

A Systematic Literature Review on the Roles and Ethical Dilemmas of Professional Accountant in Money Laundering

Siti Hawa Shuid^{1,2}, Ainol Sarina Ahmad Zazili^{2,3}, Zaleha Mahat^{2,3}

¹Faculty of Accountancy, Universiti Teknologi MARA Cawangan Negeri Sembilan, Kampus Seremban, Malaysia, ²Money Laundering Research Group, Universiti Teknologi MARA Cawangan Melaka, Malaysia, ³Faculty of Accountancy, Universiti Teknologi MARA Cawangan Melaka, Kampus Alor Gajah, Malaysia

To Link this Article: <http://dx.doi.org/10.6007/IJARBSS/v14-i2/20966>

DOI:10.6007/IJARBSS/v14-i2/20966

Published Date: 19 February 2024

Abstract

The "Pandora papers" and other international investigations have brought much attention to the increasing cases of money laundering activities. These revelations have led to increased scrutiny of the role of professional accountants, including their involvement in these illegal activities. Hence, the objective of this study is to investigate the roles and ethical dilemmas faced by professional accountants when dealing with cases of money laundering. Through the application of the Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA) review method, this systematic literature review identified 15 relevant articles related to the roles of professional accountants and their ethical dilemmas. These articles were published between 2017 and 2022 in the Scopus and Web of Science databases. Based on this review, four main themes were identified for the roles of professional accountants, which are: 1) enhancing knowledge and skills; 2) offering expert opinions; 3) detecting and investigating money laundering; and 4) reporting suspected cases. This study also found that professional accountants also encounter ethical dilemmas, leading them to either facilitate the crime or resign from their positions. By conducting this systematic review, this study aims to offer valuable insights to relevant stakeholders, empowering them to reconfigure and enhance the role of professional accountants in the fight against money laundering. This is particularly relevant to those involved in governance, as it aims to create a conducive environment for anti-money laundering efforts. This research also highlights strategic plans aimed at collectively preventing money laundering schemes in the future. Furthermore, this study will also provide research areas and offer valuable direction for future studies.

Keywords: Systematic Literature Review, Professional Accountant, Money Laundering, Roles, Ethical.

Introduction

Money laundering has been viewed as an international threat as it facilitates organised crime and jeopardises the integrity and security of the financial system (Sittlington & Harvey, 2018). It involves the process of concealing the origins of the proceeds of criminal activities in order to hide their suspicious source (Mohammadi et al., 2020). The rapid advancement in technology and the globalised economy have heightened attention to money laundering activities. Business operations and transactions have become more complicated as a result of the simultaneous introduction of numerous new financial instruments into the financial market (Repousis et al., 2019).

Consequently, these challenges often make the money laundering schemes difficult to detect, placing the responsibility for identifying and reporting on the shoulders of professionals. Even more concerning, professionals operating in regulated sectors, such as accountants, are vulnerable to the interest of professional money launderers (PMLs) who exploit accountants for their crime activities (The Association of International Accountants, 2023). Significantly, the exposure of the "Pandora papers" and other international investigations have highlighted the increasing severity of money laundering risks. These revelations scrutinised the role played by professional accountants, even in carrying out illegal actions like money laundering. The pervasive practice of "wilful blindness" has hindered professionals from taking responsibility for seeking out relevant and adequate knowledge (Murray, 2018). In this critical context, the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL) (2022) asserts that professionals may be involved in major global money laundering activities committed by politicians and high-net-worth individuals (HNWIs). Their aim is to evade taxes through the manipulation of offshore jurisdictions and complicated corporate structures. The question is whether professional accountants have upheld the requirements for upholding public trust by exercising professional qualities and ethics. The professions are subject to accusations that they have not done enough to prevent money laundering for the betterment of the societies they serve. Previous studies have focused on the roles and obligations of white collar 'gatekeepers' and designated non-financial business and professions (DNFBP), which particularly comprise professions such as lawyers, accountants, real estate agents, trusts, and company service providers in fighting against money laundering schemes (Omar et al., 2016; Tuch, 2016). While there are many previous studies that concentrated on these specific groups, there remain insufficient studies that systematically reviewed studies that specifically focused on professional accountants, particularly accountants and auditors. This study aims to contribute to the existing body of knowledge by conducting a systematic literature review on the role and responsibilities of professional accountants as well as the ethical dilemmas they encounter concerning money laundering risks. On the basis of this premise, the objective of this study is to review previous studies systematically in order to enhance understanding of the role and responsibilities of professional accountants and the ethical dilemmas they faced in fighting against money laundering. The review follows the Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA 2020) statement as a framework. The systematic literature review proposed in this study incorporates integrative review analysis, where quantitative, qualitative, and mixed methods are combined.

