

Transaction Monitoring Standard (v2.3)

Mittenda Limited · internal document · published as a specimen excerpt

Synthetic specimen. Mittenda Limited is a fictional firm. This document is invented, derived from scenarios seen in practice, and contains deliberate deficiencies for demonstration. It is not a template and must not be adopted.

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Version	Date	Change
2.3	November 2025	Scenario thresholds recalibrated across both rails
2.2	April 2025	Crypto-asset rail scenarios added

[Earlier versions omitted]

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- Purpose
- Monitoring universe**
- Scenarios and calibration
- Alert investigation
- Escalation and reporting
- Governance
- Appendix A: Scenario library

Sections in bold are excerpted below.

[Section 1 omitted]

2. Monitoring universe

2.1 All executed transactions, across Mittenda's payment services and crypto-asset services, are monitored against scenario-based rules calibrated to Mittenda's business-wide risk assessment. Scenarios cover, at a minimum: velocity and volume anomalies; structuring patterns; exposure to high-risk jurisdictions; and deviation from the expected activity established at onboarding.

2.2 Alerts are investigated and closed with a recorded rationale, or escalated in accordance with §5. Alert queues, ageing and disposition rates are reported under §6.

2.3 Alerts are triaged within two working days of creation. Alerts unresolved after ten working days are escalated to the Head of Financial Crime and reported monthly under §6.

[Sections 3 onward omitted]