

**Decision 2014-08 of 19 June 2015 against Mutuelle d'Ivry – La Fraternelle (anti-money laundering and counter-terrorist financing arrangements)**

In a decision in which the company was publicly named, the Sanctions Committee handed down a reprimand and a fine of EUR 500,000 to Mutuelle d'Ivry – La Fraternelle which, at the time of the ACPR's inspection in 2013, did not comply with certain of its essential anti-money laundering and counter-terrorist financing obligations arising from the Ordinance of 30 January 2009.

In this decision, the Committee pointed out that the fact that not all the observations put forward and documents produced by the MIF in response to the draft report had been attached to the inspection report did not in itself irretrievably prejudice the defence rights, since Mutuelle d'Ivry – La Fraternelle had been able, during adversarial exchanges before the Committee, to present its defence and produce all the information needed to support it.

On the merits of the case, the Committee judged that Mutuelle d'Ivry – La Fraternelle's classification of risks was not suited to the current characteristics of its customers and that its internal procedures overlooked certain key aspects. It also ruled that the company's knowledge of its customers was insufficient and that its transaction monitoring arrangements were lacking. It also found that the company had breached its obligation not to execute a transaction when the criteria justifying such execution were not met. Finally, it sanctioned shortcomings in respect of the company's compliance with the obligation to carry out a detailed review of certain transactions and its reporting obligations.

The extent of the sanctions takes into account the reduction in the scope of certain complaints and the corrective actions taken by Mutuelle d'Ivry – La Fraternelle.

This was the first time an institution in the insurance sector had been sanctioned for failing to comply with its obligations arising from the Third Money Laundering Directive.