



Risk-Based CDD: From Onboarding to Monitoring

Days/Dates	November 2026: 2 nd , 3 rd , 4 th and 5 th
Time	17:00 to 19:30
Number of Hours	10 hours
On-site or Online	Online via Zoom
Fee	178 Eur
Deadline	26 th October 2026
Who should attend	<p>This course is designed for a broad range of professionals involved in, or supporting, AML/CFT compliance within Maltese subject persons. It is particularly suitable for individuals responsible for the implementation, review, or oversight of CDD processes across the customer lifecycle</p> <p>The course will be beneficial for:</p> <ul style="list-style-type: none"> - Compliance and financial crime professionals - CDD/KYC analysts and onboarding teams - Internal control personnel including internal audit or quality assurance professionals - Staff and management with oversight responsibilities for AML/CFT <p>The course is also suitable for individuals seeking to strengthen their practical understanding of CDD and Enhanced Due Diligence, particularly in areas frequently subject to regulatory scrutiny such as beneficial ownership, Source of Funds and Source of Wealth, and ongoing monitoring.</p>
Course content	<p>Effective Customer Due Diligence (CDD) remains at the core of any AML/CFT framework, yet it continues to be one of the most common areas of weakness identified during regulatory examinations in Malta. While many subject persons have established CDD procedures, challenges often arise in the consistent application of a risk based approach, particularly in areas such as beneficial ownership identification, Source of Funds and Source of Wealth assessments, and the application of Enhanced Due Diligence (EDD).</p> <p>This course is designed to establish how CDD and EDD should be applied in real operational settings — from initial onboarding through to ongoing monitoring. Participants will explore how customer risk is assessed, how documentation should be evaluated, and how CDD measures should evolve over the lifecycle of a business relationship.</p> <p>The course also addresses common implementation challenges, including insufficient documentation of rationale, and gaps in ongoing monitoring processes. Through practical examples and case-based discussions, participants will gain a clearer understanding of how to apply proportionate and defensible CDD measures in line with regulatory expectations.</p> <p><u>Course Agenda</u></p> <p>Day 1 – CDD Foundations & Risk-Based Approach</p> <ul style="list-style-type: none"> - Overview of AML/CFT obligations in Malta - Role of CDD within the AML framework - Applying the risk-based approach in practice - Customer risk assessment factors - Common weaknesses in risk assessment



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Day 2 – Beneficial Ownership and Customer Understanding

- Identifying beneficial owners
- Complex ownership structures
- Control considerations
- Practical case scenarios

Day 3 – Source of Funds vs Source of Wealth

- Key distinctions and regulatory expectations
- Evidence requirements and documentation standards
- Plausibility assessments
- High-risk scenarios (PEPs, HNWI's)
- Common errors and red flags

Day 4 – Enhanced Due Diligence in practice

- When EDD is required
- Applying proportionality
- EDD for high-risk customers and jurisdictions
- Ongoing monitoring for high-risk relationships
- Escalation and internal decision-making

Day 5 – Ongoing Monitoring and Control Effectiveness

- Trigger events and periodic reviews
- Updating customer risk profiles
- Linking CDD to transaction monitoring
- Identifying inconsistencies and red flags
- Common inspection findings in Malta

Course Outcomes

By the end of the course, attendees will be better equipped to identify weaknesses in their current approach, strengthen their CDD and EDD frameworks, and ensure that their processes are aligned with both the risk profile of their business and the expectations of competent authorities.

By the end of this course, participants will learn how to:

- Apply a risk-based approach to CDD across the customer lifecycle
- Distinguish clearly between Source of Funds and Source of Wealth and assess supporting documentation
- Identify and verify beneficial ownership in simple and complex structures
- Determine when Enhanced Due Diligence (EDD) is required and apply it proportionately
- Assess the adequacy, reliability and plausibility of CDD documentation
- Identify common red flags and inconsistencies in customer profiles
- Strengthen ongoing monitoring processes and trigger-based reviews
- Improve documentation and rationale to support regulatory defensibility
- Recognise common weaknesses identified during regulatory inspections and how to address them



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Trainer/s Bio

Stephanie Mangani is an Anti-Money Laundering specialist with over 13 years of experience in the financial crime area within the financial industry, including 5 years in the UK working on various AML projects at leading banks. Stephanie holds a B.Com (Hons) in Accounting from the University of Malta and a distinction in the ICA Diploma in AML. Stephanie held the roles of an MLRO, Compliance Officer and Data Protection Officer at different financial institutions. Stephanie is now a financial crime consultant to various subject persons including accountants, notaries, real estate agents and entities within the financial industry.

Certification

Upon successfully completing the course with 80% attendance, attendees will receive a Certificate of Attendance from Malta University Consulting