

# Administración de los riesgos de los bancos locales frente a los corresponsales del exterior

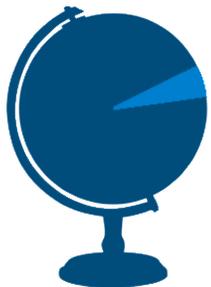
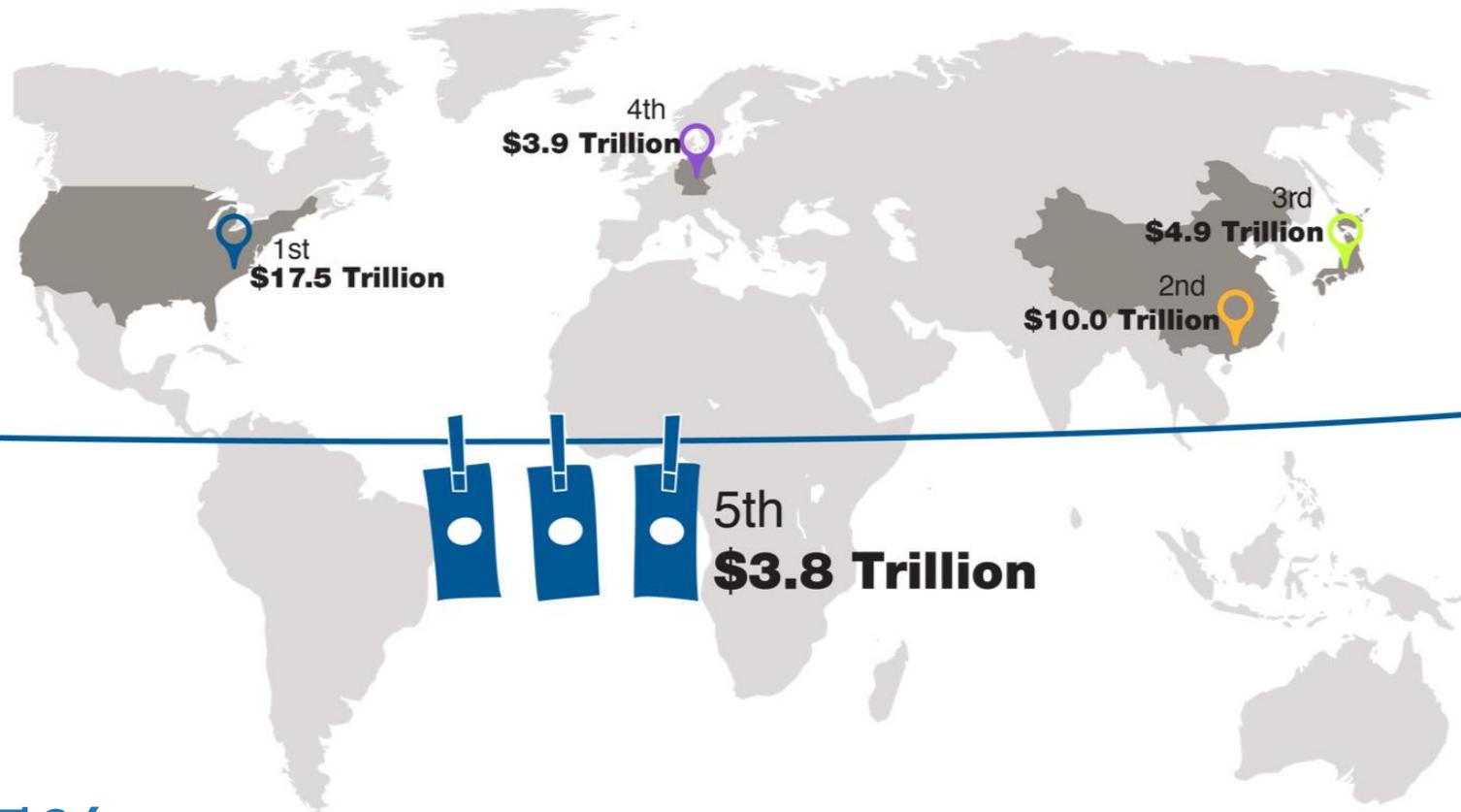


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**FELABAN**  
REPÚBLICA DOMINICANA

**David Schwartz**  
Presidente & CEO, FIBA



Si el “negocio” de lavado de dinero fuera una economía, sería el quinto más importante del mundo.