The study offers several significant contributions to both practical applications and the body of knowledge. It will help relevant stakeholders gain a better understanding of the roles of professional accountants in fighting against money laundering risks, enabling them to reconfigure and enhance these roles. Additionally, this study highlights strategic initiatives

designed to prevent future money laundering schemes. Moreover, this study will also identify research areas and provide valuable guidance for future studies.

Methodology

The study was carried out using the guidelines provided in the Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA). The PRISMA statement offers updated reporting guidance for systematic reviews, incorporating advancements in methodologies to identify, select, evaluate, and synthesise studies (Page et al., 2021). This statement facilitates a rigorous search for literature related to the roles and ethical dilemmas of professional accountants in fighting against money laundering. To identify relevant articles related to the research objective, a literature search was conducted using two databases: Scopus and Web of Sciences. These databases have systematic search capabilities and encompass broader coverage of high-quality articles (Gusenbauer & Haddaway, 2020). The PRISMA procedure was applied, encompassing three primary systematic search steps: identification, screening, and eligibility (refer to Figure 1). Subsequently, the researchers proceeded with data extraction and analysis.

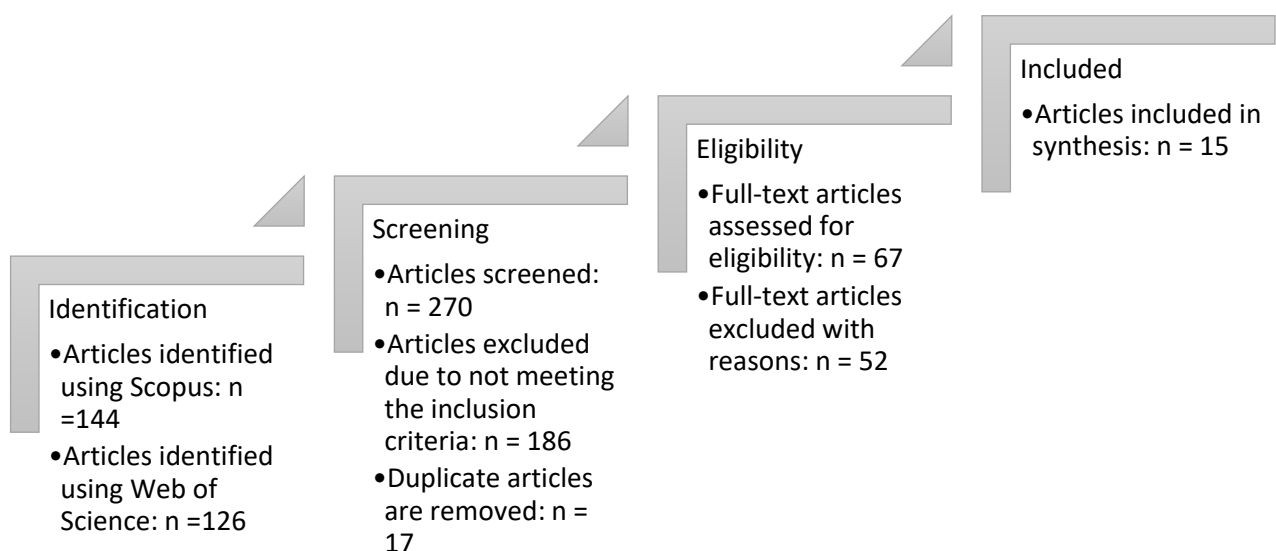


Figure 1. The primary systematic search steps (Adapted from Shaffril et al., 2019).

This study started with the identification process, which involved a literature search using specific keywords. This process was conducted in September 2022 and involved seeking synonyms for the main keywords for the study, namely "professional accountant" and "money laundering". The keywords were developed based on the research question as suggested by (Xiao and Watson, 2019). The process of identifying suitable keywords relied on an online thesaurus and keywords employed in previous studies. Table 1 provides details of the search string across both databases. By using these search strings, the study obtained a total of 270 potentially relevant studies (144 from Scopus and 126 from Web of Science).

