

PILLAR 1

Collaboration

The success of TMNL depends on the level of collaboration with the individual banks to detect potentially unusual transaction patterns. In addition, TMNL works together with chain parties, such as the Financial Intelligence Unit (FIU) and the Anti Money Laundering Centre (AMLC). This collaboration enables the parties to apply greater focus in their search for suspected money-laundering and leads to more effective use of public funds.

Which banks founded TMNL, and why?

TMNL is a collaborative effort by ABN AMRO, ING, Rabobank, Triodos Bank and the Volksbank. Through TMNL, the banks monitor their payment transactions within a larger context to identify patterns that may indicate money laundering or terrorism financing activities.

Does TMNL work together with public parties?

Yes; to increase its effectiveness, it is crucial that the chain parties share information and collaborate closely together. Because they can only stay ahead of the criminals within the bounds of the law through intensive collaboration. TMNL can play a central and active role in this by bringing experts at public parties together with experts within TMNL and the participating banks.

How does TMNL collaborate with the Financial Intelligence Unit the Netherlands (FIU)?

The FIU is an important partner for TMNL. We work closely together with the experts from the banks and the FIU to identify issues such as risk indicators for money laundering. TMNL makes good use of these risk indicators and this knowledge about criminals' modus operandi for money laundering to develop models that can recognise potential signals of money laundering in the banks' customers' transaction patterns.

To what extent does TMNL contribute to the Financial Expertise Centre's goals (FEC)?

The FEC's overarching objective is to reinforce the integrity of the financial sector. To that end, the FEC encourages collaboration and information exchange between public and private partners in the chain. TMNL can be seen as an important private initiative that contributes to the same objectives. This private initiative looks for ways to collaborate with a variety of FEC parties in order to further strengthen the collaboration.

Is TMNL subject to supervisory activities?

TMNL is not under the direct supervision of the AFM and/or DNB, because TMNL is not a financial institution. The member banks are of course under official supervision, and have agreed that TMNL must comply with the same regulations. The banking supervisory bodies pay active attention to the creation and operation of TMNL.

TMNL has five main pillars that form the basis for everything it says and does.

[Read more on tmnl.nl](https://tmnl.nl)