SOMESH KUMAR JHA

AML & FINANCIAL CRIME COMPLIANCE | SANCTIONS | L3 ESCALATION SUPPORT | KYC/ECDD | INVESTIGATIONS | PAYMENTS

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PROFESSIONAL SUMMARY

Financial Crime Compliance professional with **4 years of banking experience** across Commonwealth Bank of Australia and Societe Generale, covering sanctions/payment screening, AML transaction monitoring, KYC/CDD/ECDD, re-KYC, transactional analysis, suspicious/unusual activity assessment, UBO/beneficial ownership, SoF/SoW, PEP/adverse-media review and regulatory-reporting support. Experienced in high-volume L1 sanctions screening and **L3 escalation support** through evidence-ready case preparation, enhanced review of complex payment alerts, escalation matrices and defensible investigation narratives. Delivered **100+ ECDD/KYC reviews monthly**, **250+ sanctions alerts daily** and **1,200+ SWIFT messages weekly**, with **100% QA pass performance** and a **zero-breach audit record**.

CAREER HIGHLIGHTS

- **Sanctions & L3 escalation:** reviewed **250+ cross-border payment alerts daily** and supported **L3 sanctions escalation workflows** by preparing complex cases with payment-chain analysis, screening rationale, risk indicators and evidence for enhanced review.
- **AML investigations:** reviewed customer/account and payment activity for unusual or potentially suspicious behaviour, performed transactional analysis, identified red flags and supported **SMR/UMR assessment** and escalation pathways.
- **KYC / ECDD:** conducted high-risk KYC, CDD/ECDD and re-KYC across individuals and corporate entities, including UBO/ownership, SoF/SoW, PEP and adverse-media assessment.
- **Controls & improvement:** maintained **100% QA pass performance** and **zero-breach audit record**; contributed a process-improvement idea selected for implementation and automation.

PROFESSIONAL EXPERIENCE

COMMONWEALTH BANK OF AUSTRALIA (CBA), INDIA — APR 2025 - JUN 2026

Senior Financial Crime Associate / Analyst

- Conducted **CDD/ECDD**, **high-risk KYC onboarding** and **periodic re-KYC** for **100+** individuals and corporate entities monthly, reassessing identity, customer profile, ownership/control, UBOs, SoF/SoW, PEP exposure and financial-crime risk.
- Performed re-KYC reviews for HRA, CIC and ETZ entities; analysed ASIC Extracts and corroborated shareholder names, ownership percentages and control information against shareholder certificates and supporting corporate records.
- Completed and dispositioned **50+ complex ECDD cases** within **13 days** involving **transactional analysis**, **Source of Funds**, **Source of Wealth** and customer-risk assessment.
- Reviewed customer/account activity for unusual or potentially suspicious behaviour, identified red flags and supported **SMR/UMR assessment and escalation** through evidence-based investigation narratives.
- Interpreted **1,200+ SWIFT messages weekly** to trace payment flows, assess counterparties/beneficiaries and identify unusual transaction patterns and AML/CFT indicators.
- Performed due diligence on PEPs, charities, trusts and complex structures using **World-Check**, OSINT and adverse-media research; produced complete, accurate and audit-ready investigation files with **100% QA pass performance** and **zero judgement/internal errors**.
- First participant across **10 training batches** to clear the Financial Crime training pathway in **8 days** versus the typical two-month timeline; received a **Spot Award** for performance and operational impact.

SOCIETE GENERALE GLOBAL SOLUTION CENTRE, INDIA — JUN 2022 - MAR 2025

Sanctions Analyst and LEAP Core Team Member

- Analysed an average of **250+ cross-border payment alerts daily** against **OFAC, EU, UN** and local sanctions watchlists, assessing names, counterparties, beneficiaries, countries, payment fields and screening logic to distinguish true risk from false positives.
- Operated within an **L1-L2-L3 sanctions escalation framework**: performed frontline alert adjudication, documented the evidentiary basis for escalation, and prepared cases potentially requiring **L3 review** with clear screening rationale, payment-chain context, sanctions nexus and risk indicators.
- **Supported L3 sanctions escalation** and enhanced review by consolidating alert history, SWIFT/payment data, counterparty and geographic exposure, name-match quality, adverse information and prior disposition logic into structured, **audit-ready case narratives**.
- Applied **L3-level investigative thinking** to complex or ambiguous alerts by challenging false-positive assumptions, identifying repeat/linked activity, assessing potential AML/CFT or **fraud/payment-risk indicators**, and escalating material concerns with defensible rationale.
- Maintained **100% accuracy** and a **zero-breach audit record**; cleared **98%** of reviewed alerts within same-day cut-offs while preserving documentation quality, SOP adherence and escalation discipline.
- Proposed a **process-improvement idea** selected for implementation, resulting in **automation** of defined filters and a time-intensive payment type; coordinated with offshore stakeholders on testing, process clarification and operational updates.
- Received **YG of the Year** recognition and served on the **LEAP Core Team**, contributing executive-level progress updates and cross-functional coordination.