Table 1

Search String used for Literature Search

Database	Search string
Scopus	TITLE-ABS-KEY (“money-laundering*” OR “money-launderer*” OR “proceeds of crim*” OR “predicate offenc*” OR “illicit fund*” OR “dirty money”) AND (“accounting professional” OR “accountant*” OR “audit*” OR “CPA” OR “Certified Public Accountant”)
Web of Science	(“money-laundering*” OR “money-launderer*” OR “proceeds of crim*” OR “predicate offenc*” OR “illicit fund*” OR “dirty money”) AND (“accounting professional” OR “accountant*” OR “audit*” OR “CPA” OR “Certified Public Accountant”)

In the screening process, the study utilised inclusion and exclusion criteria to select appropriate articles for incorporation in the systematic review procedure. The sorting function of the databases helps automate the screening process. Table 2 outlines the inclusion and exclusion criteria that were used in this study. Okoli (2015) suggested that the researchers should choose a manageable time period for their review. Therefore, articles published between 2017 and 2022 were selected for this study. This study builds its review on the most current literature, considering a span of six years that is pertinent and relevant to the present context. From both databases, only article journals were included to ensure the quality of the review, while all non-English documents were excluded. This process retrieved a total of 84 articles, of which 186 were excluded for not meeting the inclusion criteria. At this stage, 17 duplicate documents were omitted, leaving the remaining 67 articles for the eligibility process.

Table 2

Inclusion and Exclusion Criteria

Criteria	Inclusion	Exclusion
Year of articles	2017-2022	<2017
Document type	Article journal	Article review, book chapter, book series, book, conference paper, article in press
Language	English	Non-English

After the screening process, the authors proceeded with the eligibility assessment by manually evaluating the titles and abstracts of the 67 articles. This step was important to ensure that all selected articles aligned with the predetermined criteria and minimised the limitations caused by the database (Shaffril et al., 2021). Consequently, 52 articles were excluded due to the unavailability of full-text documents, a focus on fraud and corruption rather than money laundering, an emphasis on the audit committee instead of the auditor, a focus on article reviews rather than empirical data, and a focus on the roles of other professionals or AML regulations rather than the roles of professional accountants. After this comprehensive review, a total of 15 articles remained eligible for the systematic literature review, highlighting the roles and ethical dilemmas of professional accountants in the context of money laundering.

The remaining 15 articles were subsequently assessed to determine whether they were able to address the research objective. Initially, all researchers performed a comprehensive reading of the full article texts. Then, researchers extracted relevant data from the articles in accordance with the research question. They had identified relevant themes by performing a thematic analysis, as thematic analysis was deemed the most suitable for synthesising mixed research designs (Shaffril et al., 2021).

Results

The review obtained a total of 15 articles from a range of countries, namely Iraq, Malaysia, Italy, Jordan, the United Kingdom, Indonesia, Iran, the United States of America and Brazil. Two studies have been conducted across 11 countries and 116 countries, respectively. Within the spectrum of the selected articles, the study obtained five articles published in 2018, along with one published in 2019. The remaining articles were published in 2020, 2021, and 2022, with a total of four, three, and two studies, respectively. Interestingly, no article has been obtained for the year 2017. Furthermore, the composition of the studies shows that eleven studies adopted a quantitative approach, while another three studies used a qualitative approach. Only one study focuses on a mixed-method approach, integrating both qualitative and quantitative methods. By using a thematic analysis, four main themes were identified under the roles of professional accountants: enhancing knowledge and skills, offering expert opinion, detecting and investigating money laundering cases, and reporting suspected cases. Regarding ethical dilemmas, this study found some professional accountants face challenges that lead them to either facilitate the crime or resign from their positions. The results derived from the thematic analysis of the roles and responsibilities of professional accountants, together with their ethical dilemmas, are detailed in Table 3.

Table 3

Themes from the SLR Study

No	Author	Country	Type of Study	Roles of Professional Accountants				Ethical Dilemmas
				Enhancing Knowledge & Skills	Offering Expert Opinion	Detecting & Investigating Cases	Reporting Suspected Cases	
1	Al-Husseini, 2018	Iraq	MM	√		√		
2	Ismail, et al., 2018	Malaysia	QN				√	
3	Ravenda et al., 2018	Italy	QN			√		√
4	Alawaqleh et al., 2018	Jordan	QN	√		√		
5	Norton, 2018	United Kingdom	QL				√	
6	Dobrowolski & Sułkowski, 2019	11 countries	QL	√				
7	Sukardi, 2020	Indonesia	QL		√	√		
8	Salehi et al., 2020	Iran	QN	√		√	√	√
9	Amara et al., 2020	116 countries	QN			√	√	
10	Mohammadi et al., 2020	Iran	QN		√		√	√

