Te Pūtea Matua
Tane Mahuta, Our sound and efficient financial system

Te Pekenga
Branches & Leaves
Our regulated entities, banks, insurers, and non-bank deposit takers

Te Toto
The Sap
Our money
Our foreign reserves

Te Tariwai
Vascular
Our payment and settlement systems

Nga Pūtakē
The Roots
Our legislation, our balance sheet and equity
Welcome to the Reserve Bank of New Zealand AML/CFT Workshop

7th October 2019
Cable Room, Harbourside Function Venue, Wellington, New Zealand
Agenda

- Introduction & Health and Safety
- Follow up to ‘Evolution in Enforcement’
- Risk Assessment Model & Supervision Manual
- Group discussion session and feedback
- A few items of guidance clarification

Afternoon Tea - approximately 2:30pm

- Update on Mutual Evaluation 2020
- Consultation on the Expiring Regulations
- Open questions
- Closing comments (4:00pm)
Follow Up to ‘Evolution in Enforcement’
Evolution in Enforcement – Follow Up

• Overall, feedback has been positive following the outreach.
• Requests have come through for more examples of a material breach and minor breach.
• Naturally it is difficult to provide numerous examples, as each finding will be considered in light of;
  – the impact/severity of the issue
  – any other findings (findings will be consider as part of a whole, not individually)
Evolution in Enforcement – Follow Up

**Material Breaches:** The reporting entity has failed to meet the requirements of the AML/CFT Act and the implications of the failure are considered to be material from an outcome perspective. *This will be referred to RBNZ’s Enforcement team, who will conduct an independent investigation of the material breach.*

**Minor Breaches:** The reporting entity has failed to meet the requirements of the AML/CFT Act but the implications of the failure are considered less than material from an outcome perspective. *This may be referred to RBNZ’s Enforcement team.* Remedial action will be required to achieve on-going compliance.
Evolution in Enforcement – Follow Up

**Deficiencies:** Aspects of the reporting entity’s compliance with AML/CFT requirements that are considered inadequate by the supervisor. *This may be referred to RBNZ’s Enforcement team.* Remedial action will be required to achieve on-going compliance.

**Recommendations:** RBNZ considers it good practice. These recommendations do not require action to be taken but it is advised. These are usually procedural type updates, enhancements or amendments to documentation. Recommendations will usually not require system changes.
Evolution in Enforcement – Follow Up

Some further examples of a potential material breach:

• A reporting entity has failed to report a significant number of PTRs within the required timeframe.

• Following a review or audit of a reporting entity’s Risk Assessment or AML/CFT Programme, a reporting entity has failed to make the necessary changes.

• A reporting entity has adequate documented policies and procedures, however these are materially ineffective in practice.

Some further examples of a potential minor breach:

• A reporting entity has failed to report a minor number of PTRs within the required timeframe. The reporting entity has taken prompt action to remediate and report the PTR after the issue was identified.

• A reporting entity has failed to obtain senior management approval for a small number of customers that are PEPs.
Q&A

For minor breaches and deficiencies, what will determine whether it is referred to the enforcement team or not?

The decision whether or not to refer to our enforcement function will be made on a case by case basis, and will take into consideration factors including whether the findings are:

• Material
• Systemic
• Represent an emerging pattern of non compliance
• As well as the willingness and ability to remediate
Q&A

Will the RE have the opportunity to discuss/challenge/review the decision to refer to enforcement function with the RBNZ before it happens?

We operate under a no surprises approach. What we discuss in the closing meeting of an on-site will likely be what ends up in the final report. The RE will have time following the onsite to provide additional documentation which may impact on the decision, but ultimately the decision to refer to the enforcement function is the decision of the AML/CFT Supervision team.
Q&A

With regards to the remedial action, does that mean the RBNZ will come back to do a further inspection or will the RE have to undertake the work and provide updates to the RBNZ?

The action taken following the onsite will depend on the specific findings identified, however both a follow up onsite visit and requiring written updates from the RE are possible outcomes.
Q&A

Is there then an expectation that the RE will implement recommendations? If the RBNZ comes back in 2 years to do another inspection and the recommendations haven’t been implemented, will action be taken, could the recommendations be upgraded to a deficiency?

Short answer, no. Recommendations are provided to assist reporting entities strengthen their AML/CFT programme or risk assessment. These are usually procedural type updates, enhancements or amendments to documentation. Recommendations will usually not require system changes.

