Key Regulatory Obligations

As someone in the Mexico office, you should know that:

- AML Mexican regime is contained into Art 212 from Securities Market Law (LMV-Ley de mercado de valores) and its secondary provisions.
- Local CIP and KYC are complex and require more data and documents than firmwide standards. Very little/no reliance is given to customers coming from another GS Legal Entity.

Protocols

Here are the protocols that must be followed:

- MCBO AML Policy
- For any new customer/products, an Initial Profile and KYC forms must be collected
- Any new customer must be met in person and the meeting must be documented as part of the onboarding documents.

Risks

Failure to follow these protocols poses the following risks:

- SML and anti-bribery regulations establish significant fines as a result of noncompliance with applicable regulations
- Increased regulatory scrutiny

Consequences

The consequences of non-compliance include:

- Fines starting 26k USD
- Personal imprisonment from 5 to 15 years
- Temporary/permanent Inhabilitation(prohibition to work in the financial industry) and business resolution

The Bottom Line

You are the first line of defense...if you see something or have any concerns, escalate.

Contacts

For any questions, concerns or escalations please reach out to your respective Money Laundering Regional Officer (MLRO)

Additional Information

- Mexican AML regulation
- Typical Money Laundering Schemes (Tipologías)
- In addition to the material in this training, the Anti-Bribery Group or your regional compliance officers may inform you of particular local laws, rules and regulations that may impose specific anti-bribery / anti-corruption legal or compliance requirements in Mexico. Please notify the Anti-Bribery Group of any new or changed requirements, which may require the Anti-Bribery Group to assess whether the firm's existing controls are sufficient to ensure compliance with such requirements. If applicable, please become familiar with those requirements. https://www.sna.org.mx/normatividad/