No	Author	Country	Type of Study	Roles of Professional Accountants				Ethical Dilemmas
				Enhancing Knowledge & Skills	Offering Expert Opinion	Detecting & Investigating Cases	Reporting Suspected Cases	
11	Molla Imeny et al., 2021a	Iran	QN			√	√	√
12	Molla Imeny et al., 2021b	Iran	QN		√			
13	Al-Hadi et al., 2021	U.S.	QN	√	√			
14	Tarmizi et al., 2022	Malaysia	QN	√		√	√	
15	Sousa Lima et al., 2022	Brazil	QN			√		
Total Articles Focused on Theme				6 out of 15	4 out of 15	9 out of 15	7 out of 15	
Type of study								
QL= qualitative study								
QN= quantitative study								
MM = mixed-method study								

Enhancing Knowledge and Skills

One crucial role of professional accountants in the fight against money laundering is to enhance their knowledge and skills. Al-Husseini (2018) highlighted that external auditors' lack of knowledge regarding their responsibilities in detecting money-laundering operations, as well as their understanding of audit objectives and areas, results in a lack of detection of such operations. Likewise, Dobrowolski and Sułkowski (2019) found that auditors from supreme audit institutions' (SAIs) recognized the importance of Anti-Money Laundering (AML) evaluation. However, they mostly admitted their lack of knowledge and experience in effectively performing audits for entities engaged in the development and operation of AML systems. A study conducted in Iraq by Salehi et al (2020) found that most of the respondents, who are partners of auditing firms, actively participate in AML training courses annually. While this involvement results in the majority of them having good and average knowledge of Iranian AML rules and regulations and the recommendations outlined by the Financial Action Task Force (FATF), the same group exhibits weakness and an average level of familiarity with Wolfsberg Group standards, Basel standards, and other AML directives and best practices. Hence, comprehensive and relevant training and competence play an important role in the execution of an AML program (Tarmizi et al., 2022). Therefore, it is essential for the central bank, professional accounting bodies, and Big 4 audit firms to provide more comprehensive and in-depth awareness programs for professional accountants. In the absence of adequate knowledge and training, all programs relating to AML become unattainable. Furthermore, professional accountants should attend such training annually to ensure they are updated with the changes in legal acts related to AML. The implementation of Continuous Professional Education hours could make such training compulsory.

Professional accountants can benefit in several ways from enhancing their knowledge. As part of their roles, professional accountants are required to have a robust understanding of internal and external audits, along with a comprehension of the nature of the client's business and industry. This competency empowered them to identify any suspicious transactions and activities (Alawaqleh et al., 2018; Tarmizi et al., 2022). Furthermore, the importance of

external auditors's familiarity with the audit process has gained significance in addressing the issue of money laundering (Al-Husseini, 2018). The audit process can play a significant role in assisting businesses to meet legal obligations for compliance audits while also identifying both vulnerabilities and strengths within AML programs (Al-Husseini, 2018; Al-Hadi et al., 2021). These requisite skills in assessing the adequacy of a company's AML programs and customer due diligence policies assist professional accountants in being better able to perform appropriate transaction testing, particularly focusing on high-risk capital flows (Al-Hadi et al., 2021). They are also able to evaluate the sufficiency of training as well as the accuracy and comprehensiveness of information systems used for money laundering compliance. These specialist auditors can also leverage their knowledge in related areas, such as tax avoidance, for the purpose of enhancing their AML risk assessments (Al-Hadi et al., 2021).

Offering Expert Opinions

Professional accountants engaged in combating money laundering are anticipated to offer expert opinions to the company. According to Sukardi (2020), forensic accountants, in their capacity as professional accountants, are responsible for providing legal opinions and information to substantiate cases of corruption, money laundering, and other illegal activities. Furthermore, the presence of a robust money laundering control system (MLCS), coupled with the specialized role of auditors in identifying weaknesses and offering guidance on compliance and financial reporting obligations, results in a decrease in the use of tax havens by multinational financial corporations, thereby reducing instances of money laundering (Al-Hadi et al., 2021). The auditor is also responsible for reviewing the actions of entities to obtain reasonable assurance of observing the money laundering laws, assessing their effectiveness, and obtaining management approval regarding observing the laundering regulations during the financial statements audit (Mohammadi et al., 2020). Additionally, auditors are expected to provide an independent appraisal of the effectiveness of AML systems in Iranian banks, offering their opinions on whether the entities have AML policies, practices, and procedures in place (Imeny et al., 2021b). The assessment confirmed that internal risk management systems in Iranian banks align satisfactorily with international AML expectations as outlined by the Wolfsberg criteria.