That being said, a complete disregard of easily implemented recommendations will speak to the AML/CFT culture and attitude of an RE.
Q&A

Is there an expectation that REs will have read and understood the formal warnings issued to others and have considered/reviewed/incorporated changes into their AML programmes as a result?

Yes. The Evolution in Enforcement presentation should also be considered a second warning in relation to these issues previously raised in the formal warnings.

In future, the RBNZ will proactively communicate any action taken against a Reporting Entity to all AML/CFT Compliance Officers.
Q&A

Is there an expectation that residual risk is assessed in the risk assessment? The statement says “You may choose to include” but is it expected?

No. It is expected that inherent risk (risk without controls) is assessed. Residual risk can be assessed in the risk assessment, but this is at the discretion of the RE.
The key focus of the Evolution in Enforcement seems to be on Risk Assessments. Is that where the enforcement action is likely to be targeted?

The risk assessment is an area of focus for the RBNZ, as it forms the foundation of your AML/CFT programme. Failure to meet your obligations under section 58 will be met with action from the RBNZ, and a referral to our enforcement function. Repeat failings from previous inspections or material breaches in other areas may also be referred to the enforcement function.
If the RBNZ found a deficiency one year, will that deficiency become a breach if not addressed?

Short answer, yes. Although it depends on the severity of the deficiency. Failure to take action required by the supervisor will have negative consequences.
Are the other supervisors taking a similar approach?

We cannot comment on behalf of the other supervisors, however we discussed this presentation in advance with the DIA and the FMA, as well as with the Police Financial Intelligence Unit. They are supportive of our message. Both the DIA and the FMA have taken enforcement action against entities they supervise.
Q&A

Can an RE have multiple risk assessments? For example, one for money laundering risk and one for terrorist financing risk?

Yes, that would be acceptable, as long as the documents are clearly labelled and accessible. It needs to be clear that all your risks have been assessed – the number of documents you decide to do this with is not a concern (although one document is considered good practice).
Referral to Enforcement

Referral to the Enforcement Function, who conduct an Independent Review

- AML/CFT Supervisors
- Conduct On-Site Visit, find Potential Breaches
- Write On-site Report
RBNZ Enforcement Function

Internal
- Formal Warning
- Enforceable Undertaking

External
- High Court Injunction
- Pecuniary Penalties
Section 57(1)(l); Monitoring and managing compliance
Between July 2014 & June 2019, **30 findings** directly related to monitoring and managing compliance in relation to section 57(1)(l).
Section 57(1)(l) – Common Issues

• Monitoring and managing compliance is not being conducted at all.
• It is not being conducted by the appropriate team/person/line of defence.
• Processes for monitoring and managing compliance are not documented.
• Monitoring and managing compliance processes are not fit for purpose i.e. are not discovering the gaps/issues they should be.
• Lack of lines of defence model has created key person risk with the organisation.
Comments we’ve made

- AML/CFT programme does not include information on activities that will be undertaken (e.g. testing) to monitor and manage compliance.

- In some instances, when an incident occurred on a particular date, there was a time lag between the date the incident occurred and the date it was identified by RE as part of its QA.

- The absence from the AML/CFT programme of a written description of the CDD oversight process does not provide assurance that effective oversight of CDD is maintained in practice. Overall, RBNZ considers that the RE’s assurance provisions in the AML/CFT programme are only partially adequate.

- RBNZ considers that the high level statements in the AML/CFT Programme do not articulate the processes and procedures that are currently operating in practice for assurance of CDD, TM, staff training, staff vetting and systems assurance. Overall, RBNZ considers RE’s assurance procedures and processes are not adequately documented.
Comments we’ve made

• RE’s AML/CFT Programme needs to be updated to ensure all assurance activities undertaken are documented. Further detail is required in terms of how the actual testing is performed and the scope of the testing.

• RE’s AML/CFT Programme requires updating to ensure all assurance activities undertaken are documented and provide sufficient detail as to how the testing is conducted. The scope of the testing must also include obligations that may occur on a rare basis e.g. implementing a new product.

• AMLCO is knowledgeable with regard to the AMLCFT programme and systems RE uses to obtain, record and analyse its data but its documents do not adequately set out all the mechanics of how the programme is implemented, creating a key person risk.

