

Global OFAC Compliance Review

OVERVIEW



CHALLENGE

A large complex foreign financial institution with operations in the United States was ordered, pursuant to a federal enforcement action, to have an annual OFAC compliance review performed by an independent consultant.



SOLUTION

Treliant performed successive global sanctions compliance reviews, including review of sanctions governance, risk assessment, data and technology, affiliate review, QC/QA, assurance, internal audit, and issue review.



APPROACH

Treliant's team performed testing remotely and onsite at various locations in the UK, Europe, the Middle East, and Asia to assess the design and effectiveness of the bank's global sanctions program.

RESULTS



As a result of Treliant's reviews, gaps, and areas of improvement were identified and remediation actions were initiated.



Treliant's reviews have led to enhanced global alignment with the company's sanctions risk management framework and greater consistency throughout the global execution of its sanctions compliance program.

