Quatrième étape : l'évaluation indépendante

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L'évaluation indépendante est un rapport établi par un tiers, généralement un cabinet d'audit ou un conseil spécialisé, sur l'adéquation du dispositif LBC/FT du demandeur et, pour les demandeurs DPT, de ses dispositifs de gestion des risques technologiques et de conservation. La MAS en définit le périmètre et attend de l'évaluateur qu'il teste le dispositif en fonctionnement, et pas seulement sur le papier.[1] Le rapport doit être remis avant l'approbation de principe, ce qui fait de son calendrier la source de retard la plus fréquente. Une évaluation commandée lorsque les politiques sont définitives prend deux à quatre mois. Une évaluation commandée avant que les politiques ne soient définitives aboutit à un rapport assorti de réserves et doit être refaite.

Notes

1. MAS, Guidelines on Licensing for Payment Service Providers (PS-G01), section sur l'évaluation indépendante du dispositif LBC/FT des demandeurs, et périmètre élargi pour les demandeurs DPT à la suite des modifications de 2024. ↩

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