• RBNZ requires RE to clearly define who is responsible for conducting CDD checking or assurance e.g. branch managers or another member within the ‘Risk’ team. RBNZ requires RE to ensure results from CDD checking or assurance activities are submitted to the AMLCO.
Minimum Requirements

• Have a documented program for monitoring and managing compliance, included in your AML/CFT programme.

• Have it documented who is responsible for conducting relevant monitoring activities.

• Have acceptable separation between those conducting the task, and those checking their work - It's not appropriate for this to be the same person.

• Monitoring activities needs to be comprehensive and cover all aspects of the AML/CFT programme.

• Record Keeping! You need to be able to provide RBNZ with evidence of monitoring and managing compliance.
Other Areas for Improvement
Other Areas for Improvement

Between July 2014 & June 2019:

227 findings were found in relation to the below areas;

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<tr>
<th>Area</th>
<th>Breach</th>
<th>Deficiency</th>
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<tr>
<td>Standard &amp; Simplified CDD (s11-21)</td>
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<td>ECDD (s22-30)</td>
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<td>40</td>
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<td>Account monitoring &amp; written findings (s31 &amp; s57(1)(g-h))</td>
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<td>Code of Practice (s67)</td>
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<td>34</td>
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<td>Suspicious Activity Reporting (s40-48)</td>
<td>3</td>
<td>19</td>
<td>22</td>
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<td>Review and audit of RA and Programme (s59)</td>
<td>3</td>
<td>10</td>
<td>13</td>
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</tbody>
</table>
Of the 227 findings...

19 Breaches and Deficiencies were identified in relation to verifying SOW/SOF.

- Verifying SOW/SOF needs to be undertaken using a risk based approach, but cannot be ignored. Clear guidance has been released on this previously. (See the joint supervisor ECDD guideline)

17 Breaches and Deficiencies were identified in relation to determining whether a customer should be subject to ECDD (s17(b)) & customer risk ratings.

- You must have a documented process for risk rating your customers. This will help you determine who your high risk customers are, and therefore when ECDD is required.
ECDD – Supervisors Expectations

Q: What should REs do for ECDD when they can’t meet the standards outlined in the ECDD Guideline?

A: The ECDD Guideline does not provide an exhaustive list of how to comply with all ECDD obligations under the AML/CFT Act. Therefore, a reporting entity can still meet it’s legislative obligations by not complying with every single standard outlined in the ECDD Guideline.
ECDD – Supervisors Expectations

Q: When do the Supervisors expect REs to exit a customer if the customer won’t co-operate? What if they refuse to provide further information about SOW/F?

A: Where a high risk customer has refused to provide information it is not appropriate to accept the risk having failed to obtain SOW/F. If you decide the information is required, then you must obtain it, or terminate the relationship.

It’s our view that a customer’s risk profile increases if they refuse to provide the information you require to meet your obligations.
ECDD – Supervisors Expectations

Q: In many instances there will be long-running internal records (such as transaction history), which could be helpful but don’t meet the Guideline. Are we able to rely on these?

A: We encourage you to determine what information/documents would satisfy your requirements in advance of contacting your customer.

Document your decision making. A risk based approach to ‘reasonable steps to verify’ could include historic transactional information, or an internet search, but the steps you take should be documented.
Of the 227 findings...

18 Breaches and Deficiencies were identified in relation to politically exposed person checks.

• You must “take reasonable steps to determine whether the customer or any beneficial owner is a politically exposed person”, you then need to show (and retain) evidence that you have completed this check.

23 Breaches and Deficiencies were identified in relation to obtaining Nature and Purpose.

• The nature and purpose for a customer is not often self explanatory; ask the customer why they want the product, and obtain an understanding of who they are (where do they work etc.). If you understand your customer, then you can determine when their activity is ‘out of the ordinary’.
RBNZ’s Reporting Entity Risk Assessment Model
Background

- AML/CFT is underpinned by a risk based approach.
  - Relevant to both reporting entities and supervisors.

- Shift for inherent to residual risk assessment of reporting entities.

- Qualitative and quantitative data from multiple sources.