Detecting and Investigating Money Laundering Cases

Professional accountants play significant roles in detecting and investigating money laundering within a company, even though they perceive money laundering detection as a challenging task Salehi et al (2020) in order to achieve the company's economic goals and protect the country's economy from potential risks (Alawaqleh et al., 2018). However, there is also evidence that some professional accountants do not perceive money laundering detection to be among their roles and responsibilities (Imeny et al., 2021a). This finding aligns with a study by Al-Husseini (2018), which identified auditors' lack of knowledge regarding their roles in detecting suspicious transactions and their understanding of audit objectives and areas as contributing factors to the insufficient detection of money laundering in Iraq. Moreover, factors contributing to the lack of money laundering detections also include the influence of professional standards and legal provisions in determining the roles of the auditor and the nature of the required tests to be performed by the auditor. Other than that, the effectiveness of the internal control system for AML, the presence of a compliance unit, legal requirements, management's cooperation with the auditor in evaluating AML programs, the contribution of the audit committees in assessing the internal control system for AML, and

support for both internal and external audit functions collectively present challenges in fighting money laundering schemes.

To address the challenges of detecting and investigating money laundering, professional accountants must acquire competency, specific skills, and techniques in a supportive environment (Tarmizi et al., 2022). Sukardi (2020) highlighted the significant role of professional accountants who possess the skill and technique to combine forensic accounting with investigative methods to identify fraudulent activities and prove the existence of criminal offenses. Additionally, forensic accountants play a significant role in calculating the assets confiscated resulting from a criminal offense, with the aim of returning these assets to the state treasury or the victims. Ravenda et al (2018) highlighted the importance of accrual models in identifying fraudulent manipulations related to money laundering, emphasizing the significance of discretionary accrual values as red flags that can complement other risk indicators in specific socio-economic and political contexts. Sousa Lima et al (2022) found social network analysis (SNA) as a powerful tool for forensic accountants to quickly identify key actors in financial networks and trace the flow of money (Sukardi, 2020). The study by Amara et al (2020) highlighted the significance of the strength of auditing and reporting standards (SARS) in reducing money laundering. Under strong auditing and reporting standards, auditors are more likely to assess the risks related to suspicious transactions and false reporting, as well as increase their level of skepticism when conducting their audit. This suggests that good reporting and auditing infrastructure may create a conducive environment for auditors to actively combat money laundering by detecting and revealing financial crimes to authorities. Additionally, Sukardi (2020) emphasizes the importance of strengthening the investigative audit process and forensic accounting in tracing assets during financial investigations related to money laundering.

Reporting suspected money laundering cases

Professional accountants have a role in reporting money laundering transactions and are expected to act as whistleblowers to report any corporate wrongdoing (Ismail, et al., 2018), as recommended by Financial Action Task Force (FATF) Recommendations 22 and 23 (Imeny et al., 2021a). However, according to Salehi et al (2020), 30 percent of respondents, consisting of partners of auditing firms, were unaware of their duties and responsibilities to report suspicious transactions to authorities, despite nearly 70 percent of respondents being aware of their obligations. Furthermore, it is also proven that the auditors in the United Kingdom exhibit limited engagement with the Suspicious Activity Reports (SARs) reporting system called ELMER (Norton, 2018). The auditor faces challenges in reporting suspicious activities since the activities may arise from a series of transactions rather than individual events.

In the process of reporting financial crime, professional accountants are expected to provide specific evidence of money laundering before filing a suspicious activity report (Imeny et al., 2021a). However, the study discovered there is a significant expectation gap between auditors and judges. Auditors believe that the reporting should only occur when the evidence is convincing, whereas judges argue that a transaction should be reported as suspicious even with less persuasive or less overwhelming evidence. The judges required the auditor to report suspicion when something "did not feel right" rather than waiting for more convincing evidence, especially when dealing with sophisticated money launderers. On the other hand, Mohammadi et al (2020) suggested that when the auditor has doubts about potential money

laundering issues, they should adjust or condition the audit report based on the significance of the matter.

There are several factors that motivate professional accountants to report any suspicious transactions related to money laundering schemes. According to Ismail et al. (2018), individuals with high moral reasoning are motivated to report the crime due to professional ethics, a sense of morality, and a sense of responsibility to the public. Additionally, the organizational structure of audit firms, consisting of their formal structure, whistleblowing policies and procedures, and legal protection for whistleblowers, also contributes to the motivation of professional accountants to make a report. Auditors are assured of legal protection with strong auditing and reporting standards when reporting these confidential affairs to authorities, as predicted by the standards (Amara et al., 2020). Furthermore, professional accountants are also motivated to comply with reporting responsibilities due to the perceived risk of non-compliance, as noted by (Tarmizi et al., 2022). Any non-compliance with money laundering regulations can damage the reputation of a professional accountant, and any reporting failure will result in penalties for reporting institutions.

