



TBML IN PAKISTAN CHALLENGES AND WAY FORWARD



COURSE OVERVIEW

Trade-Based Money Laundering (TBML) is a significant financial crime risk that exploits legitimate international trade transactions to conceal illicit funds. This training program focuses on the challenges of identifying and preventing TBML in Pakistan, with particular emphasis on trade-related red flags, transaction monitoring, regulatory requirements, and effective compliance controls. Through practical, case-based discussions, participants will explore suspicious customer behavior, inconsistencies in trade documents and pricing, unusual transaction patterns, and high-risk geographical indicators. The program will also examine the role of automation, data analytics, and emerging technologies in strengthening monitoring systems, improving detection capabilities, and enhancing trade compliance practices.



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LEARNING OBJECTIVE

By the end of this program, participants will be able to:

- Explain the concept of TBML, its common techniques, and its key challenges in Pakistan.
- Identify red flags and suspicious patterns in customer profiles, trade transactions, documentation, pricing, and geographical routing.
- Develop and enhance trade transaction monitoring scenarios, including appropriate thresholds, alert assessment, escalation, and suspicious transaction reporting.
- Evaluate the effectiveness of trade compliance controls and the use of automation and data analytics in detecting suspicious activities.
- Recommend practical measures to strengthen TBML prevention, monitoring, and compliance practices.

COURSE OUTLINES

Module 1: TBML Landscape in Pakistan

- Overview of TBML and its common techniques.
- Pakistan's trade-related exposure and regulatory framework.
- Role of SBP, FATF, Pakistan Single Window (PSW), and customs data in trade compliance.

Module 2: TBML Red Flags and Suspicious Patterns

- Customer profile and transaction-related indicators.
- Inconsistencies in trade documents, goods descriptions, pricing, quantities, and shipment details.
- High-risk jurisdictions, unusual routing, and suspicious relationships between trading parties.
- Practical case studies and trade document review.

Module 3: Effective Trade Transaction Monitoring

- Designing and calibrating transaction monitoring scenarios.
- Setting appropriate thresholds and assessing alerts.
- Escalation procedures and suspicious transaction reporting.

Module 4: Trade Compliance Controls and Automation

- Strengthening customer due diligence and pre- and post-transaction controls.
- Use of rule-based monitoring systems, OCR, robotic process automation (RPA), and AI-assisted analytics.
- Data quality, governance, documentation, and audit trails.

Module 5: Challenges and the Way Forward

- Addressing data gaps, legacy systems, and skills limitations.
- Improving access to trade and customs data and price benchmarks.
- Strengthening analytics capabilities, periodic reviews, and coordination between banks and regulators.
- Developing practical action plans to enhance TBML monitoring and prevention.



WHO SHOULD ATTEND?

- Trade finance,
- Trade operations,
- Trade compliance, and
- Financial crime prevention
- AML/CFT monitoring analysts
- Relationship and Branch Managers handling trade customers
- Internal Audit and Risk Management
- Compliance head and CCO office
- IT, analytics and process-automation teams
- Correspondent banking staff

FACILITATOR

Mr. Salim Thobani is a highly skilled financial crime compliance professional specializing in Anti-Money Laundering (AML), Trade-Based Money Laundering (TBML), sanctions compliance, financial crime prevention, and Regulatory compliance. He holds several professional certifications, including Certified Anti-Money Laundering Professional (CAMLPP), Certified Trade Compliance Specialist (CTCS), ACAMS, Advanced Certification in Sanctions Screening (ACSS), and Certified Sanctions Screening Professional (CSSP). With extensive expertise in AML and financial crime compliance, he is proficient in risk assessment, transaction monitoring, regulatory reporting, sanctions screening, customer due Diligence, and enhanced due diligence. He has specialized knowledge of TBML risk identification and mitigation, sanctions evasion typologies, and compliance with OFAC, United Nations, and European Union sanctions regimes. He also possesses in-depth knowledge of FATF guidelines, local AML and CFT regulations, and international regulatory standards. Throughout his career, Salim has contributed to the implementation of AML and CFT compliance frameworks for financial institutions, conducted TBML risk assessments, strengthened due diligence processes, and provided advisory support on sanctions and financial crime risks. He is also experienced in developing compliance programs and delivering specialized training to financial sector professionals on emerging financial crime risks and regulatory requirements. His professional focus is on strengthening financial integrity through effective compliance strategies, robust risk management, and practical financial crime prevention measures.

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