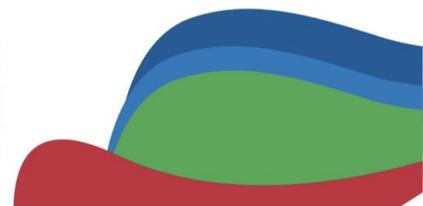


2–5%

Estimación del monto de dinero lavado expresado como proporción del GDP global.



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## Multas que bancos han pagado a los reguladores estadounidenses.

### Selected BSA/AML penalties at large banks

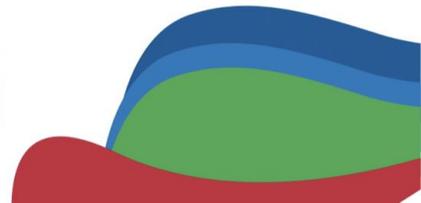
| Finced Company         | Holding Company           | Date     | Penalties paid to  | Penalties |
|------------------------|---------------------------|----------|--|-----------|
| BNP Paribas SA         | BNP Paribas SA            | 06/30/14 | Justice Department, Fed, NY Department of Financial Services, Treasury | \$8.97B   |
| JPMorgan Chase Bank NA | JPMorgan Chase & Co.      | 01/07/14 | Justice Department, OCC, FinCEN  | \$2.05B   |
| HSBC Bank USA          | HSBC Holdings Plc         | 12/11/12 | Justice Department, Fed, OCC, FinCEN, Treasury                         | \$1.92B   |
| U.S. Bank NA           | U.S. Bancorp              | 02/15/18 | Justice Department, Fed, OCC, FinCEN                                   | \$613M    |
| Rabobank NA            | Cooperative Rabobank U.A. | 02/07/18 | Justice Department, OCC, FinCEN  | \$369M    |
| Banamex USA            | Citigroup Inc.            | 07/22/15 | FDIC, California Dept. of Business Oversight                           | \$140M    |
| Banamex USA            | Citigroup Inc.            | 05/22/17 | Justice Department   | \$97M     |
| Citibank NA            | Citigroup Inc.            | 01/04/18 | OCC  | \$70M     |

Data compiled Feb. 20, 2018.

Source: S&P Global Market Intelligence



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## Cierre de cuentas de corresponsalía por motivos de riesgo regulatorio

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- Ha habido un aumento en las expectativas de los reguladores estadounidenses resultando en **mayores responsabilidades para los bancos;**
- Multas



## Cierre de cuentas de corresponsalía por motivos de costo

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- Costo de cumplimiento (alrededor de \$300 miles de millones anualmente);
- Los recursos y herramientas esenciales, como ejecutivos especializados, tecnología, y mayores presupuestos operativos, escasean o sencillamente son muy costosos;



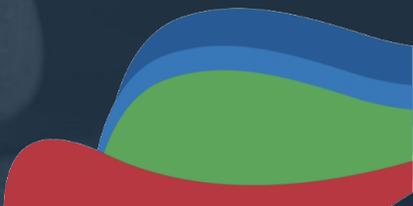
## Cierre de cuentas de corresponsalía por motivos de rentabilidad

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- El análisis del costo/beneficio de una relación de corresponsalía es de alta importancia dado que los bancos buscan productos con márgenes mas altos. **Si la relación no es rentable debe ser cerrada.**



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# Efecto de Basilea III

Effect on Capital required for a \$1,000,000 loan. Assumes a 10% capital ratio.

