

# Empowering sanctions engineering

Safeguarding smart compliance workflow



In association with

**SAYARI**

# The growing challenges of sanctions screening in financial services

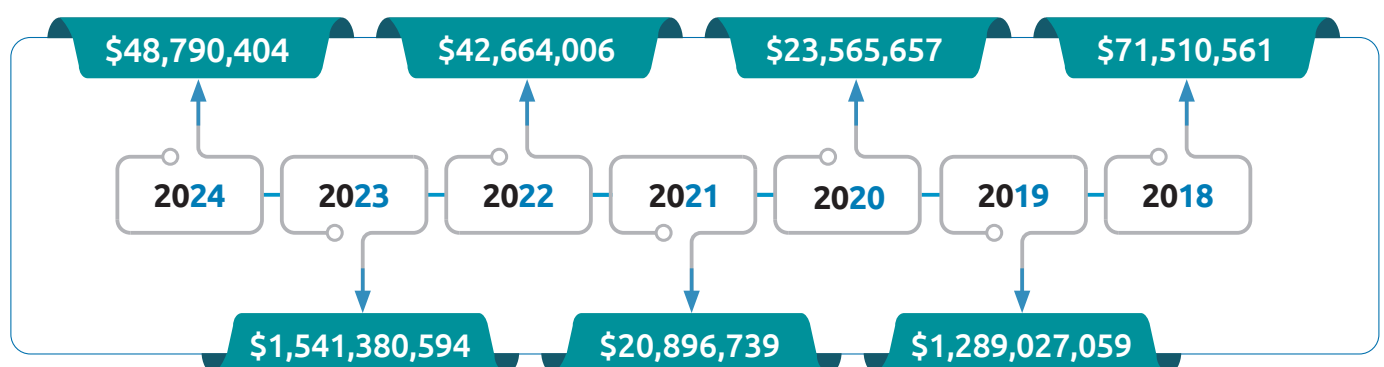
Sanctions screening has become a critical yet increasingly complex area for the financial services industry in every market region. Institutions everywhere are under immense pressure, not to mention scrutiny, to comply with evolving regulatory frameworks to mitigate risks while ensuring true efficiency. The challenges posed by outdated processes, false positives, fragmented data sources, and growing regulatory complexity threaten to overwhelm operational teams and hinder growth. According to a recent study, 98% of financial institutions in North America reported an increase in financial crime compliance (FCC) costs, with sanctions compliance being a significant contributor.<sup>1</sup>

Recent global sanctions enforcement actions highlight the significant penalties imposed for sanctions violations, with fines ranging from millions to over a billion dollars. These cases included individuals using informal systems to facilitate transactions with sanctioned countries, financial institutions penalized for inadequate oversight in new business ventures, and companies processing prohibited transactions for customers in sanctioned regions. For example, OFAC's recent actions highlight the serious consequences of non-compliance, including penalties reaching \$1.5 billion in a single year, and the potential for criminal charges, emphasizing the importance of robust compliance programs to mitigate these risks.

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of financial institutions in North America reported an increase in financial crime compliance costs.

## Example: OFAC civil penalties from 2018-2024



Source: <https://ofac.treasury.gov/civil-penalties-and-enforcement-information>

Traditional sanctions screening tools generate excessive false positives, diverting compliance teams from critical investigations and delaying operations. Daily payment holds caused by inadequate filtering further highlight the need for more efficient systems. Limited access to real-time data and fragmented reviews increase compliance risks, while complex

sanctions data, including beneficial ownership and jurisdictional controls, adds to the challenge. The globalization of financial markets and the rise of payment technology platforms create additional complexities, requiring institutions to screen both direct customers and intermediaries, amplifying risks and inefficiencies in cross-border transactions.



# Mandatory sanctions program requirements

An effective sanctions program requires financial institutions and businesses to implement comprehensive policies, procedures, systems, and controls. These elements include:

Risk assessment

Frequent regulatory updates

Periodic risk-based testing

Comprehensive screening

Intelligent matching logic

Regular independent audits

Transaction monitoring

Customer Due Diligence (CDD)

Ongoing training

Dynamic sanctions list updates

Enhanced Due Diligence (EDD)

Proper recordkeeping

Sustaining a successful sanctions program presents several challenges, particularly around ensuring data accuracy and recency in regulatory updates. The Specially Designated Nationals (SDN) list, for instance, targets individuals and entities such as terrorists, human traffickers, drug traffickers, and state-controlled organizations. A successful sanctions screening solution must be able to maintain list data in near real-time as updates are ingested from multiple file formats, such as xml and csv, directly from OFAC's website.

