

Statement on inspection at Danske Leasing A/S (AML)

Introduction

In November 2024, the Danish Financial Supervisory Authority (the Danish FSA) conducted an inspection at Danske Leasing. The inspection was an inspection of the AML area and covered the company's customer due diligence measures and monitoring of customers.

Risk assessment and summary

The company offers finance and operating leases. Most of the company's finance leasing products are offered through cooperation with dealers, primarily car dealers, in which the company offers financing solutions to the dealers' and importers' customers. Moreover, the company offers real property leasing. Finance leasing is subject to the provisions of the Danish Act on Measures to Prevent Money Laundering and Financing of Terrorism (the Danish AML Act).

The company is also registered as a consumer credit undertaking and insurance intermediary because the company also provides loans and insurance to its customers.

The company's finance leasing customers constitute only 5% of the customer portfolio and comprise approximately 1,400 active business customers. The business customers must be registered in Denmark and have a Danish CVR number. The company has no personal customers with finance leasing products.

The company is part of the Danske Bank Group. The company has no employees because all activities are handled by Danske Bank functions under outsourcing agreements.

The Danish FSA assesses that the company's inherent risk of being used for money laundering or terrorist financing is medium-low. The assessment is based on, among other things, the fact that the risk that leases are used for money laundering purposes is assessed to be moderate in the Danish Money Laundering Secretariat's national money laundering risk assessment from 2022. The national risk assessment of terrorist financing in Denmark prepared by the Danish Security and Intelligence Service (PET) in 2024 states that there is a low risk that finance leases are used for terrorist financing.

The inspection has given rise to the following supervisory reaction.

The Danish FSA finds that the company has not adequately ensured that it investigated and registered the course of events and conclusions regarding the alert processing so that it is evident why the alert was generated and why the activity or transaction in question was not considered suspicious.

If the company is not sufficiently observant of its duties of investigation and registration, there is a risk that the company will overlook relevant information and matters in relation to the customer.

The company is therefore ordered to investigate all unusual transactions and activities that do not have an apparent economic or legal purpose. If relevant, the company must investigate the source of the customers' funds and ensure that the customer due diligence data is updated. In addition, the company must ensure that the investigations and conclusions are adequately registered and stored¹.

The other inspected areas did not give rise to any reactions.

¹ See section 11(1)(v) and section 25(1) and (3) of the Danish AML Act.