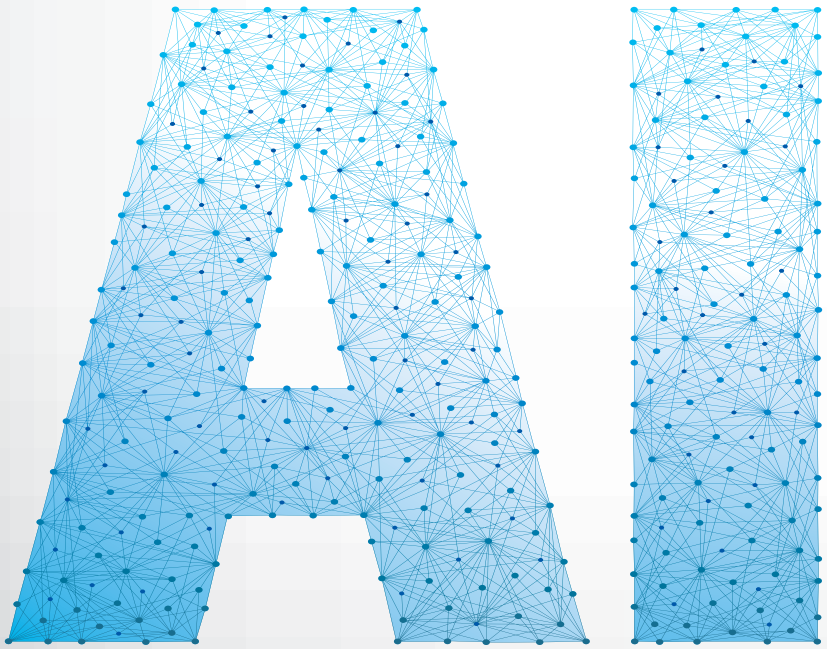
如何借助人工智能解决代理行业务关系中的难题

通过代理行业务进行的国际汇款对全球经济至关重要，因为金融机构依赖这些代理行关系来转移客户资金。随着监管要求越发严格，以及空壳公司相关风险不断上升，金融机构在代理行业务关系管理上面临的挑战越来越大。

有些情况下，由于担忧可能受到监管机构审查、调查或巨额处罚，企业不愿再维护与高风险司法管辖区内的货币服务企业 (MSBs) 或代理行相关的代理行业务关系。人工智能 (AI) 和先进数据分析技术为金融机构带来了新型解决方案，可以帮助他们验证代理行客户的业务关系。

据世界银行于 2015 年发布的一份报告，全球汇款金额有望增长，但增幅将放缓。[1] 汇款交易的巨大交易量带来了巨大的监管压力、风险控制和合规成本，让金融机构坐立不安。因此，金融机构经常选择终止外国代理行业务关系以化解风险，而不是针对维持代理行账户关系工作中的固有风险和挑战研究解决方案。



金融犯罪执法网络 (FinCEN) 依据美国《爱国者法》第 312 条的规定，颁布“代理账户和私人银行业务特别尽职调查”暂行条例之后，代理行业务的监管形势发生了变化。为应对 9/11 恐怖袭击带来的挑战，FinCEN 颁布了这些措施，要求金融机构针对外国代理行业务关系实施特定的“了解您的客户”(KYC) 和客户尽职调查程序 (CDD)，有些情况下还要实施增强尽职调查程序 (EDD)。

传统反洗钱工具和流程无济于事；新型技术前来救场

归根结底，想要有效管理代理行业务关系，就要具备适当的管理工具，从而高效地分析使用代理行业务的实体。合规与调查小组经常面临的挑战包括确定代理行客户的业务目的、核查这些客户业务的辅助线信息。

金融机构往往发现，由于缺乏必要的数据，他们提交的可疑活动报告 (SAR) 非常保守。

[1] “Remittances Growth to Slow Sharply in 2015, as Europe and Russia Stay Weak; Pick Up Expected Next Year”，世界银行，2015 年 4 月 13 日，http://www.worldbank.org/en/news/press-release/2015/04/13/remittances-growth-to-slow-sharply-in-2015-as-europe-and-russia-stay-weak-pick-up-expected-next-year

对 TMS 的依赖将使金融机构面临巨大的风险。当前，无论是在非法交易还是误报的识别上，TMS 的表现都无法令人满意。据估计，银行系统内 50% 的金融犯罪都能逃过 TMS 的监控。另外，反洗钱合规从业者都了解，TMS 生成的警报中约 95% 属于误报。