Flowing downstream, sanctions systems need to process Auto High Risk (AHR) screening scenarios with real-time advanced algorithms that leverage Machine Learning (ML), Natural Language Processing (NLP), and Large

Language Models (LLM). These technologies must coexist within a secure platform to detect phonetic similarities, name variations, pseudonyms, aliases, and legacy name changes without requiring manual human intervention.

Furthermore, due to the plethora of regional sanctions lists beyond the SDN list, it is imperative that software solutions incorporate Artificial Intelligence (AI) capabilities to achieve optimal performance in accordance with regulations. Sanctions solutions must optimize key data issues, including quality, standardization, anomaly detection, duplication, and throughput, to achieve optimal performance and maintain compliance with major regulations.



# Sanctions screening powered by Capgemini and Sayari

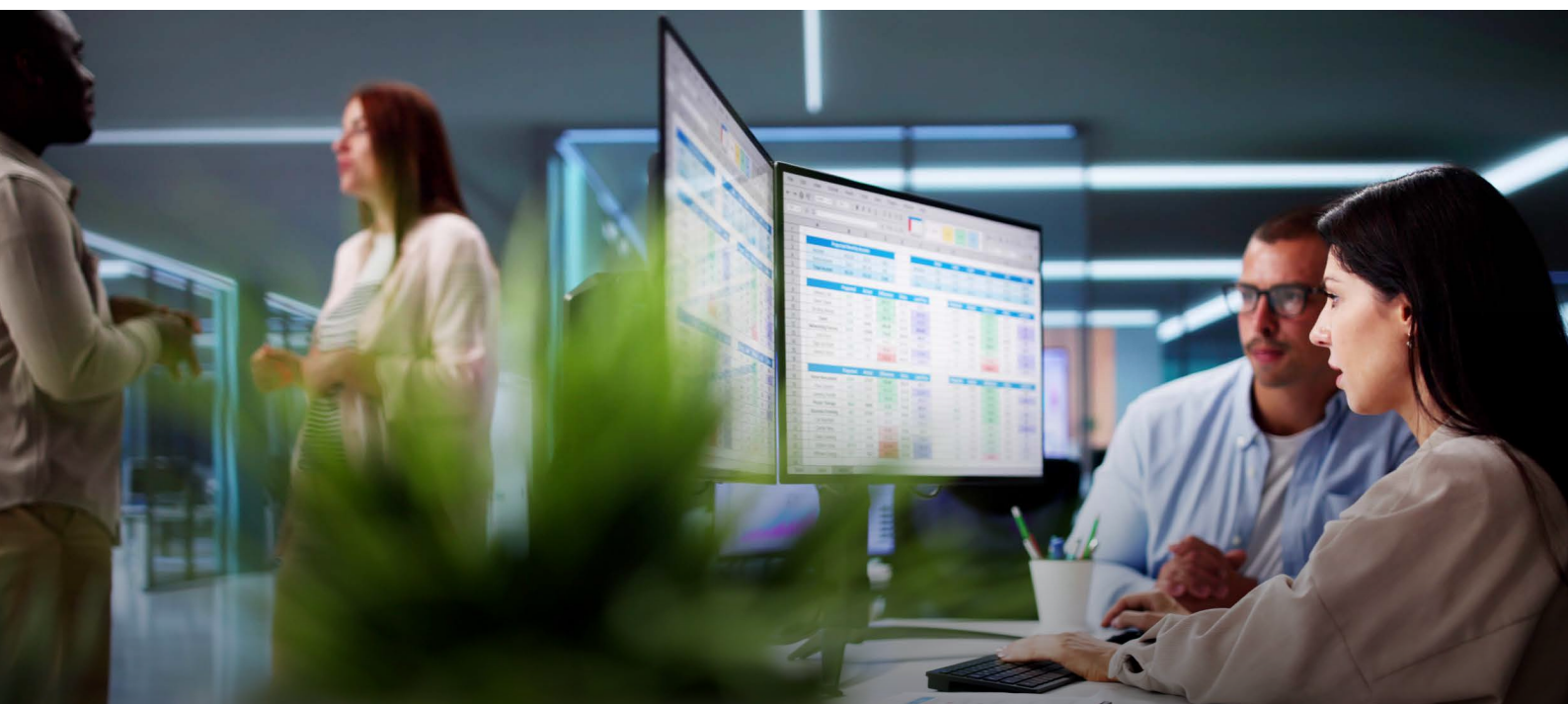
To address these challenges, Capgemini and Sayari have collaborated to develop state-of-the-art screening intelligence for financial institutions. Our solution combines Sayari's advanced risk management and corporate transparency platform with Capgemini's deep expertise in financial services to deliver a comprehensive, efficient, and scalable compliance platform. By leveraging data-driven technology and streamlined workflows, our solution enables institutions to enhance compliance, reduce costs, mitigate risks, and improve customer trust, all while staying ahead in an increasingly complex regulatory landscape.