- Residually higher ML/TF risk reporting entities will likely to be subject to greater/more frequent supervision.
Inherent Risk

• Sub-sector rating—High, Medium or Low
• Annual Report data:
  ➢ Gross value of transactions
  ➢ Gross volume of transactions
  ➢ Number of customers
  ➢ Number of customers that PEPs
  ➢ Number of trusts or other vehicles for holding personal assets
  ➢ Number of non-resident customers.
• Total assets under management
Capability Assessment

- Various capability descriptions – which one best describes.
- Four main areas:
  - People
  - Processes
  - Systems and Technology
  - Governance and Oversight
- Outcome – Capability Rating
  
  *e.g. Very Strong, Strong, Average, Weak or Very Weak.*
Culture Assessment

- Culture is an important component of a sustainable and effective AML/CFT programme.
  - Engagement
  - AML/CFT Compliance Officer
  - Senior management oversight
  - Attitude
  - Consequence management
  - Communications
  - Response to audit findings

- Outcome – Culture Rating
  
  e.g. Very Strong, Strong, Average, Weak or Very Weak.
Compliance Assessment

• Findings from on-site inspections
  ➢ Number of identified material breaches
  ➢ Number of identified minor breaches
  ➢ Number of deficiencies

• Adequacy of remediation/actions taken following an on-site inspection.
Prudential supervision

• Other supervision information or data that may be relevant for AML/CFT supervisory purposes *i.e.* banks, NBDTs or life insurers.

• Discussions with other RBNZ supervisors prior to on-site inspections.
Law enforcement information or data

- Suspicious activity/transaction reporting information.
  - Qualitative and quantitative data

- Asset Recovery Units – assets restrained/forfeited.
Other potential information or data

- Adverse media.
- Customer enquiries or complaints.
- Any relevant supervisory information from other international supervisors.
Overall ML/TF Risk Profile

- All reporting entities will be ranked.

- Ratings = High, Medium-High, Medium, Low-Medium and Low.

- Overall ML/TF risk profile will influence RBNZ’s AML/CFT supervisory programme.

- Reporting entities with a higher residual ML/TF risk profile will receive greater attention from RBNZ.
RBNZ AML/CFT Supervision Manual
Scope and Purpose

• The primary purpose of the Manual is to provide guidance to the reporting entities RBNZ supervises in order to assist those entities comply with their obligations under the AML/CFT Act 2009 and supporting regulations. In addition, the Manual will include other ‘good practice’ advice and examples that may enhance a reporting entity’s AML/CFT Risk Assessment and overall Programme.

• The Manual is not intended to be a ‘checklist’ for reporting entities.

• The secondary purpose of the Manual is to assist RBNZ’s AML/CFT supervisors when conducting an on-site inspection of a reporting entity and monitoring and assessing their level of compliance with the AML/CFT Act and supporting regulations.
Scope and Purpose

- The Manual may also be helpful to internal or external audit teams who conduct AML/CFT audits or businesses who provide AML/CFT consultancy services.

- The Manual provides guidance to reporting entities on the on-site inspection process. This includes information from the point a reporting entity is notified by RBNZ through to any potential enforcement action that may be taken due to findings from the on-site inspection.
Next steps and timeframes

• The Manual will be a public document and intend to publish on RBNZ’s website.

• Consultation and feedback from reporting entities prior to publication.

• First draft is expected to be completed by early 2020.
Group Discussion
Group discussion

The AML/CFT Act has been in force for over six years. During this time there has been a reasonable amount of turnover (across both the private and public sector) or ‘AML/CFT churn’ of people within AML/CFT roles. This is further compounded by a small pool of people with the necessary skills and experience.

The effectiveness of New Zealand’s AML/CFT system is heavily dependent on capability and capacity of people in AML/CFT roles.
Group discussion questions

1. What are the key recruitment challenges when attracting new people to a role/career in AML/CFT?

2. What skills and attributes (both technical and soft skills) should a strong AML/CFT practitioner have? (Both now and in the future)?

3. What actions/steps could be taken to help retain people in AML/CFT roles and reduce turnover?
Feedback from group discussion
Guidance Clarification
EV – Common Issues

• Electronic verification has two key components
  ➢ **Confirmation of identity information via an electronic source(s).**
  ➢ **Matching the person you are dealing with to the identity that they are claiming *i.e. are they the same person?***

• The ‘matching’ or ‘linking’ aspect continues to be the biggest pain point for the industry.

• Your process should be documented and show how the overall solution meets each specific criteria within the IVCOP (including any additional measures).