| Transaction Amount: \$ 1,000,000.00 |                    |         |                           | Previous                |                     |                  | Basel III                |                     |                  | PROPOSED                 |                              |                     |                  |
|-------------------------------------|--------------------|---------|---------------------------|-------------------------|---------------------|------------------|--------------------------|---------------------|------------------|--------------------------|------------------------------|---------------------|------------------|
| Country:                            | Loan to            | Tenor   | Type                      | Risk Weighting, Basel I | Risk Weighted Asset | Capital Required | Risk Weighting Basel III | Risk Weighted Asset | Capital Required | Product/Tenor adjustment | Adjusted Basel III weighting | Risk Weighted Asset | Capital Required |
| Chile (OECD: 2)                     | Foreign bank       | 1 year  | Trade                     | 20%                     | \$200,000           | \$20,000         | 50%                      | \$500,000           | \$50,000         | 30%                      | 20%**                        | \$200,000           | \$20,000         |
|                                     | Corporate Customer | 3 years | Unsecured Working Capital | 100%                    | \$1,000,000         | \$100,000        | 100%                     | \$1,000,000         | \$100,000        | N/A                      | 100%                         | \$1,000,000         | \$100,000        |
| Brazil, Peru (OECD: 3)              | Foreign bank       | 1 year  | Trade                     | 20%                     | \$200,000           | \$20,000         | 100%                     | \$1,000,000         | \$100,000        | 30%                      | 30%                          | \$300,000           | \$30,000         |
|                                     | Corporate Customer | 3 years | Unsecured Working Capital | 100%                    | \$1,000,000         | \$100,000        | 100%                     | \$1,000,000         | \$100,000        | N/A                      | 100%                         | \$1,000,000         | \$100,000        |
| Colombia (OECD: 4)                  | Foreign bank       | 1 year  | Trade                     | 20%                     | \$200,000           | \$20,000         | 150%                     | \$1,500,000         | \$150,000        | 30%                      | 45%                          | \$450,000           | \$45,000         |
|                                     | Corporate Customer | 3 years | Unsecured Working Capital | 100%                    | \$1,000,000         | \$100,000        | 100%                     | \$1,000,000         | \$100,000        | N/A                      | 100%                         | \$1,000,000         | \$100,000        |
| Honduras (OECD: 6)                  | Foreign bank       | 1 year  | Trade                     | 20%                     | \$200,000           | \$20,000         | 150%                     | \$1,500,000         | \$150,000        | 30%                      | 45%                          | \$450,000           | \$45,000         |
|                                     | Corporate Customer | 3 years | Unsecured Working Capital | 100%                    | \$1,000,000         | \$100,000        | 100%                     | \$1,000,000         | \$100,000        | N/A                      | 100%                         | \$1,000,000         | \$100,000        |

\*\* minimum



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## Evolucion de De-risking: Designación de ciertos sectores como riesgo mayor

- **Remesadoras (“MSBs”)**

- Transparencia
- KYCC

- **Cannabis**

- Ley federal vs estatal

- **Casinos y juegos de azar**

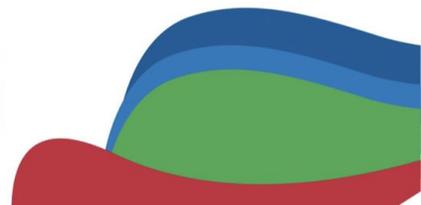
- FinCEN multas
- Bank of Bangladesh

- **Minería**

- NTR Metals/Peru



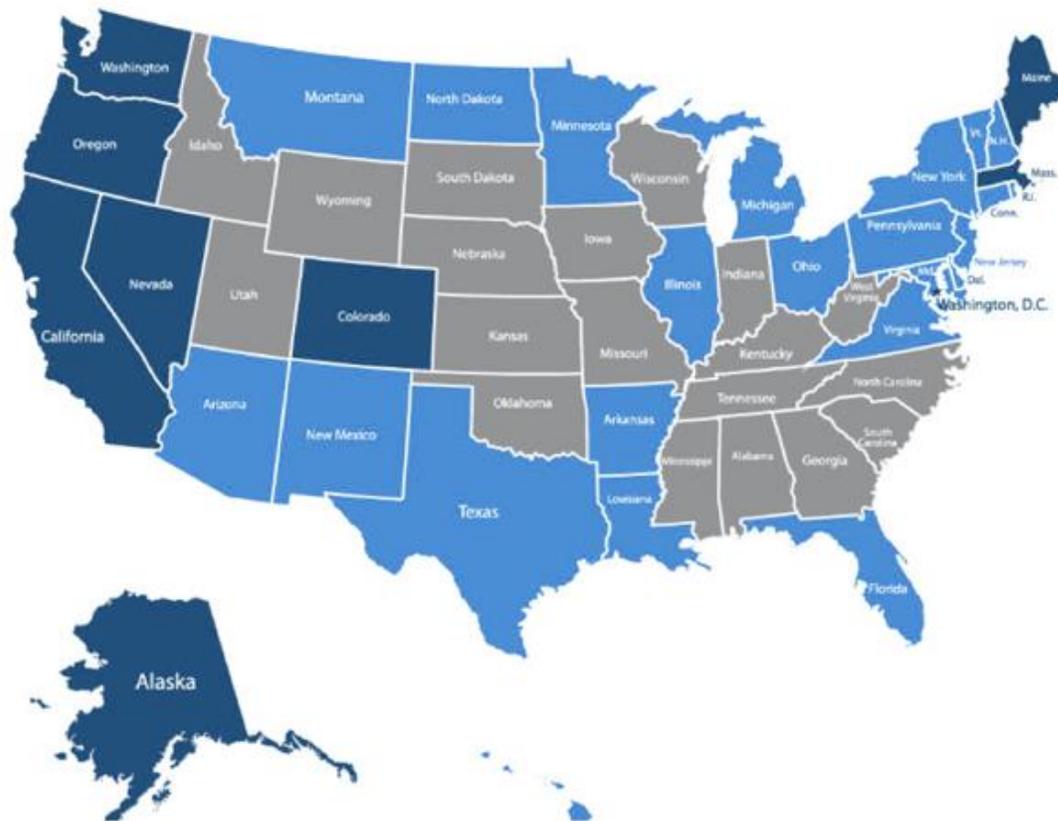
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# Ley federal vs estatal

## Where in the US is Marijuana Legal?

- Recreational
- Medical
- No legal access



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## Ley federal vs estatal

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La DEA y la ley federal trata heroína y marihuana como estupefacientes igualmente peligrosos.



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# Casinos y juegos de azar

2015:  
Caesars Palace



\$9.5 millones

2015:  
Tinian Dynasty



\$75 millones

2016:  
Philippines Casinos



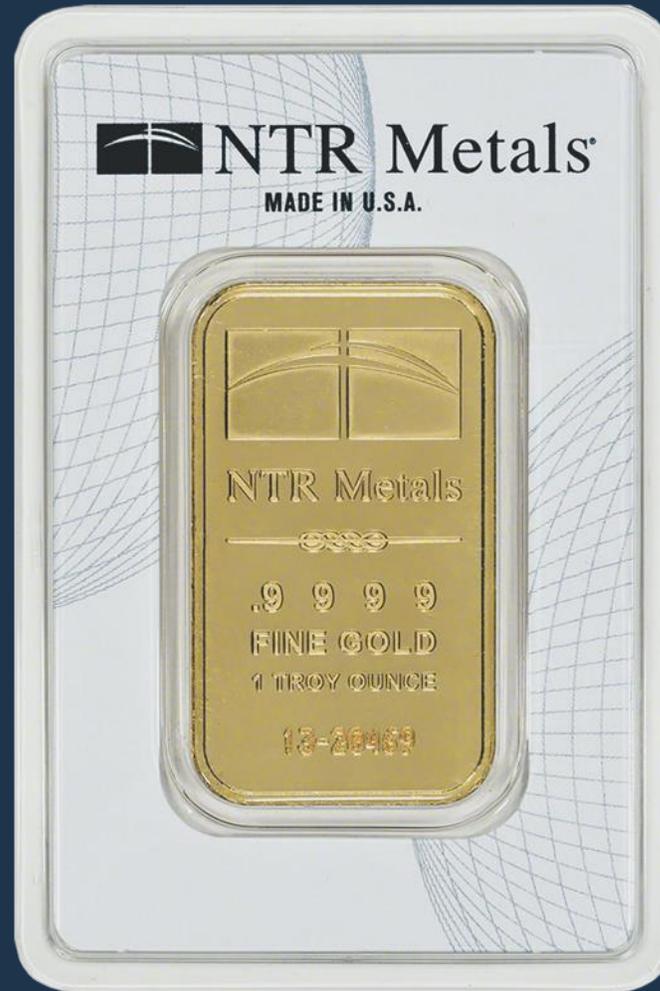
\$81 millones



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# Minería

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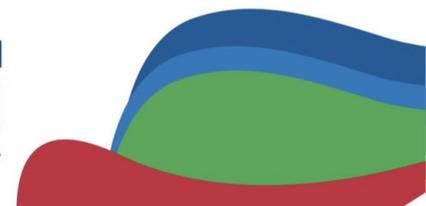


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## Mitigantes

- Capacitación;
- Política de abordar clientes;
- Asesoramiento de riesgo;
- Tecnología





# Muchas Gracias

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