

Stuart G. Davis

Qualifications

Experienced and seasoned global executive with over 30 years of progressive leadership roles focusing on remediating, transforming and delivering risk management and compliance programs with a focus in anti-money laundering, sanctions and associated operations.

Industry Regulatory Advocate: Currently serving as co-chair to Canada's Department of Finance Advisory Committee on Money Laundering and Terrorist Financing and Chair of the Canadian Banker's Association AML Specialist's Group advocating for regulatory change on behalf of the banking industry. Speaker at OECD, UN, FATF, Vatican and industry forums. Recent advocacy includes new Canadian regulations, advancement of public private partnerships, anti-human trafficking, and anti-child exploitation.

Winner - ACAMS Professional of the Year 2019

Winner (AML Program) – RBI's (UK) Retail Banking Security Innovation of the Year 2020

Scotiabank, Toronto Canada

2019-Present

EVP, Global Head of Financial Crimes Risk Management and Group Chief AML Officer

Global Banking Organization (35 countries across the Americas) with more than \$1.2 trillion in assets, 98K employees, and at least \$300 billion in assets under management. FCRM program reports into Risk Management, one layer from CEO and accountable to the Risk Committee of the Board with quarterly updates.

- Lead the financial crimes risk regulatory remediation and transformation efforts including new governance practices, systems infrastructures, risk assessment, investigations, and reporting processes.
- Provide industry advocacy and leadership for Canada's public private partnerships with FINTRAC on topics of human trafficking and prohibiting online child exploitation also in support of ESG goals.
- Oversee AML program budget in excess of \$300MM per annum. Delivered a 20% cost savings in first year.
- Manage a direct team of around 600+ and indirect team of 1200+ resources in matrixed structure.
- Deployed advanced technologies to reduce false positives by over 70% in sanctions / name screening via NLP techniques and modelling team. Using graph and context analytics for more advanced detection in products such as capital markets.
- Increased employee engagement scores by over 8% in first year.

Bank of Montreal / BMO Financial Group, Toronto Canada

2013-2019

SVP, CAMLO – Global Chief AML Officer

Global Banking Organization with more than \$800 billion in assets, 47K employees, and at least \$300 billion in assets under management. AML Program reports under risk management, one layer from CEO.

- Led the global AML organization with activities Canada, United States, Europe and Asia across Capital Markets, Correspondent Banking, Personal and Commercial Banking and Wealth Management.
- **Delivered a full AML Program regulatory remediation & sustainability initiative with over 1000 regulatory milestones resulting in the lifting of two regulatory formal actions in three years.**
- Regulatory relationships included OSFI, FINTRAC, OCC, Fed IL, NY, NYDFS, MAS, HKMA, FSA
- Held full accountability for program strategy including AML technology, resources including staffing and funding, and project portfolios and execution within a \$100MM annual budget.
- Directly accountable to the Audit and Conduct Committee (ACRC) of the Board with quarter briefings and in-camera discussions. Active participation in several executive oversight committees including Compensation Oversight Committee and various risk committees and the AML Operating Committee (CEO and directs).
- Facilitated direct customer discussions to support business growth and screening of high-risk customer types including virtual currency, medical cannabis, and money services businesses.
- Managed rapid growth in size AML Program team (600+) and commensurate technology overhaul to achieve sustainability. Now focused on efficiency gains through technology enhancements.
- Recognized business growth enabler balancing customer experience and customer risk.
- Consistently received high employee engagement scores.

USAA, San Antonio Texas

2008-2013

Assistant Vice President (Executive), Enterprise AML Officer, Enterprise OFAC Officer, BSA Compliance Officer
Integrated Banking, Mutual Fund, Brokerage and Insurance Company with over 13 million customers based in San Antonio, Texas.

- Provided strategic leadership, compliance and regulatory risk oversight and tactical operational delivery of an integrated enterprise wide integrated AML/OFAC program through a combined “Center of Excellence”.
- Set strategic direction and provide project sponsorship for an annual \$12 million portfolio of numerous AML, Sanctions (OFAC) and Customer Due Diligence technology solutions and data efforts. Driving solutions for detection, risk management, reporting and workflow project solutions supporting an integrated AML & Fraud risk mitigation program.
- Implemented compliance capabilities to support corporate growth and deliver new AML / OFAC / KYC functions for first-mover digital products like Deposit@Mobile and core banking products through internet, mobile and other customer channels.
- Five years of successful exam & audit outcomes: OCC, Fed, FDIC, SEC, FINRA.
- Active role in several governance committees and chaired an AML focused compliance committee.
- Provided briefings to top executives and various Boards of Directors, on strategy and emerging issues.
- Set compliance and risk requirements for new customer products and information technology initiatives.
- Recognized as a strong business partner and a high potential employee.
- Sponsored several projects which have been the recipient the IT Quality Cup award.
- Lead a team of up to 63 AML & OFAC Staff.