• We expect you to understand how your process fits the requirements – you will need to be able to explain this to us.
No Biometric Link

Matches a ‘Selfie’ to the photo on the ID document

Matches the Name & DOB to the Govt Database
No Biometric Link

Matches a ‘Selfie’ to the photo on the ID document

Does not match the ‘Selfie’ or Image to the Govt Database

Matches the Name & DOB to the Govt Database
No Biometric Link

To meet the standard advised in the IVCOP, additional measures would be required. Note: those additional measures must be both adequate and effective.
EV – Common Issues

• The Reserve Bank has required some reporting entities to remediate customers onboarded using an inadequate process/system. This is a timely and expensive undertaking.

• We recommend early engagement to meet supervisors’ expectations.

• The Reserve Bank of New Zealand does not, nor will we endorse or approve any specific Electronic Identity Verification provider.
Expired Passports

- As per the statement released August 9th 2019, an expired passport is only acceptable as part of an Exceptions Handling Procedure.
- RBNZ acknowledges some reporting entities currently accept expired passports and RBNZ has not previously raised concern with this.
- Reporting entities will be given a reasonable timeframe to update their policies/procedures and websites/collateral etc.
- No retrospective remediation is required.
Expired Passports

- RBNZ expects all reporting entities it supervises to have an Exceptions Handling procedure which is fit for purpose.

- The procedure need not be “one size fits all”. RBNZ is comfortable with different requirements and/or sign off for different levels of risk.

- **For example**: If an expired passport is presented alongside an appropriate proof of address document, your Exceptions Handling procedure may require approval by the Branch Manager – as opposed to a back office compliance team.

- Ensure that your process, and any customer decisions utilising an Exceptions Handling procedure are **well documented**.
Audit Timeframes

- Guidance has been released by the Joint Supervisors, outlining our expectations with relation to Section 59 Audits.

- The Guidance has specific examples of when your Audit is due every two years.

- In summary, the audit is not considered complete until the date on which the audit report is issued.

- This means that you must ensure that your next audit report is issued on or within two years from the date on which your last audit report was issued.
Audit Timeframes

Business completes an AML/CFT audit

ABC Limited became a reporting entity on 31 August 2015. ABC Limited completed its first AML/CFT audit (including the audit report) on 31 August 2017. ABC Limited’s next AML/CFT audit report must be issued by 31 August 2019 (i.e. two years from 31 August 2017).

Business completes an early AML/CFT audit

QWE Limited became a reporting entity on 30 June 2013. The company completed its first AML/CFT audit (including the audit report) on 30 March 2015, before the due date of 30 June 2015. QWE Limited’s next AML/CFT audit report must be issued by 30 March 2017 (i.e. two years from 30 March 2015).
Audit Timeframes

• Failure to obtain a completed Section 59 Audit report within two years of the previous audit report, could be considered either;
  • A minor breach (if there are reasonable circumstances which caused a delay, or the delay is not considerable)
  • A material breach (if the reason for the delay is poor planning/organisation, the circumstances which led to the delay are not reasonable, or the delay is considerable).

• Failure to meet an audit deadline may be considered for referral to the enforcement function, however will be reviewed in light of the other outstanding AML/CFT issues or on-site findings.
Audit Timeframes

- We appreciate that all entities will be at different stages along their audit cycle. The RBNZ will consider this during its on-sites in 2020.

- HOWEVER…. (further discussion during the Regulations Consultation session)
Update on Mutual Evaluation of New Zealand
Background

• AML/CFT Act 2009 is underpinned by “recommendations” issued by the Financial Action Task Force.

• New Zealand was previously assessed in 2009. Focus was just on “technical compliance”, now “effectiveness.”

• Over 40 jurisdictions assessed. Each evaluation takes approximately 14 months and 8 years to complete a cycle.
Financial Action Task Force Immediate Outcomes