Our solution offers unparalleled data coverage spanning 250+ jurisdictions and 6.65 billion records. By leveraging features such as seamless API integration, automated entity resolution, and access to court-admissible documentation, financial institutions can significantly enhance their compliance with global regulations. These capabilities help reduce false positives and improve operational efficiency, ensuring a more streamlined and effective compliance process.

The Sayari platform integrates multiple external sanctions data sources, including consolidated lists (e.g., OFAC, UK, and EU sanctions lists), country-specific lists (e.g., Ukraine, Poland, Czech Republic), and proprietary datasets (e.g., OFAC 50 percent rule, controlled by sanctioned, military end use). A full list of external data sources is available [here](#).

This data is provided to a range of key stakeholders, including regulators, the intelligence community, and law enforcement. These parties access Sayari's data and risk factors through various channels including the SaaS User Interface (UI), API and bulk data files, while others deploy Sayari's platform privately to integrate proprietary data and uncover additional sanctions risks. These capabilities allow organizations to screen for non-obvious risks required by regulators but are not captured in traditional sanctions lists. Sayari's true value lies in its ability to analyze billions of records of corporate and trade data, then connect the data across jurisdictions and languages, offering a more dynamic and investigative approach to sanctions compliance.

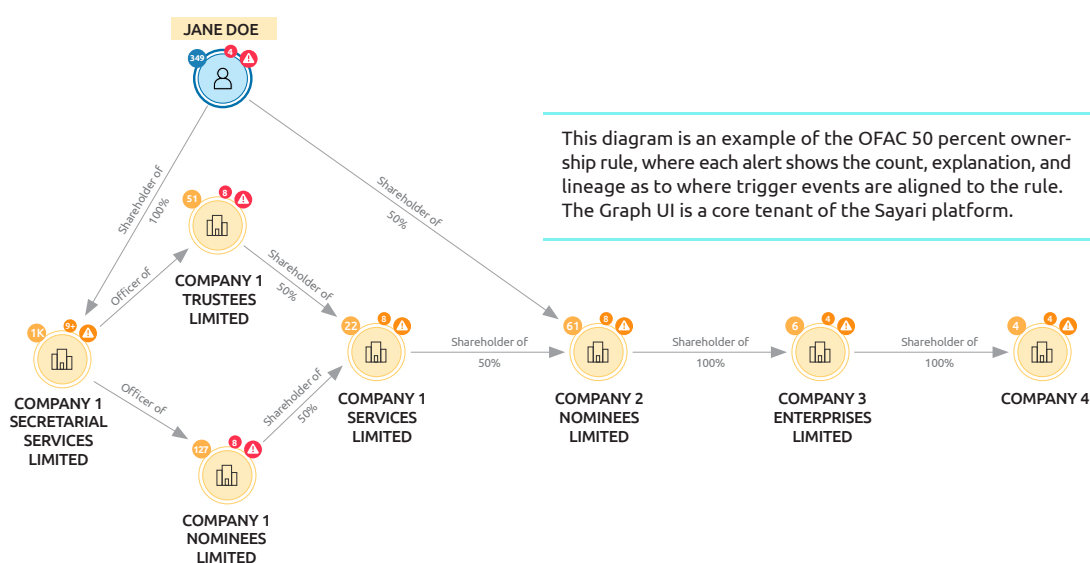
It is important to recognize that regulatory frameworks are evolving to enforce risk where formal lists do not exist. Governments may not provide comprehensive lists—or may only offer incomplete versions—when it comes to areas such as the OFAC 50 percent rule, control structures, military end use, and diversion risks. As a result, effective sanctions compliance requires a broader approach that moves beyond reliance on static lists and incorporates deeper intelligence-driven risk analysis.





