



Bastian Schwind-Wagner

Senior AML/CFT & Compliance Advisor
(Luxembourg)

I help professionals to master AML / CFT / CPF compliance, enabling them to reduce regulatory risk, streamline processes, and defend their decisions with confidence to auditors and regulators.  **FinancialCrime.lu**

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LinkedIn: <https://linkedin.com/in/bs-w>

Nationality: German

Languages: German (native), English (fluent)

Senior specialist with 25+ years' experience in AML/CFT, compliance, data protection (GDPR), risk management and whistleblowing. Extensive senior management and board experience in Luxembourg fund management and Chapter-15 management companies. Now Managing Director of concilio et labore GmbH, providing pragmatic compliance and AML solutions to financial services.

Core competencies

- AML/CFT & financial crime prevention
- Compliance programmes, policies & governance
- Risk management frameworks & risk assessment
- Data protection (GDPR) & whistleblowing systems
- Regulatory engagement (CSSF / AED)
- External RC / AML officer & Board / Chairman duties
- Training, implementation and operationalisation of controls
- Screening; AI for fraud detection

Selected experience

- 11/2022 – present: concilio et labore GmbH (self-employed); **Managing Director**; Consulting and advisory services in AML/CFT, compliance, GDPR, risk management and whistleblowing.
- 07/2021 – 11/2023: 1741 Fund Services S.A. (Lux); **(external) RC / AML/CFT Compliance Officer**; design, implementation and oversight of AML/CFT programme; regulator contact point.
- 10/2020 – 06/2021: Alpina Fund Management S.A. (Lux); Director; Chapter-15 management company
- 04/2016 – 03/2020: Falcon Fund / Falcon Invest / Swiss World Invest SICAVs (Lux); **Chairman of the Board**; leadership, governance, oversight, regulatory representation.
- 12/2014 – 03/2020: Falcon Fund Management (Lux) S.A.; **Conducting Officer; Head of Risk; Head of Compliance**.
- 04/2008 – 11/2014: Deka International S.A.; **Head of Risk & Regulatory Compliance** (and earlier roles in fund accounting & compliance).

Selected qualifications & courses

- **Certified Anti-Financial Crime Professional (CAFCP)** – Technological University Dublin (Level 8, Honours Bachelor)
- MLRO Certification
- TÜV: **Compliance Officer; Data Protection Officer (DPO)**
- Chartered Global Sanctions Compliance Leader (CGSCL™)
- Multiple specialist courses: LSEG World-Check, AML/CFT (Luxembourg), Whistleblower Act, GenAI for Risk & Compliance, Forensic Accounting, Financial Crime investigations and analytics

Why work with Bastian? – Client benefits

- **Ready-to-deploy regulatory expertise:** Proven CSSF and Luxembourg fund experience enables immediate, compliant solutions for UCITS and AIF structures.
- Practical, business-aligned compliance: focus on implementable policies, clear processes and measurable controls – not just documentation.
- **Risk-based, proportionate approach:** frameworks and monitoring tailored to actual ML/TF risk, business model and investor profile.
- **Flexible senior coverage:** Acts as external RC / AML Officer, interim Head of Compliance/Risk, board member or Chair – scalable part-time or project engagement.
- Strong regulator & auditor interface: experienced in managing regulatory reviews, responding to findings and reducing reputational/sanction risks.
- Modern toolset & AI readiness: Experience with screening platforms and AI applications for fraud detection and efficiency gains.
- Cost effective seniority: access to decades of senior expertise without fixed employment overhead.

Representative projects

- Built group risk & compliance framework and control environment at Falcon Fund Management (Lux).
- External AML/RC Officer for fund platform (1741 Fund Services S.A.).
- Chairmanship of multiple SICAVs: governance, oversight and regulator liaison.
- Coordinated on-site inspection support.
- Remediated CSSF findings and prepared responses for supervisory review.

Related projects

Founder of **FinancialCrime.lu** – a resource hub offering practical AML/CFT guidance, case studies and tools to strengthen compliance and investigative capabilities in Luxembourg and the EU. <https://financialcrime.lu>



Flexible fee options

- Daily rate: fixed day fee for ad-hoc support, meetings or reviews.
- Day bundles: e.g. 5/10/20 days at a discounted package rate, usable within an agreed period.
- Project fixed fee: single price for defined deliverables with milestone payments and change-request rules.
- Retainer: recurring upfront payment (usually monthly) guaranteeing priority availability and a set amount of included hours/days; unused time can be handled per agreement.
- Hybrid: combines models

Availability & contact

Available for consulting and advisory mandates, interim RC / AML Officer roles, compliance roles, board mandates, GDPR / whistleblowing projects and anti-financial crime programme implementations.

Contact Bastian for a complimentary 30-minute consultation to discuss your compliance priorities and a tailored engagement plan:

Mobile: +49 171 53 56 474

Email: bsw@cetl.lu

LinkedIn: <https://linkedin.com/in/bs-w>

Selected references

- ✓ B. W., Board Member
"I worked with Bastian in my capacity as a board member and was consistently very satisfied with his work as (external) Compliance Officer and AML Officer. His deep expertise across compliance, AML/CFT, GDPR and whistleblowing was of great value. He explains complex regulatory matters clearly and provided precise analyses and well-founded decisions."
- ✓ M. B., Executive Board Member
"Mr. Schwind-Wagner acted as our Compliance and Anti-Money Laundering Officer (responsable du contrôle), initially as an employee and later as an external contractor and Managing Director of concilio et labore GmbH. He performed his duties reliably, independently and solution-oriented at all times. Thanks to his IT affinity he developed and implemented a tailored AML/CFT programme and trained staff on regulatory changes."
- ✓ T. S., Relationship Manager
"During an extensive outsourcing relationship, Bastian was responsible for AML/CFT, compliance, data protection and risk management. He demonstrated exceptional expertise and a proactive approach that ensured smooth operations and compliance. He is approachable, collaborative and an excellent communicator."
- ✓ M. M., Senior Portfolio Manager (Real Estate)
"I worked under Bastian's leadership and can praise his outstanding abilities and commitment. He managed fund risk, compliance including data protection and whistleblowing, and AML/CFT. His analytical work and risk assessments contributed to project success. His programming and automation initiatives improved process efficiency. He is an exemplary manager and communicator."
- ✓ F. R., Senior Risk Analyst
"I found Bastian to be a competent and committed expert. His regulatory knowledge and his ability to identify and mitigate risks for funds and the management company greatly supported the team."
- ✓ K. S., Risk Manager
"I found Bastian to be a highly competent, helpful and pleasant colleague."

You can find full recommendations on my LinkedIn profile:

<https://www.linkedin.com/in/bs-w/details/recommendations/>