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<tr>
<th>Immediate Outcome</th>
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<th>High level focus of Outcome</th>
<th>Immediate Outcome</th>
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<th>High level focus of Outcome</th>
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<tbody>
<tr>
<td>Risk, Policy and Co-ordination</td>
<td>1</td>
<td>• How well does the country understand its ML/TF risks.</td>
<td>ML Investigations/Prosecutions</td>
<td>7</td>
<td>• How well money laundering offences and activities are investigated and offenders are prosecuted, and the extent offenders are subject to effective, proportionate and dissuasive sanctions.</td>
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<td>International Co-operation</td>
<td>2</td>
<td>• How well a country provides constructive and timely information or assistance when requested by other countries.</td>
<td>Confiscation</td>
<td>8</td>
<td>• How well does a country confiscate the proceeds of crime.</td>
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<td>Supervision</td>
<td>3</td>
<td>• How well do supervisors appropriately supervise, monitor and regulate entities for compliance with AML/CFT requirements.</td>
<td>TF Investigations/Prosecutions</td>
<td>9</td>
<td>• How well TF offences and activities are investigated and offenders are prosecuted.</td>
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<td>Preventative measures</td>
<td>4</td>
<td>• How well entities understand their money laundering and terrorist financing risks and apply preventative measures commensurate with those risks.</td>
<td>TF Preventative measures</td>
<td>10</td>
<td>• How well does a country use preventative measures to prevent terrorists/terrorist organisations from raising, moving and using funds, and • How well a country prevents abuse in the ‘not for profit’ sector.</td>
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<td>Legal persons/arrangements</td>
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<td>• How well does a country prevent legal persons and arrangements from abuse for ML/TF. • To what extent is beneficial ownership information available to competent authorities.</td>
<td>Proliferation financing</td>
<td>11</td>
<td>• How well does a country use preventative measures to prevent persons involved in the proliferation of weapons of mass destruction from raising, moving, and using funds consistent with the relevant United Nations Security Council Resolutions.</td>
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<td>Use of Financial Intelligence</td>
<td>6</td>
<td>• How well is financial intelligence used by competent authorities for money laundering and terrorist financing investigations.</td>
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What will the evaluation process look like?

• Three weeks of interviews with relevant agencies-public and private sector.
• Additional information requests.
• Drafting of Mutual Evaluation Report – various iterations.
• Report presented and adopted at FATF Plenary in October 2020.
• Progress updates at future plenaries.
# New Zealand vs other FATF members

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**Immediate Outcome Rating**

- **HE**: High level of effectiveness - The Immediate Outcome is achieved to a very large extent. Minor improvements needed.
- **SE**: Substantial level of effectiveness - The Immediate Outcome is achieved to a large extent. Moderate improvements needed.
- **ME**: Moderate level of effectiveness - The Immediate Outcome is achieved to some extent. Major improvements needed.
- **LE**: Low level of effectiveness - The Immediate Outcome is not achieved or achieved to a negligible extent. Fundamental improvements needed.
RBNZ’s 2020 Plan
On-site programme

- Planning for 2020 on-site programme to commence in November.
- Reporting entities will be contacted in November/December.
- Prefer to conduct on-sites after Section 59 audits.
- On-sites to extend to all Designated Business Group members.
- On-sites will vary from 1 – 5 days in length.
- Attendance by other AML/CFT supervisors.
Outreach

• Specific outreach for auditors and consultants.

• Outreach for NBDT and Insurance sector.

• Continue 6 monthly sessions with New Zealand Bankers’ Association.
What else?

• Commence next review of RBNZ’s Sector Risk Assessment.

• Publish AML/CFT Supervision Manual.
Consultation on Expiring Regulations
Consultation on Expiring Regulations: Substantive change

• Definitions Reg 15 & Exemptions Reg 15 – Stored Value Instruments

• Proposed approach

“Prescribe principles to supplement the current regulations to assist reporting entities with determining how a stored value instrument is treated by the AML/CFT regime. The principles would prescribe how reporting entities should treat the instrument depending on the risk associated with the instrument. For example, a high-risk instrument may have a lower occasional transaction threshold”.
Consultation on Expiring Regulations: Minor change

- Exemptions Reg 8 – Transactions exempt from section 49(2)(d)

- Proposed approach

“Update this regulation to ensure clarity and ensure that transactions below applicable thresholds are exempt from record keeping requirements”. 
Consultation on Expiring Regulations: New Regulations

• Allowing for inclusion of limited partnerships in a designated business group.

• Limited exemption for reporting entities subject to section 143(1)(a) orders.

• Requiring enhanced due diligence when a company has nominee directors.

• Changing the timeframes for section 59 audits.
Consultation on Expiring Regulations

• We **strongly encourage** you to provide feedback to the Ministry of Justice by 30 October 2019.

• Let us know what items you consider to be the biggest pain points, so we can work proactively with the MOJ on the areas you feel will have the biggest impact.