

Compliance: reading and applying in several languages

*Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland), Solicitor (Hong Kong),
Solicitor (England & Wales)*

Since the 1990s, compliance has become one of the most populous professions of the financial centre, and one of the most demanding in linguistic terms. The sources that a Geneva compliance officer must read are written in different languages: federal acts and ordinances in French, German and Italian; FINMA circulars in the three languages, with drafts often available first in German; the sanctions lists of the State Secretariat for Economic Affairs in the official languages, and those of the United Nations, the European Union, the United Kingdom and the United States in English; the recommendations of the Financial Action Task Force in English and French; the reports of the Money Laundering Reporting Office in German and French.¹ The analysis of an African client's file draws on documents in French, the local press, reports by non-governmental organisations in English and commercial registers in the language of the country.

This plurality has practical consequences. Name-screening tools must handle transliterations between the Latin, Arabic, Cyrillic and Chinese scripts as well as the French and English spelling variants of African names. Internal procedures must be available in the working language of staff, which in Geneva means at least French and English. Mandatory training on money laundering and sanctions must be delivered in a language that each employee understands. Suspicious activity reports to MROS are drafted in an official language, most often in French in Geneva. Their drafting quality influences how the file is handled.

The cases traced in Part H showed that compliance failures rarely stemmed from language as such, but that language played a part in them. A French-language press report on an African intermediary that an English-speaking compliance team did not read; an internal document in English misunderstood by a French-speaking employee; a sanctions list in English

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whose transliterations did not match the names appearing in the French-language documents: so many gaps in which poorly organised multilingualism becomes a risk. To be effective, compliance in Geneva must be at least trilingual and have staff capable of reading the sources in their original language.

Source	Languages of publication and significance for Geneva compliance
Federal acts and ordinances	German, French, Italian; all versions equally authentic
FINMA circulars and communications	three official languages; drafts often first in German
SECO sanctions	official languages; lists aligned with those of the EU
UN, EU, United Kingdom, United States sanctions	mainly English; transliterations to be managed
FATF recommendations	English and French
MROS reports	German and French
Open sources on the African clientele	French, English, Portuguese, Arabic

1 Notes

1. Fedpol, page “Publications du Bureau de communication en matière de blanchiment d’argent (MROS)” (fedpol.admin.ch): the annual reports appear in German and French, whereas the typology reports are published only in English; FINMA, press release of 7 June 2024 on Supervisory Communication 03/2024 (finma.ch): press releases and communications published in German, French, Italian and English. ↩

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