Western Union / Formerly First Data Corporation

2006-2008

Vice President, Global AML Programs, Products and Risk

Global Money Service Business with presence in 210+ countries, over 350,000 agent locations and over 275 dedicated AML staff. Responsibilities include leading core aspects of Western Union’s Global AML program:

- Designed and implemented global AML standards for Mobile Money Transfer with major international carriers. This is anticipated to be a significant business opportunity for Western Union.
- AML global policy and procedure development.
- Directed the creation of Western Union’s global AML risk assessment. Including a very innovative product and geographic risk model given our global presence.
- Enterprise Risk Assessment oversight for the global AML compliance organization.
- AML business liaison for all Commercial Payments Products and negotiated compliance and risk agreements for several major client relationships both domestic and international.
- Motivated Western Union’s reentry into the prepaid card loading business by establishing an innovative prepaid risk management program enabling \$3 million in revenue.
- AML training programs – global content development and deployment for agents & employees. Including system implementation and global deployment of courses in nine languages.
- Oversight of North American AML Regulatory Exam & Audit coordination and response efforts. Including 30+ state exams per year for three companies.
- AML line of business oversight for all payment services. (240+ million transactions per year).
- Lead AML evaluations for significant mergers & acquisitions efforts.
- Conducted AML Enhanced Due Diligence review for international commercial clients.
- AML Risk Analysis and policy creation for all product development efforts.
- Two patents pending for risk management and risk scoring processes.

Capital One Financial Corporation

2003-2006

Enterprise Risk Management/ Compliance, AML/OFAC Executive

Responsible for the enterprise-wide Bank Secrecy Act / Anti-Money Laundering (BSA/AML) and Office of Foreign Asset Control (OFAC) compliance program for Capital One Financial Corporation and its subsidiaries (\$83 billion in managed consumer loans not including Hibernia) and Capital One Bank (Canada). Directed a team of six professionals in BSA/AML.

- Implemented compliance program governance including ongoing review and development of policies and procedures, standards, and comprehensive reporting (SARs/STRs, 314, OFAC/OSFI, CIP)

- Promoted comprehensive AML annual enterprise training programs including computer based training, targeted training, executive training and Board level training.
- Conducted BSA/AML due diligence on new products, services and acquisition integration efforts while carefully evaluating business profitability and regulatory constraints.
- Directed project teams in matrixed environment through the implementation of corrective actions, BSA/AML examination and audit preparation, consultant reviews, risk self-assessments and special projects.
- Promulgated process improvements, service level agreements and monitoring initiatives.
- Provided BSA/AML consulting and compliance advice for the consumer products and services.
- Managed BSA/AML annual planning, strategic initiatives, and consulting and technology budgets.

Manager, Regulatory Examinations, Enterprise Risk Management

Responsible for coordination and corporate-wide management of regulatory examinations conducted by the Federal Reserve, OTS and other agencies. Managed examination preparation across Capital One's departments and affiliates. Responsibilities included consulting with lines of business on exam readiness, regulatory exam preparation, training, issue resolution, and overall risk management practices. Areas of specialization include Safety & Soundness, AML/BSA, Consumer Compliance and Canada. Coordinated eight regulatory exams.

Bank of America

2000-2003

Vice President, Risk Management

Portfolio Analysis Manager for the Small Business Lending and other commercial credit products. Led team in the monthly production of enterprise-wide reporting and analysis. Directed reporting efforts to consolidate many disparate data-repositories using Business Objects for executive management; provided oversight and reporting for the monthly integrated risk-based analysis on the loan portfolio and emerging trends for executive management, regulatory bodies, and other business partners.

Audit Manager for Bank of America's multi-year \$1.1 billion personnel outsourcing strategic alliance. Responsible for audit/risk-based consulting on all phases of the transition including due-diligence, operations, system conversions and overall project management. Provided ongoing advice for risk mitigation and process improvements. Directed an audit team through several core-corporate audits including Procurement, Real Estate Services, Benefit Plans, Finance and Corporate Affairs.

- Contributed to the successful implementation of over 15 significant projects within the outsourcing alliance including establishing a network and consolidating Call Centers.
- Conducted risk-based assessments of operational risk and ongoing reviews of best practices, implemented solid governance processes and effective change management controls.