与 TMS 不同，基于人工智能的系统可以发现交易行为模式，通过分析这些模式的意图能够揭露异常活动。例如，如果交易特征不符合对某一特定类型账户设定的预期频率和指向模式，TMS 就可能无法发现，但有效的人工智能解决方案则能发现。人工智能解决方案可以学习正常报告中工资账户活动的基准，进而发现工资交易中任何有违常规的现象，并将其归为潜在的虚假问题，值得合规人员进行进一步调查。

人工智能可以从根本上改善代理行业务的现状

高级数据分析和人工智能技术可以帮助金融机构更有效地管理代理行业务。人工智能的一个重要功能是能监控客户与其他客户和实体的关系，并从他们的关联行为中进行学习。基于人工智能技术的反洗钱解决方案可以自动进行代理行业务的交易分析，发现异常行为，识别导致这些异常情况的最终客户。增强型人工智能解决方案还能综合考虑季节性、兼并和收购、随机性和其他合理差异的影响，进而发现可能给机构带来巨大风险的异常问题。

对公司进行分析以及对公司关系展开调查，对于遏制去风险化趋势是不可或缺的。记录代理行客户的历史行为数据，包括交易量及交易金额、预期交易量及交易金额、当前及持续的最终受益所有人数据，以及相关公司任何或所有负面媒体报道等方面的信息，有助于对代理行风险进行精准的管理，并对客户的客户开展“了解您的客户”流程。

将同样的数据点扩展实施到公司的相关方（客户），能够给银行或被监管的金融机构内部的合规和调查团队提供出一幅整体风险图谱。在数据分析和人工智能技术的帮助下，机构便能对前期花费巨大的代理行和虚拟客户尽职调查进行自动化处理，从而让调查人员掌握最重要的数据。

得益于数据分析和人工智能领域的进步，合规小组和反洗钱调查员能准确地履行监管义务，完善可疑活动报告，最终防止对代理行业务客户采取不必要的去风险化措施。

人的决策仍然是反洗钱合规的一个关键要素

负责发现可疑活动的反洗钱合规专员身处反洗钱前线。普通合规专员每天处理 8 到 10 个警报。专员需要查阅银行内的不同系统（包括了解您的客户和客户信息数据库），交叉参考 TMS 中出现的警报，并参考外部数据，才能最终对每一个案例最初判断。通过运用人工智能技术，合规专员的工作效率将大大提升，不再需要在海量的数据中进行单调、费时的工作。

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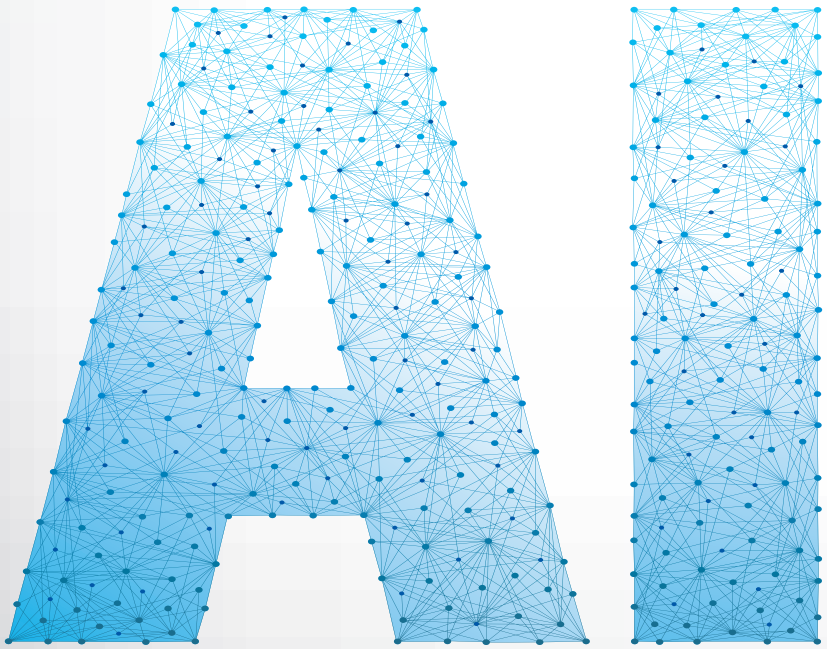
How artificial intelligence can help overcome challenges in correspondent banking relationships

The capacity to send and receive international payments through correspondent banking is critical to the global economy as financial institutions rely on these relationships to move their customers' money. As a result of increased regulatory requirements and risk related to shell companies, correspondent banking relationship management has become a more challenging undertaking for financial institutions.