## Solution capabilities that address OFAC regulatory requirements

- **Comprehensive global data coverage:** Dataset consisting of over 6.65 billion records describing 706 million companies and 722 million people across 250+ jurisdictions.
- **Sanctions watchlist enrichment:** Access and integrate global watchlists with dynamic data feeds, eliminating human intensive screening on a follow-the-sun framework.
- **Sanctions list and ownership screening:** Screen entities against global sanctions lists while resolving ownership and control complexities with advanced tools.
- **OFAC 50 percent rule compliance:** Provides entity ownership structures with 50% or greater ownership across the same or different entities, supporting blocking logic, alert generation, and penalty assessment scenarios.



- **Real-time risk assessment:** Leverage pre-computed risk factors, such as ownership and control risks, to maintain compliance with regulations like OFAC's 50 Percent Rule or BIS Export Control regulations.
- **Accurate screening of key entities:** Efficiently screen Related Parties (RP), Politically Exposed Persons (PEP), and Beneficial Owners (BO) via single-click drilldown functionality, enabling detailed ownership mapping and control analysis to trace nested partial-to-wholly owned entity structures.
- **Support for third-party and non-customer screening:** Automate due diligence for intermediaries and non-customers, effectively managing risks associated with third-party relationships.
- **Import and export control:** Track and analyze supply chain and customer order flows to identify trigger events, including cross-border activities, high-risk territories, involved parties, and payments, enabling comprehensive risk assessment and monitoring.
- **Real-time transaction monitoring:** Enable always-on transaction monitoring with blocking capabilities and pre-alerts to safeguard complex, high-risk cross-border financial activities involving sanctioned entities under U.S. Persons regulations.

## Solution capabilities that address OFAC regulatory requirements

- **Opaque jurisdiction coverage:** Access data from 250+ jurisdictions, including challenging regions such as China, Russia, North Korea, Syria, Crimea, Iran, Venezuela, Cuba, the Caribbean and other high-risk countries to streamline global sanctions compliance.
  - **Reduction in false positives:** Access data on over 2.5 billion entities to disambiguate names or relationships causing alerts. Leverage data to build expanded whitelists to proactively reduce false positives that burden compliance teams.
  - **Intuitive visualizations:** Explore and analyze complex commercial relationships using intuitive graph-based visualizations, making hidden risks in networks more apparent.
  - **Precomputed networks:** Expedite investigations with access to pre-built networks that enhance speed and accuracy.
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- **API integration:** Enhance existing workflows with flexible Application Programming Interface (API), thereby reducing manual interventions and repetitive clerical tasks to drive efficiency and reduce customer friction.
  - **Specialized file integration:** Integrate custom enhanced lists (e.g., OFAC 50, MEU, SOE) into existing screening infrastructure.
  - **Data lineage and traceability:** Provide timestamped, evidentiary records to meet regulatory requirements for audit traceability and evidence supporting regulatory exams.

## Solution comparison

	Core list screening	OFAC 50	Trade-based export control	Non list-based regulation screening (e.g., UFLPA/MEU)	Network risk (e.g., control risk/ owned by SOE)	Comprehensive commercial intelligence (compare bad actors with remaining universal entities)
Sayari	✓	✓	✓	✓	✓	✓
Vendor 1	✓	✓	✗	✗	✗	✗
Vendor 2	✓	✗	✗	✗	✗	✗
Vendor 3	✓	✗	✗	✗	✗	✗
Vendor 4	✓	✗	✗	✗	✗	✗
Vendor 5	✓	✓	✗	✗	✗	✓

Full industry benchmarking has been performed and is available upon request.

