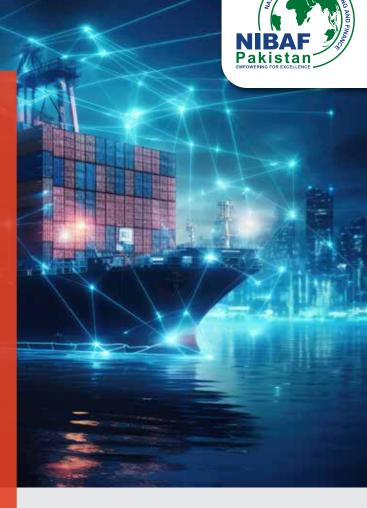


This is specially designed program on International Trade and Trade Based Money Laundering. The program shall cover mainly areas on International trade, TBML, STR Reporting, Adopting Risk based approach, Control gaps identified during SBP Assessments and case study based learning based on SBP findings. We are pleased to mention that outline and reading material is designed after rigorous deliberations with industry experts and all the trainers who are part of this program. Further, it is a specially designed focused course by NIBAF on the subject to assist requlated entities for adopting better risk management practices to reduce non-compliance risk.







Training Date September 16-18, 2025



Training Venue NIBAF, Pakistan (Karachi)

TRAINING MANAGER: ABDUL AZEEM DOSANI



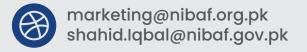
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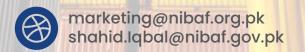




The target audience may be officers of Trade Operations, AML Units of Compliance Department / ATBML Units, Trade Relationship managers, Trade processing officers, TMS analysts, Internal Audit officer etc.

Trainer(s)

Subject Matter Experts from State Bank of Pakistan and Financial Market.







INTRODUCTION TO TRADE FINANCE / INTERNATIONAL TRADE

Brief Contents

- Parties involved in trade transactions and their roles & responsibilities
 - International Trade Facilitation Bodies (UNCITRAL, WTO, ICC)
 - Financial Institutions (involvement of Correspondent Banking)
 - Transports & Logistics Providers (Shipping Lines, Airline Companies, Shipping Agents)
 - Government Departments and Regulatory Authorities
 - Insurance Companies
- End-to-end process of Imports & Exports
- Methods of trade settlements & Due Diligence requirements
 - ♦ Letter of Credit
 - Documentary Collection
 - ♦ Bank Contract
 - Open Account
 - Advance Payment
- Trade Documents and International Commercial Terms (INCO Terms)
- International Rules/Convention of Trade Finance
- Local Regulatory Environment









Trade Based Money Laundering (TBML)

Understanding TBML

- Understanding TBML
- ♦ Concept of TBML
- Magnitude of the problem and emerging concerns
- Key Stages of TBML
- Techniques of TBML (over / under invoicing, multiple invoicing, short / over shipment, Obfuscation & Phantom Shipments)

Guidance on TBML by international standard setting bodies (FATF / Wolfsburg)

- Vulnerabilities of International Trade
- Red flags on TBML
- Latest trends, developments and best practices on countering TBML
- Traditional v/s Emerging Risks of TBML
- High Risk Jurisdiction Rules
- Case Studies of TBML Typologies based on literature of international standard setting bodies

STR-TBML Reporting

- Selection of Report Indicator in STR-TBML
- Reason for Suspicion in STR-TBML
- Transaction Creation in STR-TBML
- Documentation Required in STR-TBML









Trade
Based Money
Laundering
(TBML)

Understanding SBP's TBML Framework

- Developing an entity risk profile of banks for their trade business/relationships
- Expectations for Governance & Oversight, Policies & Procedures
- Roles and responsibilities of different business and control functions
- Risk Profiling of Trade Customers & Development of own risk profile
- Price Due Diligence, Financial Instrument (FI) Due Diligence, GD Monitoring
- Enhanced Due Diligence (EDD) requirements
- Implementation of TMS Scenarios, Sanctions Regime & trade risk associated with them
- Capacity building of trade/TBML unit staff

Adopting a risk-based approach for TBML

- Basic ingredients of Risk Based Approach
- Risk assessment of customers and transactions –
 Spotting of red flags and conducting EDD
- Transaction Monitoring System
- KYC Lifecycle
- PSW Data (Custom's Assessments)
- Historic Trade Transactions Data
- Effective Investigation: Suspicious Activity Indicators / Suspicious Activity Reporting
- Role of technology and data analytics in detecting TBML

Control gaps identified during SBP Assessments

- KYC /Trade Risk Profiling
- Price Due Diligence
- GD Monitoring
- Trade Payments
- EDD measures
- Related Party Transactions
- TMS Scenarios
- Deposit Account activity
- Case Studies based on SBP Inspection Findings

