

RISK INDICATORS

FOR AML/CFT AND THIRD-PARTY DUE DILIGENCE

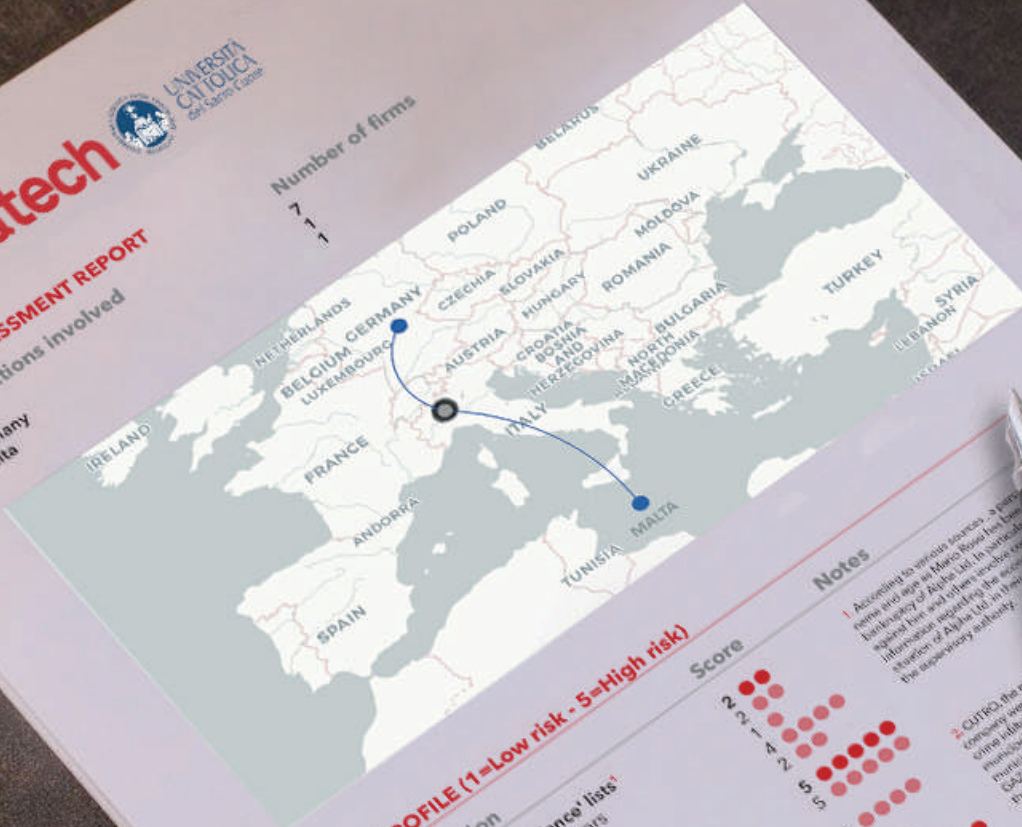
www.crimetech.it



crim&tech

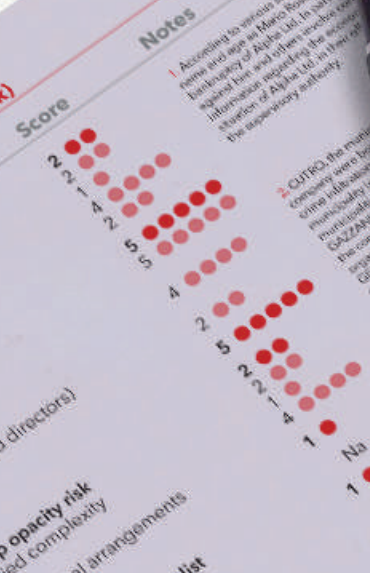
RISK ASSESSMENT REPORT

Jurisdictions involved  
Italy  
Germany  
Malta



RISK PROFILE (1=Low risk - 5=High risk)

- A) Presence in 'compliance' lists\***
  - PEP/Local administrators
  - Sanctions
  - Enforcement
  - Adverse Media
- B) Territorial risk:**
  - Municipality risk (firm)
  - Municipality risk (shareholders and directors)
  - Country risk
- C) Sector risk**
- D) Ownership opacity risk**
  - Unjustified complexity
  - Secrecy
  - Links with legal arrangements