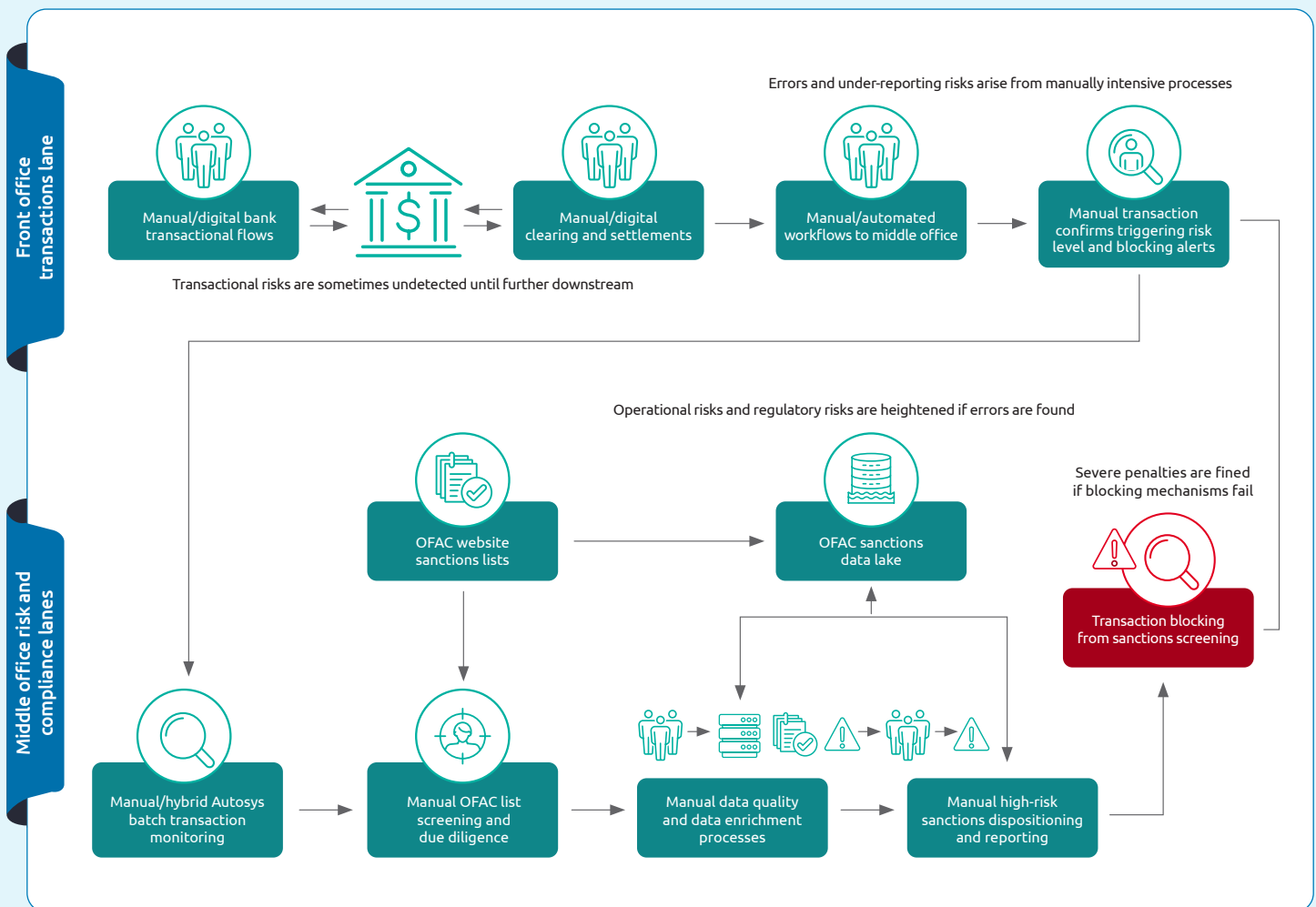


# From manual BAU processes to modern sanctions screening

Transforming from a BAU sanctions screening process to a streamlined system powered by our new OFAC sanctions screening solution marks a significant shift in compliance efficiency and effectiveness. Traditional hybrid workflows, often reliant on outdated and patchwork technologies, create inefficiencies, errors, and compliance risks, negatively impacting profitability, market share, customer confidence, and institutional reputation. These legacy processes, designed to perform “halfway” compliance, are unsuited for today’s high-speed digital transaction environment.



