

In view of the BIS Consultative Document on guidelines for interaction between prudential supervision and prevention and combating money laundering and terrorist financing, we consider it important to include a recommendation that prudential supervisors should inform AML / CFT supervisors of Financial Institutions that obtained positive results above any parameter (for example, above 1 market standard deviation). The main reason is that prudential supervisors, as a rule, are concerned with negative results, paying little attention to positive ones.

The action would be justified by the fact that many Financial Institutions (mainly smaller ones) may be obtaining good operational results due to the provision of financial services to criminal organizations (consciously or unconsciously), through internal or external fraud, as well as due to audacious business strategy to achieve ambitious results. Thus, the reversal of the inflow of resources due to anti-crime measures by other authorities or even by decision of Criminal Organization itself that detaches from criteria of economic-financial rationality could bring sudden negative consequences, causing damages to the integrity of the financial system.

The event would be in line with the assessment of both the operational risk and the strategy risk of the Financial Institution.