Notes

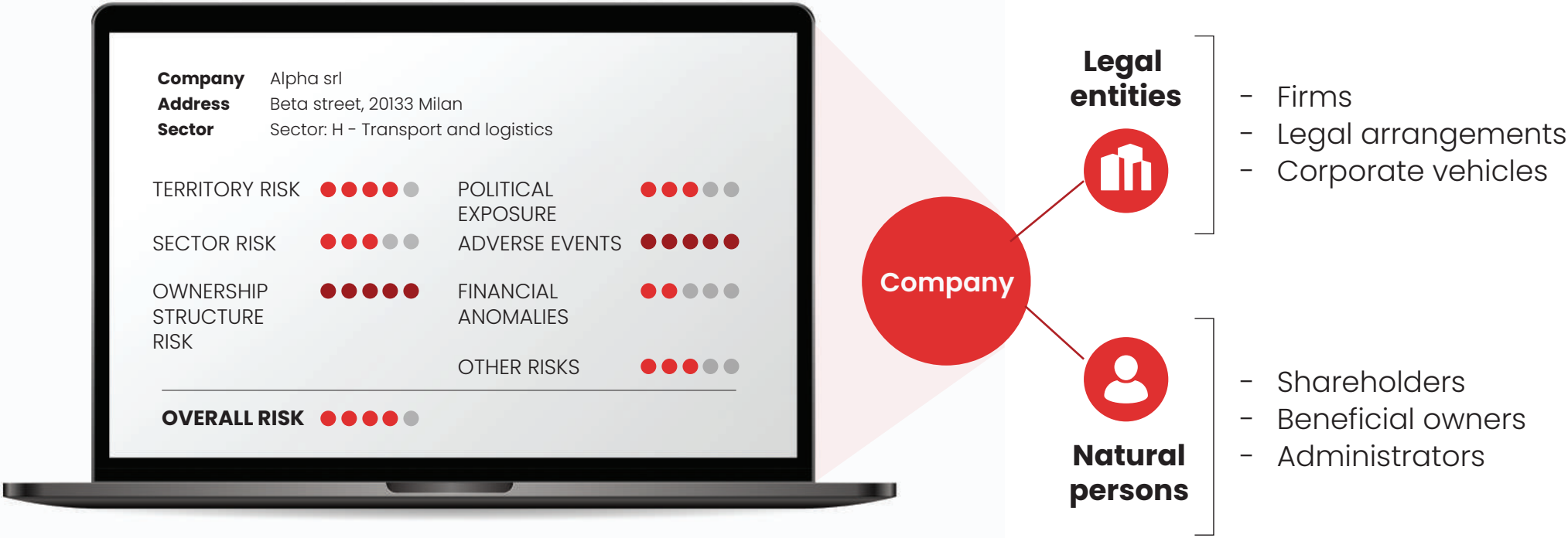
1. According to various sources, the company is active in the territory of Agropoli. In the absence of information regarding the company's status of activity in the territory, the supervisory authority...
2. CUFID, the monitoring company, has been identified in the company's financial statements (BALANCE SHEET) as the company's sole shareholder. The company is registered in the Chamber of Commerce of Palermo.

# Crime&tech Risk indicators

Crime&tech offers the widest global portfolio of risk indicators for AML/CFT and third-party screening.

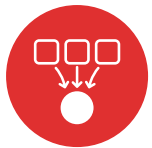
The risk indicators are based on models developed in our research projects.

They can be associated to **legal entities** (companies, corporate vehicles) and the **individuals** linked to them (shareholders, beneficial owners, administrators)



# Crime&tech risk indicators

They allow to:



**Incorporate the risk-based approach** promoted by anti-money laundering (AML) and anti-corruption regulations



**Move beyond traditional risk assessment approaches** based solely on the check of 'compliance lists'



**Cover firms at a global level** (220+ countries, 400M+ firms), allowing to tackle the transnational nature of organised and financial crimes



**Cover different risk dimensions**, such as territorial risk, sector risk, ownership structure risk, financial and accounting anomalies, and other risk factors



**Focus not only on "who"** controls a firm, **but also on "how"** control takes place - the operational context, the whole corporate structure and its links



**Reduce the information over-load** by condensing high volumes of data into synthetic risk scores

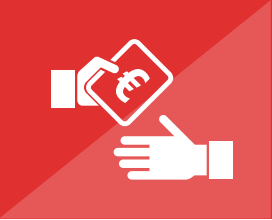


# End users and use-cases

Crime&tech indicators can be used by different players for many purposes:



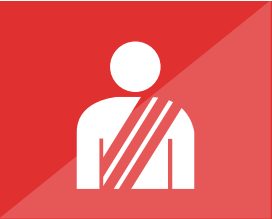
**Obligated entities**  
for AML/CFT due diligence