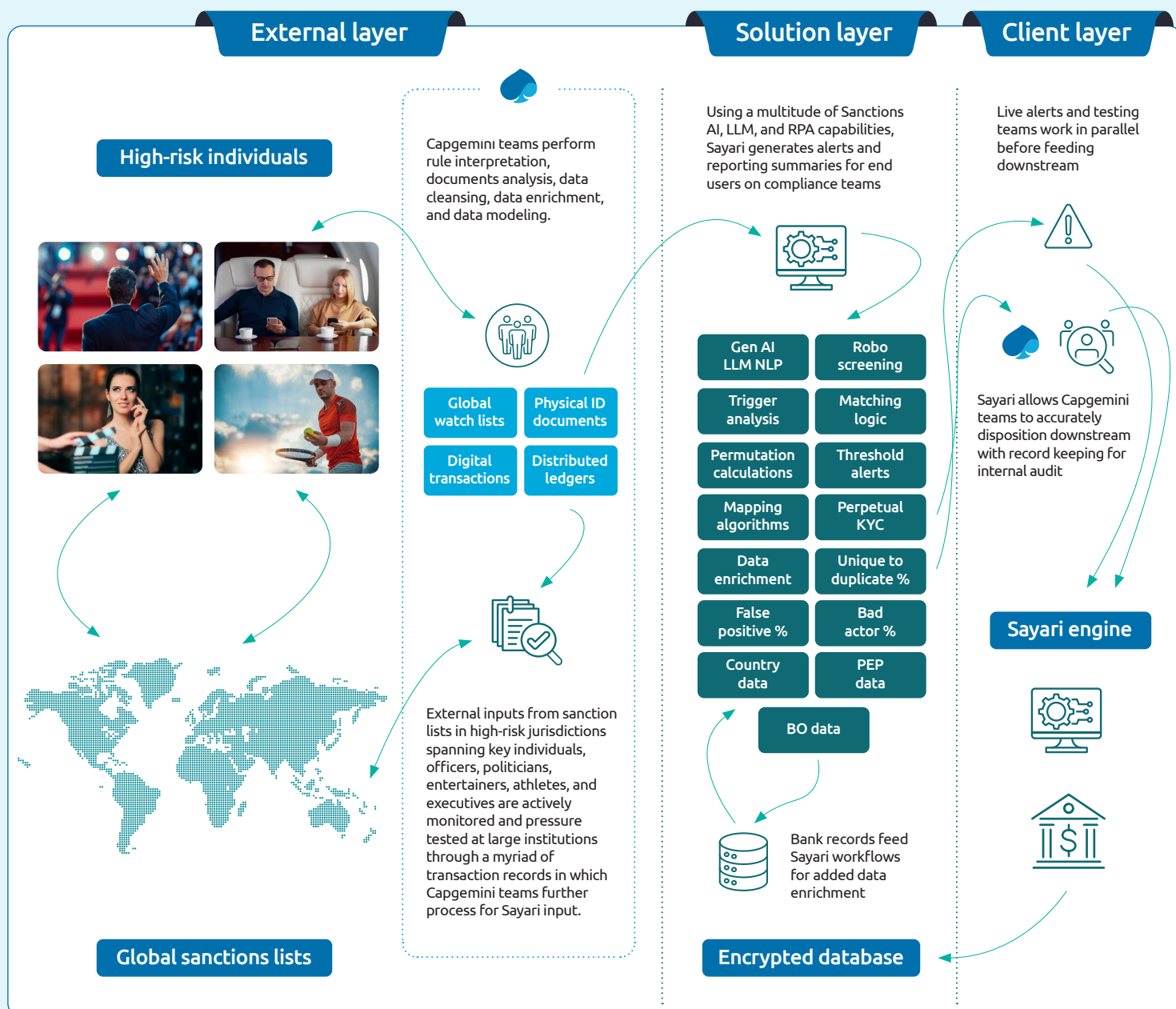
## AML sanctions – manual BAU process



By implementing our OFAC sanctions screening solution, institutions can leverage advanced machine learning algorithms alongside intelligent real-time data modeling. This transformation reduces manual interventions and enhances screening precision, ensuring compliance while

mitigating operational bottlenecks. The result is a more efficient, accurate, and proactive sanctions screening process that not only safeguards compliance but also strengthens organizational trust and competitiveness in the market.

