

9 REGULATIONS

That Are Easier to Meet with Argos Risk

IS BANK COMPLIANCE STACKED AGAINST YOU?

1 BANK SECRECY ACT

- Provides a secondary check on Political Exposed Persons (PEP)
- Provides a secondary check for Money Service Businesses (MSBs) to prevent money laundering

2 TITLE III OF THE USA PATRIOT ACT

- Checks to ensure no entity is on the OFAC SDN list
- Checks for MSBs

3 SECTION 326 OF THE USA PATRIOT ACT REQUIRING CIP PROGRAM

- Assists you with KYC and KYCC
- Can determine a customer's risk in terms of propensity to commit money laundering, terrorist finance, or identity theft
- Assists in creating an expectation of a customer's transactional behavior
- Monitors customer's transactions against expected behavior and peers

4 OCC BULLETIN 2006-39 & 2008-12

- Monitors and profiles Third-Party Senders and the companies they originate for as part of Know your Customer's Customer
- Provides documentation to support adequate procedures for conducting due diligence, underwriting, and ongoing monitoring of third-party relationships

5 FDIC FINANCIAL INSTITUTION LETTER (FIL)- 41-2014

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6 NACHA OPERATING RULES

- Provides ODFIs with a commercially reasonable method to verify the identity of the Originator or Third-Party Sender (Article II Section 2.2.1)
- Provides ODFIs with due diligence with respect to the Originator or Third-Party Sender in order to form a reasonable belief that they have the capacity to conform with NACHA Operating Rules (Article II Section 2.2.3)
- Monitors ACH transaction and return data, allowing you to know the return rates for your originator by percentage (Article II Section 2.17.2)
- Assists on compliance with Appendix 8 for audits, by helping you monitor your originators, transactions over time and return rates
- Provides Third-Party Sender management by monitoring the third-party senders, with an option to monitor their originators. Know who you are originating for and Know Your Customer's Customer (Article II Sections 2.2.1 and 2.2.3)

7 FDIC44-2008

- Provides monitoring for downstream third-party relationships, providing compliance with the FDIC mandate for identifying and monitoring third-party risk

8 FINCEN SECTION 314(a)

- Provides FIs and companies with the needed information to comply with law enforcement requests related to anti-money laundering activities

9 FFIEC EXAMINERS HANDBOOK

- Provides credit risk monitoring for RDC customers to address the FFIEC guidance "requirement" regarding credit risk monitoring for RDC customers