Ethical Dilemmas Faced by Professional accountants

Despite their pivotal role in combating money laundering schemes, professional accountants may also encounter various ethical dilemmas in pursuing their roles. One of the most profound ethical dilemmas faced by professional accountants is the temptation to facilitate the entity with money laundering activities. A study conducted by Ravenda et al (2018) in Italy highlighted how the accounting process can be misused to conceal and carry out money laundering activities within specific socio-economic and political settings. The finding reveals that legally registered Mafia firms (LMFs) manipulate both aggregate revenues and expense accruals to a greater extent than lawful firms (LWFs) do to smooth profits and disguise or carry out money laundering schemes. Despite the obligations imposed on the profession, their share of reports filed with the investigation unit each year is still a very small fraction.

Another ethical issue arises from the superficial compliance of professional accountants, particularly in the Iranian context. Salehi et al (2020) highlighted that most of the Iranian auditors in money laundering cases merely complete the checklist of Anti-Money Laundering Implementing Regulations for Business and Non-Business Companies 2012. While this checklist may provide the appearance of compliance, it is often superficial and not preventive for money laundering. Additionally, another ethical dilemma emerges from the lack of awareness among professional accountants regarding their responsibilities to detect money laundering activities (Imeny et al., 2021a) and to report suspicious transactions to authorities (Salehi et al., 2020). In situations where professional accountants suspect that the entity or client is committing such a crime, they face a profound ethical dilemma. According to Mohammadi et al (2020), auditors may choose to resign when they believe that continuing work with an entity could lead to complicity in illegal activities. This difficult decision is guided by ethical and moral principles, which prioritize integrity over financial gain.

Discussion

The thematic analysis indicates that professional accountants are expected to fulfill four key roles in addressing money laundering activities: enhancing knowledge and skills, offering expert opinions, detecting and investigating money laundering cases, and reporting suspected cases. It is noteworthy that among the reviewed articles, none comprehensively

covered all four roles. Only two articles highlighted three of these roles, focusing on enhancing knowledge and skills, detecting and investigating money laundering cases, and reporting suspected cases. On the other hand, seven articles concentrate on just two roles, while six articles focus solely on one role. Among the fifteen articles, the most extensively discussed role was detecting and investigating money laundering cases, covered in nine articles, followed by reporting roles, enhancing knowledge roles, and finally offering expert opinions.

In the context of dealing with money laundering issues, professional accountants are required to possess specific knowledge and skills. They should be well-informed about their responsibilities in detecting money-laundering operations (Al-Husseini, 2018), understanding the importance of AML evaluation (Dobrowolski & Sułkowski, 2019), AML rules and regulations, and the recommendations outlined by the FATF (Salehi et al., 2020). Professional accountants are also expected to have the relevant skills, including auditing skills, investigative abilities, investigative intuition, critical and strategic thinking, and the ability to synthesize results from investigative analysis, as mentioned by Prabowo (2016). Moreover, Sallaberry et al (2023) highlighted that professional accountants with a higher level of personal responsibility tend to possess greater knowledge, particularly in identifying suspicious transactions. This enhanced knowledge contributes to greater sustainability and security for the organization and its employees. Awareness of AML regulations and the importance of ethical behavior among professional accountants can contribute to promoting sustainable corporate governance (Jong, 2023). It is very essential to understand the AML regime, as it helps reduce the vulnerability of professional accountants to money laundering risks (Newbury, 2017). The exemption from AML regulations and noncompliance with preventive measures, especially those described under FATF Recommendations 12, 16, 17, 24, and 25, would create a weak link in the system, making it susceptible to exploitation by money launderers (Newbury, 2017; Omar et al., 2016). This could have brought undesired outcomes in terms of regulatory image, where criminals and organized crime groups take advantage of regulatory differences to facilitate their money laundering activities (Omar et al., 2016).

Professional accountants play an important role in combating money laundering schemes by providing expert opinions to organizations. With the increasing prevalence of money laundering, there is a growing demand for accounting and auditing experts capable of gathering appropriate and sufficient evidence (Shbeilat & Alqatamin, 2022) to support legal opinion before the courts (Ahmed & Ahmed, 2021). The auditing industry also contributes to AML efforts by assisting law enforcement in investigating complex cases and educating clients on what money laundering is and how to safeguard themselves from inadvertently accepting illicit proceeds (Standing & Van Vuuren, 2003). Additionally, Sukardi (2020) discussed that forensic accountants can provide legal opinions and evidence to prove financial crime allegations.