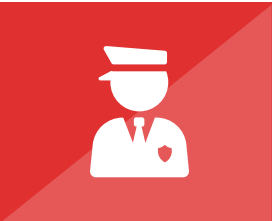
**Anticorruption agencies**  
for public procurement integrity checks



**Private companies** for on-boarding, reputational due diligence and on-going monitoring of counterparts



**Competition authorities**  
for cartel detection and procurement fraud investigations



**Law enforcement agencies** for organized crime, money laundering, corruption and tax fraud investigations



**Supervision authorities**  
for risk assessment and monitoring of geographic areas and business sectors at high risk

# Our portfolio of risk indicators

More than 20 different indicators, constantly evolving, and including among others:



## Ownership structure

- Anomalous complexity of ownership structure
- Ties to opaque corporate vehicles and legal arrangements
- Lack of information on beneficial ownership
- Anomalous shareholding patterns
- Anomalous frequency of board rotations



## Territory & Sector

- Firms in municipalities with high mafia risk
- Partners, BOs, or directors from municipalities with high mafia risk
- Links with high-risk countries (*several specifications*)
- High-risk economic sectors



## Other risk factors

- Anomalous characteristics and background of BO/directors
- Anomalous frequency of name and address changes
- Anomalous date of incorporation
- High-risk legal forms (*country specific*)



## Political exposure

- Shareholders, Beneficial Owners or Directors
  - Politically Exposed Persons
  - Local Administrators (in several EU countries)



## Negative events

- Enforcement events
- Adverse media
- Sanctions
- Sanctioned professionals
- Mentions in Offshore Leaks (e.g. Panama Papers, etc)



## Financial anomalies

- Shell company indicators
- Anomalies in the income statement
- Anomalies in the balance sheet
- Anomalies in cash flow