L3 SANCTIONS ESCALATION & INVESTIGATION CAPABILITY

- **L3 escalation support:** prepared complex sanctions/payment cases for enhanced review using complete alert lineage, screening rationale, SWIFT/payment-chain analysis, counterparties/beneficiaries, geographic risk, match quality and supporting evidence.
- **L3 case readiness:** ensured escalations were concise, evidence-sufficient and defensible, separating confirmed facts from assumptions and documenting why the case required enhanced review rather than routine false-positive closure.
- **L3-level risk judgement:** reassessed ambiguous or repeated alerts for sanctions nexus, unusual transaction behaviour, linked-party exposure, adverse information and broader AML/CFT or fraud/payment-risk indicators before downstream escalation.
- **Escalation governance:** worked with defined **L1/L2/L3** thresholds, SOPs, audit requirements and same-day cut-offs, balancing investigation depth, risk materiality, evidence sufficiency and operational SLA expectations.
- **Quality & challenge:** maintained a **zero-breach audit record** and **100% accuracy** while applying effective challenge to false-positive assumptions and producing clear narratives suitable for senior/escalation-team review.

CORE AML / PAYMENTS COMPLIANCE SKILLS

Sanctions / Screening: OFAC, UN, EU and local regimes, sanctions payment screening, alert adjudication, L1/L2/L3 escalation frameworks, L3 escalation support, complex alert review, true-risk/false-positive analysis, name/counterparty/payment review, World-Check, adverse media and OSINT.

AML / Investigations: AML transaction monitoring, transactional analysis, unusual/suspicious activity identification, red-flag analysis, SMR/UMR assessment support, investigation narratives, account/payment-flow analysis, SWIFT interpretation and escalation reviews.

KYC / Due Diligence: KYC onboarding, CDD, ECDD, periodic review/re-KYC, identity verification, PEP review, UBO/beneficial ownership, ownership & control analysis, SoF, SoW, customer risk assessment and case disposition.

Regulatory / Controls: AML/CFT controls, suspicious-transaction escalation, regulatory-reporting support, policy/SOP adherence, escalation matrices, audit readiness, evidence sufficiency, quality control and continuous improvement.

Tools / Operations: World-Check, Microsoft Excel, OSINT, GenAI-assisted research, high-volume SLA/cut-off management, stakeholder coordination, executive reporting and workflow automation.

INVESTIGATION & QUALITY CAPABILITIES

- **Transaction risk analysis:** traced payment flows, counterparties and beneficiaries across high-volume SWIFT and sanctions-review activity to identify unusual patterns, sanctions indicators and material financial-crime risk.
- **Customer risk analysis:** assessed ownership/control, UBOs, PEP exposure, SoF/SoW, adverse media and entity documentation to support risk-based KYC/ECDD decisions.
- **Escalation discipline:** documented findings, evidentiary basis and risk rationale clearly and escalated matters requiring enhanced review or downstream reporting consideration.
- **Operational judgement:** balanced investigation depth with strict SLA and same-day cut-off requirements across high-volume FinCrime queues while maintaining audit-ready records.

PROCESS IMPROVEMENT & STAKEHOLDER MANAGEMENT

- Identified screening inefficiencies and proposed an improvement idea selected for implementation, resulting in automation of defined filters and a time-intensive payment type.
- Coordinated with offshore teams on process clarification, testing feedback, implementation and operational updates to support consistent control outcomes.
- Worked with senior leadership through the LEAP Core Team, translating operational milestones and performance information into clear executive updates.

EDUCATION & CERTIFICATIONS

Bachelor of Business Administration (B.M.S.) - International Finance, Jain University, Bengaluru | Graduated 2022 | Grade 7.2/10

Certified in AML/KYC - Indian Institute of Banking and Finance (IIBF) | Sanctions Compliance Bootcamp - Udemy | Fundamentals of Financial and Management Accounting - Politecnico di Milano | Financial Markets Certification

RECOGNITION

- Spot Award - Commonwealth Bank of Australia | YG of the Year - Societe Generale | LEAP Core Team Member

Based in Bengaluru and willing to relocate to Gurugram. Portfolio: someshfincrime.netlify.app