While there is evidence that some professional accountants do not perceive money laundering detection as part of their responsibilities (Al-Husseini, 2018; Imeny et al., 2021a), and many auditors are unclear about the measures in place to combat money laundering (Standing & Van Vuuren, 2003), it is crucial to emphasize the importance of ongoing professional training of professional accountants in these areas. This training is essential to

minimize the risk of failure to detect suspicious transactions (Cindori & Petrović, 2018; Standing & Van Vuuren, 2003). To address the challenges associated with detecting and investigating money laundering, professional accountants must acquire competence, specific skills, and techniques in a supportive learning environment (Tarmizi et al., 2022). It is important to keep professional accountants updated with the latest detection-based countermeasures, which are currently the primary approach to prevention (Akartuna et al., 2022). However, the effectiveness of these countermeasures may vary due to unique circumstances and constraints specific to different stakeholders. Therefore, adopting a 'one-size-fits-all' approach to prevention is not recommended. Furthermore, Lokanan (2023) highlighted the significance of network and graph analytics in identifying criminal relationships within money laundering transactions. This analysis helps identify networks and visualize the flow of money involving individuals and entities operating across different jurisdictions. However, it is worth noting that the challenge in network and graph analysis is the adaptability of money launderers, as they continually devise new methods to evade detection, rendering transaction monitoring less effective when relying solely on historical data.

Professional accountants have a critical role in reporting any suspicious transactions that indicate possible laundering, as mandated by the AML Act, to assist in identifying the proceeds of crime (Gikonyo, 2018). Beside their requisite sufficient training and competence, professional accountants must act independently and responsibly when reporting suspicious activities observed within business entities (Cindori & Petrović, 2018). Hence, to report the suspected cases independently, an effective reward program that includes whistleblower protection and immunity is important, shielding professional accountants from reprisals and threats (Sallaberry et al., 2023; Nyrreröd et al., 2022). Additionally, this reward program should consider leniency for money launderers, excluding those convicted of a criminal offense associated with the predicate crime. The rewards should be mandatory and commensurate with the amount of seized or confiscated funds. Furthermore, professional accountants tend to increase their reporting efforts with supervisors' inspections (Gara et al., 2019). This positive effect mainly stems from actual intervention by the authorities following the supervisor's inspection, which often involves warning letters or stronger sanctions. The benefits of investing resources in establishing the Suspicious Transactions Reports (STR), as highlighted by Chan et al (2020), include the discovery and exposure of suspicious transactions, assisting in curbing criminal activities, and enhancing the entity's reputation. This study discovers that professional accountants in four previous studies confront ethical dilemmas, confronted with choices that push them either to facilitate illegal activities or resign from their professional positions. These ethical challenges highlight the complexity of their roles in combating money laundering cases and emphasize the need for clear ethical guidelines and adequate professional training to assist professional accountants with the tools to solve such dilemmas effectively.

Conclusion

The main purpose of this study is to systematically review the roles and ethical dilemmas of professional accountants in the context of money laundering based on high-impact journals retrieved from SCOPUS and WOS's databases. It is anticipated that the content of this study will help in supplementing the existing literature and afterward offer significant contributions towards practical purposes, especially for accountants, auditors, policymakers, researchers,

and other interested stakeholders. Specifically, the findings of this study provide a gateway to better understanding the roles played by professional accountants towards the current requirements, policies, and procedures of AML. This study also emphasizes strategic plans designed to collectively curb money laundering schemes in the future. The review concludes with four key roles that accounting professionals are expected to exhibit in relation to money laundering. First, enhance their knowledge and skills by providing them with an effective training program. Second, providing legal advice against money laundering as well as ensuring compliance with AML regulations to avoid facing serious offenses. Third, professional accountants should be given more opportunities to detect and investigate money laundering activity by utilizing various techniques and technologies in line with the advancement of knowledge and the density of legal requirements. Fourth, in countering this crime, professional accountants must act as insiders or whistleblowers to report money laundering violations. Given the fact that whistleblowing may adversely impact their future careers, it is strongly suggested that the regulators provide a better mechanism to guarantee the safety and protection of the respective whistleblowers against retaliation for reporting money laundering. This study also reveals the presence of ethical dilemmas among professional accountants in fulfilling their roles. Some professional accountants have a lack of awareness of their roles in combating money laundering and even merely go through fulfilling regulatory checklists without a genuine understanding of the evolving AML system and landscape. If an allegation of money laundering by their client was intense, following the high risk, some professionals may decide to resign rather than report the crime. Even worse, the evidence depicts the involvement of professional accountants in facilitating and allowing criminals to successfully practice money laundering activities. This study proposed two recommendations for future research. First, while reviewing past literature, it becomes evident that the topic of professional accountants' compliance in maintaining and documenting any suspicious transactions has received limited attention. Future scholars could delve into this role more comprehensively. Second, the role of providing expert opinions, although essential, has not been extensively highlighted in prior research. Subsequent studies could explore this role in greater depth, focusing on the nature of the opinions to be provided and their potential benefits.