## AML sanctions – Capgemini and Sayari solution





# Operationalization through value-added integration

Certain operational workflows remain essential to the end-to-end compliance process, and our approach ensures these are seamlessly integrated with digital tools to deliver superior outcomes. By harnessing the expertise of data scientists and regulatory operations subject matter experts, we strategically align teams with critical areas of OFAC regulatory compliance. This includes developing robust rules engines and employing precise data cleansing accelerators to prevent the common “garbage in, garbage out” pitfalls.

Our value-added integration capabilities ensure that the operationalization process aligns

current workflows with a future-focused target operating model. By defining clear roles and responsibilities, we optimize resource allocation and drive maximum results while minimizing the risk of external penalties.

The success of our approach lies in solid governance, strategic resource management, and the computational power of Sayari’s advanced commercial risk intelligence platform. Together, these elements transform traditional risks and inefficiencies into opportunities for streamlined, future-ready operations.



# Development and implementation roadmap

The implementation of our sanctions screening solution is a tailored and collaborative process designed to meet the unique needs of each organization. By starting with a detailed assessment, we develop a customized roadmap that aligns with the organization's compliance goals, OFAC regulatory requirements, and OFAC policies and procedures. This personalized approach ensures that every aspect of the development and deployment process is optimized for an organization's infrastructure and business objectives.



## Discovery and planning

- Conduct a thorough assessment of the current sanctions screening framework to identify gaps in compliance and efficiency.
- Develop a tailored implementation roadmap that aligns with institutional objectives and requirements.



## Deployment

- Deploy the solution using the most suitable delivery method based on infrastructure requirements.
- Establish seamless data integration, connecting the platform to payment systems and compliance workflows.



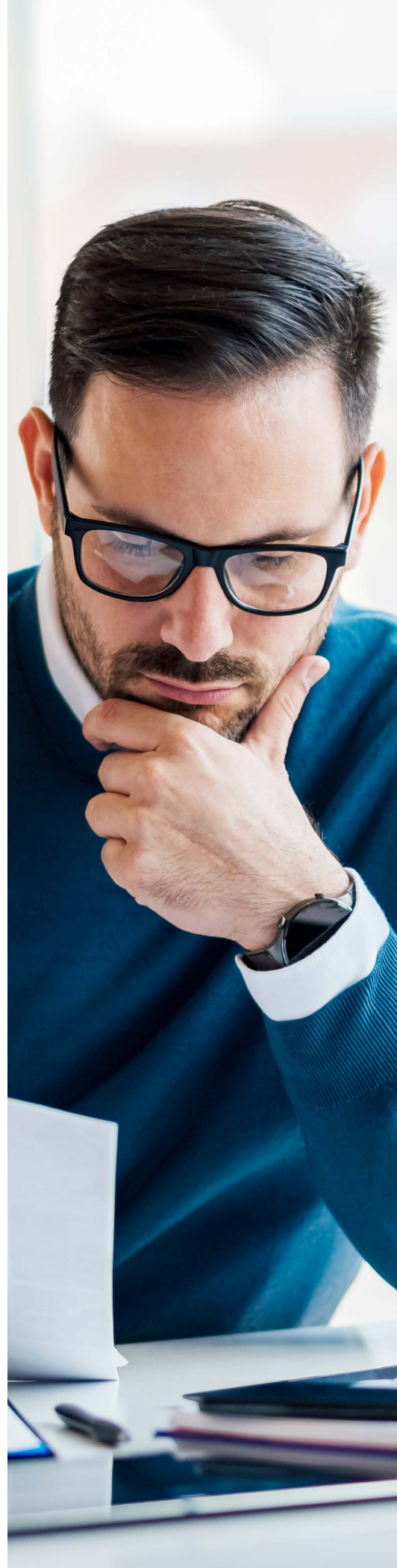
## Training and adoption

- Provide comprehensive hands-on training to compliance teams for effective platform use.
- Oversee change management, including user onboarding and interface customization, to facilitate smooth adoption.



## Go-live and optimization

- Activate the solution across key operational areas with close monitoring to ensure smooth operations.
- Track performance metrics and implement iterative enhancements based on end-user feedback and changes in the regulatory landscape.