First Union National Bank

1992-2000

Associate Director & Vice President, Alternative Investments-HedgeFunds

Chief Administrative Officer for five start-up hedge funds and two private equity funds. Fully responsible for the oversight of fund operations, compliance and customer fulfillment serving both accredited and super-accredited investors. Directed a team of professionals in the fund general partner and business unit accounting, the client servicing activities, hedge fund creation including policy, procedure and process development and the implementation of investment decisions. Managed fund compliance activities including audits and regulatory examinations. Implemented additional strategic initiatives for the Bank's alternative investment program and negotiated contractual relationships with external investment partners and service providers.

- Developed policies and procedures and ensure compliance with applicable laws and regulations.
- Integrated business processes to support a substantial growth rate in sales and new fund offerings.
- Managed over \$300 million in assets with more than 70 external managers and 350 clients.

Compliance Officer, Assistant Vice President

Developed the compliance and risk management program for trust and mutual fund investment advisory services, employee benefit compliance, and regulatory reporting. Managed compliance activities during six major acquisitions and periods of rapid growth, product integration and consolidation, and complex project initiatives including derivative contracts. Developed and implemented database management information systems used for risk management, regulatory reporting, and budgeting and profitability studies.

- Implemented the Know Your Customer policies for the Capital Management Group.

- Coordinated OCC and SEC examinations of the Bank Trust and Investment Department.
- Advised on compliance and legal issues pertaining to new product development.
- Provided systems and technology leadership for the Compliance Department.

Office of the Comptroller of the Currency (OCC)

1990-1992

Associate National Bank Examiner

Conducted activities necessary for the supervision and regulation of national banks. Responsible for general safety and soundness examinations including consumer, commercial, and trust banking products and services.

Boards, Industry Roles, Presentations, Papers and Certifications

Recent

- Co-Chair ACMLTF – Department of Finance Canada 3-year appointment since 2018
- Chair Canadian Bankers Association AML Specialist’s Group (industry association) since 2017
- Speaker IIF – Emergence of Public Private Partnerships 2019 Washington DC
- Speaker – Pontifical Academy of Sciences Vatican Nov 2019 Italy
- Moderator – RUSI /FFIS Symposium on Global Practices Public Private Partnerships 2019 – Netherlands
- UN Blueprint to end modern slavery NY – Lead bank for Canada in FAST Pilot 2019
- Testimony to House of Commons- CA Finance Subcommittee on PCMLTFA
- Board of Governors, Junior Achievement-Ontario since 2016
- Board and Chair, Toronto Chapter ACAMS since 2014, 300+ Members
- Co-Chair Speaker at ACI Sanctions Conference Oct 2016
- Speaker United Nations Summit on Identity at the UN (ID2020) May 2016
- Speaker Transparency International Financial Summit on Corruption – Toronto 2015

Other

- Speaker OECD July 2018 – Emergence of Digital assets, KYC Passporting, and Stable Coins.
- Speaker SecOps – Toronto 2018 on Virtual Currency and ICO regulatory considerations
- Speaker OpsRisk-NY 2018 (blockchain and virtual currency)
- Speaker Oracle Financial Industry Conference 2017,2018
- Board ACAMS Austin Chapter 2011-2013
- Speaker at various technology forums on Financial Crime 2013-2016
- Speaker ACAMS Toronto 2014
- Speaker/Educator AML Model Validation ACAMS International Forum 2014,
- Speaker Gulf-Coast AML Forum 2011, 2012
- Speaker FFIEC Regulator Conference, Washington DC 2009
- Speaker West Coast Anti-Money Laundering Forum Oct 2007 (Prepaid Cards, MSB Banking risks)
- Speaker ACAMS International Money Laundering Exhibition Nov. 2006 (AML Damage Control)
- Speaker ABA Anti-Money Laundering Conference Nov. 2005 (Credit Card Risk Assessment)
- Active participant in industry peer groups and associations
- ACAMS Education Advisory – 2011-12 contributor on Modeling
- Patents with both Western Union and USAA including:
8,146,805 *Systems and methods for depositing cash into a deposit account*, awarded April 3, 2012
- Certified Anti-Money Laundering Specialist (CAMS) – Since 2005
- Certified Fraud Examiner (CFE) – Since 2011
- FINRA Series 99 Operations Professional Broker-Dealer License – 2012-13

Education

University of Georgia

Magna Cum Laude with High Honors

- Bachelors in Economics with additional focus in Statistics, Finance and Accounting.
- Honors program, Phi Kappa Phi Honor Society, Mortar Board.