In some cases, organizations no longer desire to manage correspondent banking relationships linked to money services businesses (MSBs) or correspondent banks in high-risk jurisdictions over fears of potential regulatory scrutiny, investigation and exorbitant penalties. New solutions powered by artificial intelligence (AI) and advanced data analytics technologies offer much promise to financial institutions to help assist with verification of business relationships for correspondent banking customers.

According to estimates in a 2015 report by the World Bank, global remittances are expected to grow, albeit at a slow pace.[1] High remittance volume brings increased regulatory pressures, risk and compliance costs that bite at the heels of financial institutions. The unfortunate outcome is that financial institutions often choose to de-risk foreign correspondent banking relationships rather than deal with the inherent risk and challenges of maintaining correspondent banking accounts.



The correspondent banking regulatory landscape changed when the Financial Crimes Enforcement Network (FinCEN) enacted "Special Due Diligence for Correspondent Accounts and Private Banking" interim regulations under Section 312 of the USA PATRIOT Act. FinCEN's actions were in response to the 9/11 terrorist attacks and mandated that financial institutions enact specific know your customer (KYC), customer due diligence (CDD) and, in some cases, enhanced due diligence (EDD) procedures for their foreign correspondent banking relationships.

AML tools and processes are failing: New technologies to the rescue

Effective correspondent banking relationship risk management boils down to having the adequate tools to efficiently resolve entities that use correspondent banks. Recurring challenges for compliance and investigative teams include establishing an economic purpose and verifying complementary lines of business for correspondent bank customers.

Legacy technologies including rules-based transaction monitoring systems (TMS) attempt to detect and report on transaction details that indicate suspicious activity, but are largely ineffective. Financial institutions often find themselves filing conservative suspicious activity reports (SARs) because the necessary data is unavailable.

[1] "Remittances Growth to Slow Sharply in 2015, as Europe and Russia Stay Weak; Pick Up Expected Next Year," The World Bank, April 13, 2015, http://www.worldbank.org/en/news/press-release/2015/04/13/remittances-growth-to-slow-sharply-in-2015-as-europe-and-russia-stay-weak-pick-up-expected-next-year

The reliance on TMS is presenting significant risk to financial institutions. An unacceptable number of illicit transactions, or false negatives, are not flagged by today's TMS. It is estimated that 50 percent of financial crimes in the banking system pass through TMS unnoticed. In addition, it is understood by anti-money laundering (AML) compliance practitioners that approximately 95 percent of the alerts generated by TMS are false positives.

Unlike TMS, artificial intelligence-based systems can detect patterns of behavior, analyze the intent of those patterns and expose anomalous activities. For example, transactions that do not follow the usual frequency and directional patterns expected for a given type of account may not be flagged by a TMS, but would be identified with an effective AI solution. An AI solution can learn the baseline of normal reported payroll account activity and thus identify any irregularities in payroll transactions as potentially fictitious and worthy of further investigation.

AI can radically improve correspondent banking

Advanced data analytics and AI technologies can help financial institutions manage correspondent banking more effectively. An important function of an AI solution is its ability to monitor customers' relationships to other customers and entities and learn from their associated behavior. An AI-based AML solution can automate the transactional analysis of correspondent banking relationships to find anomalous behaviors and identify the end clients causing those anomalies. An AI-enhanced solution can also account for seasonality, mergers and acquisitions, randomness and other legitimate variances to find the illegitimate anomalies that are presenting significant risks to financial institutions.

Entity resolution and the investigation of entity relationships are integral to curbing the de-risking cycle. The ability to establish behavioral histories related to the volume of transactions and their amounts, expected volume of transactions and amounts, current and ongoing ultimate beneficial owner data, and any/all adverse media related to the entity in question, is the key to ensuring accurate correspondent banking risk management and know your customer's customer.

Expanding the same data points to an entity's related parties (customers) provides a holistic risk picture for compliance and investigative teams within a bank or covered financial institution. With data analytics and AI, time-consuming and costly correspondent bank and pseudo-customer investigations can become automated, providing investigators with the most essential data.

Advancements in data analytics and AI can enable compliance teams and AML investigators to fulfill their regulatory obligations with precision, improve SAR reporting and ultimately prevent unnecessary de-risking of correspondent banking customers.

Human decision-making is still a key element to AML compliance

On the front line against money laundering are AML compliance professionals tasked with identifying suspicious activities. The average compliance professional works eight to 10 alerts each day. To make a decision on each case, the professional is required to review multiple and disparate bank systems, including KYC and customer information program databases, as well as cross-reference TMS for related flags and turning to external sources of data. The application of AI can significantly enhance the capabilities of human compliance professionals by eliminating tedious, time-consuming tasks involving massive amounts of data.

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