# Case study

## How a multinational bank improved compliance, efficiency, and customer satisfaction in just 10 days



An American multinational bank operating in over 100 countries faced inefficiencies in its sanctions alert dispositioning process as rapid growth in the payments market increased transactions with non-customer third parties requiring real-time screening. Reliance on a legacy data provider hindered compliance with OFAC's 50 Percent Rule, elevated operational costs, and caused payment delays, impacting customer satisfaction. The manual, analyst-dependent screening process for non-customers and difficulty sourcing ownership data on SDNs further heightened compliance risks and delays.

### Our solution

The bank successfully implemented our sanctions screening solution across four global regions within just 10 days. Key components of the solution included:

- **Comprehensive data coverage**  
Access to the world's most extensive collection of trade and public data, with robust jurisdictional coverage in critical regions.
- **Advanced entity resolution**  
High-confidence corporate network insights enabled by an advanced entity resolution engine for faster and more accurate identification.
- **Official documentation**  
Analysts gained in-platform access to evidentiary records, providing traceable, court-admissible documentation to substantiate compliance decisions.
- **User-friendly implementation**  
Comprehensive hands-on training for 100 payment operations analysts ensured quick onboarding, while the intuitive user interface significantly enhanced usability and efficiency.

### Benefits delivered

The bank realized transformative operational improvements following the implementation of our solution:

- **Increased efficiency**  
Analysts reported faster identification of sanctioned parties using OFAC numbers and enhanced ownership data coverage.
- **Higher utilization**  
Solution usage quadrupled in the first month, effectively reducing reliance on outdated legacy systems.
- **Cost savings**  
Automated processes drastically reduced manual workload, lowering operational costs.
- **Improved customer satisfaction**  
Faster payment processing and fewer delays improved the overall experience for non-customer third parties.

# A smarter, faster path to compliance and efficiency

The challenges of OFAC sanctions screening in financial services are more pressing than ever, with regulatory complexities, false positives, and fragmented data sources straining operational teams and hindering growth. These inefficiencies not only increase compliance costs but also jeopardize financial stability and customer trust. Our sanctions screening solution addresses these critical issues head-on, offering a comprehensive platform that enhances compliance, reduces operational bottlenecks, and accelerates payment processes.

By leveraging Sayari's cutting-edge commercial risk intelligence platform and Capgemini's deep expertise in implementing transformative technology solutions for financial services, we deliver a tailored approach to meet the unique needs of each organization. From seamless data integration and automated workflows to hands-on training and ongoing optimization, our solution empowers financial institutions to confidently navigate an increasingly dynamic regulatory landscape.

Now is the time to modernize your sanctions screening process and position your organization for long-term success. Contact us today to discover how we can help your organization overcome sanctions screening challenges and build a competitive edge.

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## Data-powered financial services

Contact us to learn how we can help your organization harness the power of data using AI, machine learning, process automation, and more.

[fsid@capgemini.com](mailto:fsid@capgemini.com)

## Endnotes

1. <https://risk.lexisnexis.com/insights-resources/research/true-cost-of-financial-crime-compliance-study-for-the-united-states-and-canada>



## About Capgemini

Capgemini is a global business and technology transformation partner, helping organizations to accelerate their dual transition to a digital and sustainable world, while creating tangible impact for enterprises and society. It is a responsible and diverse group of 340,000 team members in more than 50 countries. With its strong over 55-year heritage, Capgemini is trusted by its clients to unlock the value of technology to address the entire breadth of their business needs. It delivers end-to-end services and solutions leveraging strengths from strategy and design to engineering, all fueled by its market leading capabilities in AI, cloud and data, combined with its deep industry expertise and partner ecosystem. The Group reported 2024 global revenues of €22.5 billion.

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## About Sayari

Sayari is the counterparty and supply chain risk intelligence provider trusted by government agencies, multinational corporations, and financial institutions. Its intuitive network analysis platform surfaces hidden risk through integrated corporate ownership, supply chain, trade transaction, and risk intelligence data from over 250 jurisdictions. Sayari is headquartered in Washington, D.C., and its solutions are used by thousands of frontline analysts in over 35 countries.

To learn how Sayari powers safer global commerce, please visit [sayari.com](http://sayari.com)

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