

A2. Client Case Study: Independent Evaluation of AML/CTF Program

INDEPENDENT EVALUATION |
AML/CTF UPLIFT |
FINANCIAL CRIME &
COMPLIANCE UPLIFT |
OPERATING MODELS |
DE + OE TESTING

The ask?



An **outsourced responsible entity** engaged PX Partners to conduct an Independent Review of their AML/CTF Program, and the Program of each underlying Investment Manager. As an RE managing schemes **for multiple investment manager clients**, the review needed to give comfort to both the RE and the underlying managers it supports.

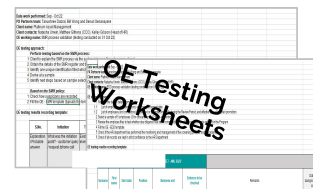
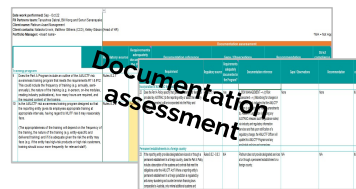
The client valued PX Partners' **deep sector expertise** and trusted us to ensure the outputs and recommendations were right-sized for their organisation and tailored to each investment manager's risk profile.

The px Difference



Because we **conduct these reviews regularly**, we know the industry benchmark, **what good looks like** and how to right-size the work. That meant we moved quickly, **focused effort where it mattered**, and gave the client value add insights and tailored outputs rather than a generic checklist. The result was actionable findings and practical uplift the client could implement, backed by genuine confidence in their ongoing compliance with the Act and Rules.

Below are some examples of our internal and external outputs.



The so what?



We drew on **deep, repeat AML/CTF experience** to streamline the review and reduce the load on the client's Risk and Compliance team. We:

- Conducted an extensive independent review of the AML/CTF Programs and the supporting controls, processes, systems and tools
- Identified compliance gaps and uplift opportunities to ensure each Program was **fit for purpose**
- Tailored the review to the RE operating model, recognising the obligations owed across **multiple investment manager Programs** and their commonalities with the RE's own AML/CTF framework.

