently by BaFin
- Differentiation between the prevention of terrorist financing and the prevention of breaches of financial sanctions

Visiting this seminar will enable you to fulfill your annual training obligations. You will be provided with a certificate that you can share with your year-end auditor. Both speakers are experienced and have worked in this field for many years.

# Aims and Objectives

One key focus lies on implementation problems of the GWG as well as the amendments to the BaFin's special implementation guidance for the banking industry. The prospective deletion of the catalogue of precautions in § 261 StGB also has a significant impact on the risk analysis as new risk constellations may arise. The interplay of European and national supervision of the financial market will also be worth an in-depth look as uniform requirements on an EU-level open up opportunities for cross-border standards.

Attending this seminar will allow you to gain a deeper understanding of:

- the AML/CTF requirements you have to comply with.
- your responsibilities when preparing a risk analysis.
- how to interact with the FIU when filing SARs/STRs and BaFin.
- how to avoid the pitfalls of the Transparency Register, UBOs and PEPs as well as your training, supervisory and controlling duties.

We are not only focusing on the existing requirements, but will also share with you our thoughts and ideas regarding the upcoming and expected new rules and obligations. Those changes may even have an impact on your organizational set-up and your processes. Please be assured that new regulatory changes will be taken into consideration as well.

## Who Should Attend?

MLROs/Money Laundering Officers, their deputies and members of their staff in both banks and financial institutions as well as other so-called »obliged parties« such as insurance companies, traders of goods and law firms. Moreover, employees of legal, compliance, auditing, payments and finance departments as well as lawyers, notaries, WPs, tax advisors will be able to benefit from this seminar. It is, however, not suitable for complete newcomers.

Some previous practical experience would be highly beneficial as the seminar will focus on the current new regulations and their implementation.

# **Our Speakers**



Tassilo W. Amtage
Director | Lawyer, Ernst & Young Law GmbH
Frankfurt/Main

Tassilo Amtage is a German-qualified lawyer with EY Law in Frankfurt. He has over 20 years experience working in large European banks implementing measures to comply with rules and group policies on financial crime compliance (anti-money laundering, counter terrorism finance, economic sanctions, fraud prevention, anti-corruption). He is also a frequent lecturer for multiple institutions and internationally recognized compliance certification programs and regularly contributes to leading legal publications, such as the Zentes/Glaab Frankfurter Kommentar zum GwG.



Jan-Eric Dippel
Diplom-Jurist/Master of Laws (LL.M.)
Manager, Audit and Assurance, Financial Services AML/Compliance
BDO Wirtschaftsprüfungsgesellschaft AG, Frankfurt/Main

Jan-Eric Dippel is a German Legal Graduate (Diplom-Jurist) and Master of Laws and has more than 8 years experience in banking, regulatory and AML matters. As manager at BDO, he is responsible for auditing and managing external, internal as well as regulatory special and focus audits in the fields of AML, Fraud and Compliance with relations to digital technologies like Blockchain, Al and Crypto Custody. As Head of the Digital Asset Compliance Solution, Jan is a digital native with high experience in Financial Services.

Jan started working for Deka Bank in 2016 and worked in the Capital Markets Area at BNP Paribas and State Street before joining KPMG in 2019. From 2021 to 2022 he worked at EY's EMEA Financial Services Audit practice, before joining BDO. He also advises clients in projects related to topics of transactions, payments settlement and risk analysis according

#### Scope

This seminar covers the duties of the MLRO, including the organizational set-up, their controlling and reporting requirements, the preparation of the risk analysis and SAR /STR filing, transaction monitoring etc. as 2nd LoD as well as the duties to be performed by the 1st LoD, which include KYC and Customer Due Diligence Standards (CDD). We will also address guestions concerning the AML regulatory standards relevant to financial institutions under BaFin supervision, including the AML Act (GwG), the Banking Act (KWG) and the BaFin Interpretive Notes General Part dd October 2021 and Special Part dd. June 2021. Another focus will be on the Transparency Register, Bundesbank's expectation re Sanctions vs. BaFin's expectations re terrorism financing, the consequences of the all crime approach in Section 261 German Penal Code and the impact of the EBA AML/CTF related Guidelines and Bafin's expectations and the deficits detected by BaFin.

#### Your Benefits at a Glance

- Up-to-date information: hands-on approach
- Current new regulations and focal points from practice
- Including »all-crime approach« of § 261 StGB
- Highly experienced speakers
- Qualifying certificate

## **Further Information**

I am happy to answer your questions about this seminar, in-house trainings and our entire program.



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# **Registration Form**

Date/signature

Anti Money Laundering: Upcoming Changes

Surname		
First name		
Position/Department		
Company		
Street		
Postal code / Town		
Phone/Fax		
Email		
Name of assistant		

Please send your registration to: anmeldung@akademie-heidelberg.de

#### Date and Time

Tuesday, 24 June 2025 9:30 am to 5:00 pm Online access from 9:15 am Seminar code: 25 06 BG680 W

#### Fee

€ 890,- (plus VAT)

The fee includes access to the seminar as well as the presentation as a PDF file.

After the seminar, you will receive a certificate confirming your attendance.

#### General Terms and Conditions

Our general terms and conditions apply (as of 01.01.2010). If you wish, we can send these to you. An English version is available upon request.

You can also view our general terms and conditions at any time on our website: www.akademie-heidelberg.de/agb

#### Procedure

- One day prior to the seminar you will receive an email with a link giving you direct access to the online seminar.
- In order to participate, you do not need to download and install any program.
   You can dial in directly via Zoom using your internet browser.
- You can ask questions at any time and discuss them with the speakers and other participants via your microphone and camera. Alternatively, you can use the chat to communicate.



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