Acknowledgement

The authors wish to acknowledge Universiti Teknologi MARA (UiTM) and Money Laundering Research Group that have helped in conducting this study.

Corresponding Author

Siti Hawa Shuid

Faculty of Accountancy, Universiti Teknologi MARA Cawangan Negeri Sembilan, Kampus Seremban, Persiaran Seremban 3/1, Seremban 3, 70300 Seremban, Negeri Sembilan, Malaysia

Email: hawashuid@uitm.edu.my

References

- Ahmed, N. R., & Ahmed, H. R. (2021). The role of the judicial accountant in curbing the money laundering process (Applied research in Rafidain Bank). *Indian Journal of Economics and Business*, 20(4).
- Akartuna, E. A., Johnson, S. D., & Thornton, A. (2022). Preventing the money laundering and terrorist financing risks of emerging technologies: An international policy Delphi study. *Technological Forecasting and Social Change*, 179, 121632. <https://doi.org/10.1016/j.techfore.2022.121632>
- Al-Hadi, A., Taylor, G., Richardson, G., & Eulaiwi, B. (2021). Money laundering control systems, external auditor specialization and tax haven use: An empirical analysis of US multinational financial corporations. *International Journal of Auditing*, 25(2), 582-601. <https://doi.org/10.1111/ijau.12233>
- Al-Husseini, E. (2018). Analysis of affecting factors in detection the external auditor for money laundering. *Opción, Año 34*, (16), 1305-1344.
- Alawaqleh, A., Airout, R., & Aleqab, M. M. (2018). Internal and external audit and the banks' commitment to detect and combating of money laundering in Jordan. *Academy of Accounting and Financial Studies Journal*, 22(5), 1-17.
- Amara, I., Khelif, H., & El Ammari, A. (2020). Strength of auditing and reporting standards, corruption and money laundering: A cross-country investigation. *Managerial Auditing Journal*, 35(9), 1243-1259. <https://doi.org/10.1108/MAJ-10-2018-2026>
- Chan, T. E., Chan, Y. H., & Lin, S. P. (2020). A causal model of the declaration intention of banks for suspected money-laundering transactions based on organizational commitment perspective. *Journal of Money Laundering Control*, 23(2), 403-425. <https://doi.org/10.1108/JMLC-12-2019-0098>
- Cindori, S., & Petrović, T. (2018). The significance of assessing money laundering risk as a part of auditing operations. *Athens Journal of Business & Economics*, 4(1), 79-92.
- Committee of Experts on the Evaluation of Anti-money Laundering Measures and the Financing of Terrorism (MONEYVAL). (2022). Annual Report for 2021. Retrieved from <https://rm.coe.int/moneyval-annual-report-2021/1680aad1fc>
- Dobrowolski, Z., & Sulkowski, L. (2019). Implementing a sustainable model for anti-money laundering in the United Nations development goals. *Sustainability*, 12(1), 244. <https://doi.org/10.3390/su12010244>
- Gara, M., Manaresi, F., Marchetti, D. J., & Marinucci, M. (2019). The impact of anti-money laundering oversight on banks' suspicious transaction reporting: Evidence from Italy. *Bank of Italy Occasional Paper*, 491.
- Gikonyo, C. (2018). Detection mechanisms under Kenya's anti-money laundering regime: Omissions and loopholes. *Journal of Money Laundering Control*, 21(1), 59-70. <https://doi.org/10.1108/JMLC-06-2017-0023>
- Gusenbauer, M., & Haddaway, N. R. (2020). Which academic search systems are suitable for systematic reviews or meta-analyses? Evaluating retrieval qualities of Google Scholar, PubMed, and 26 other resources. *Research Synthesis Methods*, 11(2), 181-217. <https://doi.org/10.1002/jrsm.1378>
- Ismail, A. M., Mamat, R. M. S., & Hassan, R. (2018). The influence of individual and organizational factor on external auditor whistleblowing practice in government-linked companies (GLC'S). *Asia-Pacific Management Accounting Journal (APMAJ)*, 13(1), 231-266.

- Jong, P. