

SERVICES FOR REGULATED FINANCIAL INSTITUTIONS

For regulated *financial institutions*

Banks, payments firms, fintechs and crypto businesses scaling their financial crime controls. Big-firm expertise, built around how your business actually grows, and delivered personally by someone who has run these functions in-house at Stripe, Adyen, Meta and OKX, and reviewed them independently as a KPMG Director. Controls that protect the firm without over-engineering it.

300+

FTEs led across 6 countries and 4 compliance functions

10m+

customers risk-rated under a bank-wide risk model

15+

years in financial crime, in-house and independent

01 · LEADERSHIP COVER

Our most-requested engagement.

Fractional MLRO / Nominated Officer

A senior practitioner formally appointed as your MLRO, Nominated Officer or Compliance Officer, part-time and properly accountable, not a name on a form. The right answer when you are in authorisation, scaling faster than a full-time hire makes sense, or need credible interim cover at short notice. Typically two to four days a month, scaling up or down with a month's notice.

The role covers

- ✓ AML control ownership & oversight
- ✓ SAR / STR review & decisioning
- ✓ Regulator & banking-partner correspondence
- ✓ Board & committee reporting
- ✓ SMF16 / SMF17 where they apply

02 · THE FULL RANGE OF SUPPORT

The AML lifecycle

Financial crime compliance is a cycle, not a one-off project. Each service supports a stage of it, so wherever you are today there is a clear way in, and a clear next step once it is done.

01 Risk Assessment

Enterprise-wide and customer risk assessments: methodology, data model and risk-rating that stand up to scrutiny. The foundation of every control you run.

02 AML Programme & Policy

Create, tailor or uplift your AML/CFT programme, policies and processes. Built to be operational and defensible, aligned to FATF and your local regulator.

03 Licensing & Registration

Get licence-ready and navigate market entry with the FCA and Singapore's MAS (PSA/SFA), with the AML framework, documentation and readiness regulators expect.

04 Training

Team and board training on AML, KYC, transaction monitoring, sanctions, fraud and investigations. Built by a practitioner, grounded in real cases.

05 Independent Review

A clear, practical assessment of your programme's maturity and effectiveness, including independent reviews for licence applications and regulator readiness.

06 Advisory

Practical advice for your compliance, product and ops teams, as and when you need it. A senior sounding board on the problems that do not fit a fixed scope.

03 · UNDER PRESSURE

More for regulated institutions

Targeted engagements for the pressure points that come with growth and scrutiny.

KYC / KYB framework optimisation

Onboarding and periodic-review frameworks that hold up as you scale: risk-based CDD and EDD, source-of-funds and source-of-wealth logic, UBO and entity structures, and the data model to run them without drowning your ops team in friction.

Banking-partner & sponsor due diligence

Get, and keep, the banking and sponsor relationships your business depends on. We prepare you for partner due-diligence reviews, answer the hard questions the way a counterparty's financial crime team will ask them, and close the gaps before they become blockers.

Financial crime target operating model

Design the operating model behind the controls: roles and accountabilities, three-lines-of-defence structure, governance and MI, tooling, and the resourcing plan to run it. A blueprint your board, auditors and regulator can all follow.

Independent review & regulator response

An independent, evidence-based read on effectiveness for a licence application, a board request, or a regulator's questions, plus hands-on support drafting the response, structuring remediation and demonstrating progress under time pressure.

04 · WAYS TO START

Three shapes of engagement

Most firms start with a health check, then move to whichever of the other two fits the work. Scope and price are agreed up front, before anything begins.

AML Health Check Fixed scope · weeks, not months A rapid, independent review of your AML framework: where you stand, where the gaps are, and what to fix first. A clear, prioritised picture you can take to your board or your regulator.	Fractional retainer 2 or 4 days per month Standing leadership cover: MLRO or Nominated Officer accountability, escalation decisions, board reporting and a senior voice on call. Scales up or down with a month's notice.	Project & interim Defined outcome or interim seat A framework build, a remediation, a licence application or interim leadership through a gap. Priced by the piece of work where the scope is clear, by the day where it is not.
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THE PRACTITIONER BEHIND IT

Phillip Ly, *Founder*

Financial-crime compliance leader with 15+ years on both sides of the table: in-house compliance leadership at OKX (interim Global Head of Compliance Operations, 300+ staff across 6 countries), Adyen (Head of CDD & KYC, APAC), Stripe (founding APAC AML team, Deputy MLRO) and Meta (Libra/Novi), plus independent AML framework reviews as a KPMG Director for firms pursuing payments licences. I have built the controls, run the operations behind them, sat opposite regulators, and reviewed other firms' frameworks before they were submitted. ACAMS-certified; ICA Postgraduate Diploma in AML.

Ready to talk? phil@northstaradvisorygroup.co.uk · www.northstaradvisorygroup.co.uk