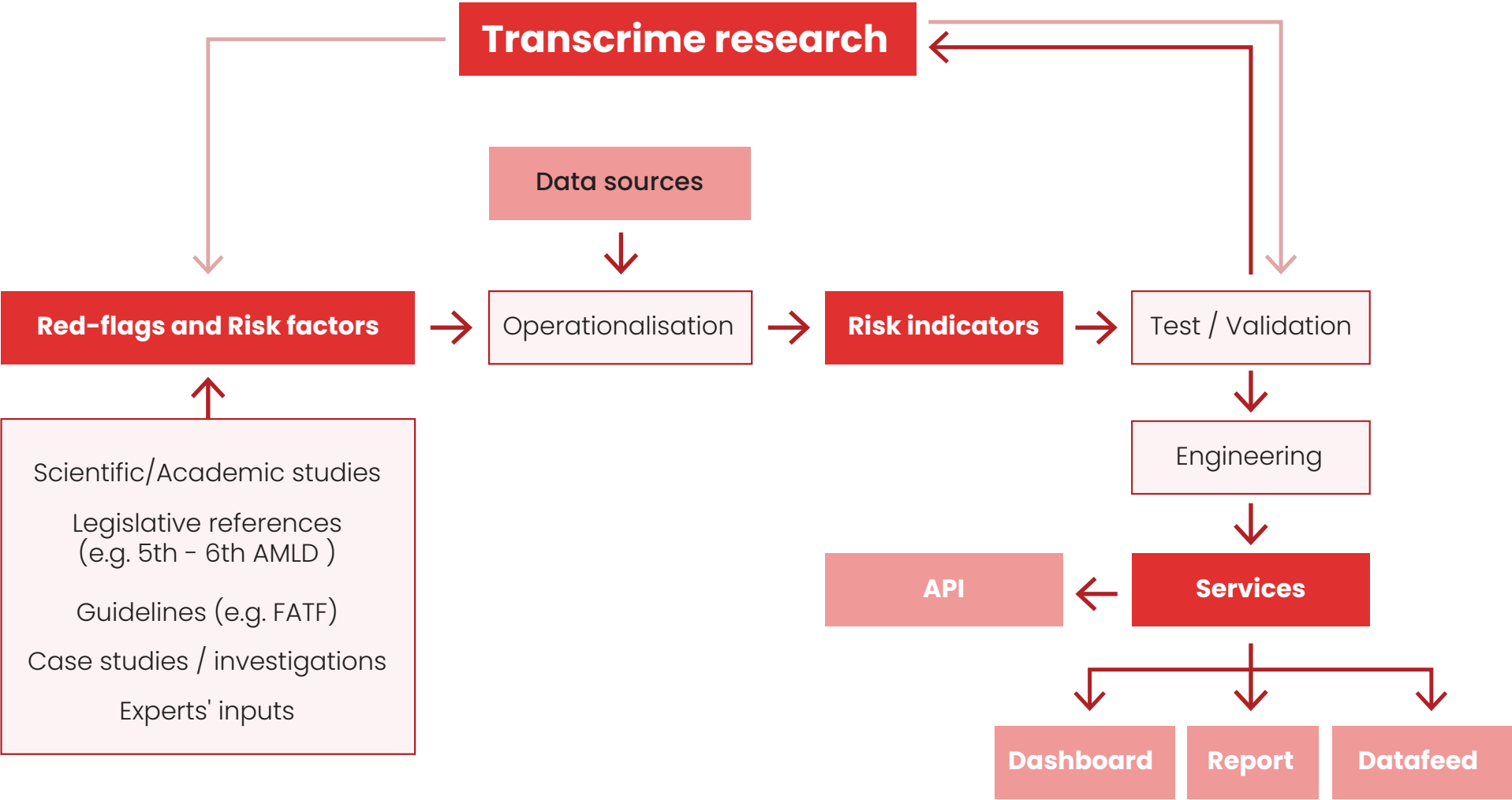


## Countermeasures

- Anti-mafia white lists
- AGCM Rating
- Certifications (e.g. SOA)

# Process and methodology

The indicators are developed using frontier analytical approaches, and following the research activities carried out by Transcrime and Crime&tech in previous research projects.



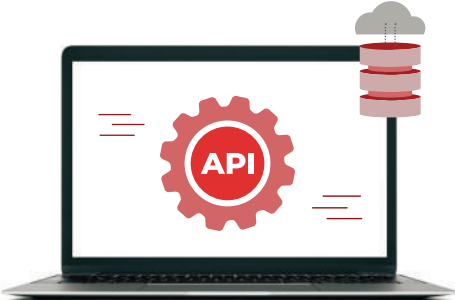
# Delivery channels

Crime&tech indicators can be accessed through **four delivery channels**:

1

**Webservices**

through API connections to customer applications



2

**Customised platforms**

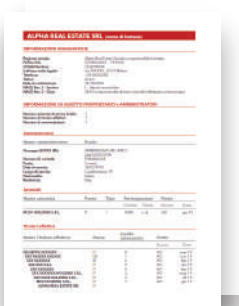
RISK MASTER  
RISK VISIONER



3

**Customised reports**

on companies and/or individuals



4

**Datafeed**

Through integration of flat files the customer can integrate into its applications



# Scientific validation

The indicators are validated in their predictive power in several international scientific publications.

Crime&tech risk indicators have shown strong predictive power in identifying firms (and owners / directors) later affected by sanctions and judicial measures. In a test conducted on a sample of 13.4M million of firms and owners, **ownership risk indicators** correctly predict **82.6%** of firms affected by sanctions and **88%** of firms with partners affected by judicial measures.

Discover the selected list of publications on the TOM webpage

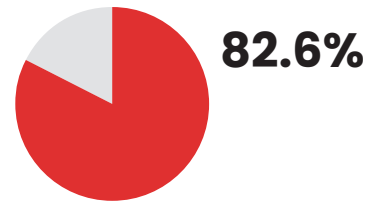


## TOM – The Ownership Monitor

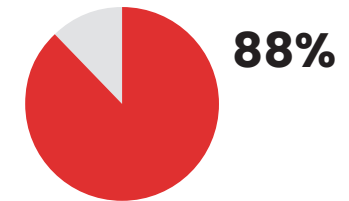
is an excellence R&D hub launched by Transcrime and Crime&tech, for the analysis of business ownership structures.

Discover more:

<https://www.transcrime.it/en/tom-the-ownership-monitor/>



Correct prediction of firms affected by sanctions



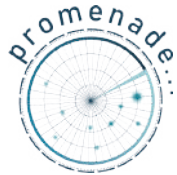
Correct prediction of firms with partners affected by judicial measures

|                          | True Positive Rate | True Negative Rate | Overall Accuracy | AUC   | Precision |
|--------------------------|--------------------|--------------------|------------------|-------|-----------|
| SANCTIONS ON COMPANIES   | 82.6%              | 83.5%              | 83.1%            | 0.904 | 0.834     |
| ENFORCEMENT ON COMPANIES | 65.2%              | 76.4%              | 70.8%            | 0.785 | 0.734     |
| SANCTIONS ON OWNERS      | 88.7%              | 84.7%              | 86.7%            | 0.921 | 0.923     |
| ENFORCEMENT ON OWNERS    | 87.8%              | 92.7%              | 90.3%            | 0.921 | 0.923     |



# Institutional validation

Crime&tech risk indicators have been developed and validated within international research projects involving numerous public authorities at international level and private companies



| Law Enforcement Agencies   | Anti-Corruption Authorities  | Competition and Market Authority and other Public Authorities  | Private enterprises and civil society  |
|--|--|--|--|
| <p>Europol</p> <p>Anti-Mafia Investigative Directorate</p> <p>Guardia di Finanza</p> <p>CNP – Cuerpo Nacional de Policía, Spain</p> <p>BFP – Belgian Federal Police, Belgium</p> <p>DCPJ – Direction Centrale de la Police Judiciaire, France</p> <p>ANABI – Romania</p> <p><i>...and others</i></p> | <p>ANAC – National Anti-Corruption Authority, Italy</p> <p>AFA – Agence française anticorruption, France</p> <p>OPLC – Prevention and Fight against Corruption Office of the Balearic Islands, Spain</p> <p>ANI, Romania</p> <p>DNA, Romania</p> <p>NCPA – Network of Corruption Prevention Authorities of the Council of Europe (GRECO)</p> <p><i>...and others</i></p> | <p>ADLC – Autorité de la Concurrence, France</p> <p>CCRL – Competition Council of the Republic of Lithuania, Lithuania</p> <p>UOHS – Urad pro Ochranu Hospodarske Souteze, Czech Republic</p> <p>National Anti-Mafia Directorate</p> <p>Lombardy Region</p> <p>ORGA – Agency for the management of confiscated property, Spain</p> <p><i>...and others</i></p> | <p>Banks and AML obligated entities</p> <p>Companies in various fields (e.g. energy, IT) for supplier and third party control</p> <p>Organisations of investigative journalists (e.g. OCCRP, IRPI, RISE)</p> <p><i>...and others</i></p> |

# Data sources

Transcrime and Crime&tech possess in-depth knowledge of key data sources used in compliance/due diligence. Crime&tech indicators are calculated exploiting the following data sources (among others):

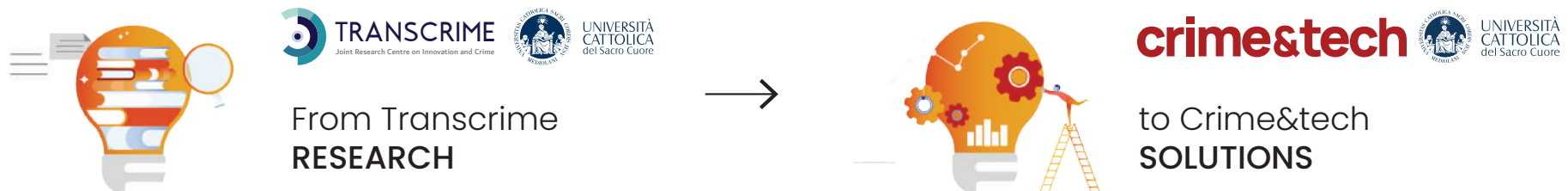
| Corporate data | Compliance lists and negative events | PEP and Local Administrators | Other sources (among others) |
|----------------|--------------------------------------|------------------------------|------------------------------|
|                |                                      |                              |                              |

# Transcrime

- Joint Research Centre on Innovation and Crime ([www.transcrime.it](http://www.transcrime.it)) of the Università Cattolica del Sacro Cuore
- Largest crime research hub in Europe
- Established in 1994
- 200+ research projects funded nationally and internationally
- Focus: organised crime, money laundering, financial crime
- Established network among European Law Enforcement, FIUs, Anti-corruption Authorities
- Approach: sociology, statistics, economics, forensic accounting, law, IT

## Crime&tech

- Spin-off company of Transcrime – Università Cattolica del Sacro Cuore ([www.crimetech.it](http://www.crimetech.it))
- Risk models, risk indicators, IT applications for the assessment and prevention of criminal risks
- Processing of multiple data sources (official stats, judicial files, open sources, company data)
- Frontier AI approach (machine learning, text-mining, big data scraping)
- Certified ISO/IEC 27001:2013
- Partner of solution providers and data providers



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ISO/IEC 27001:2013 certified

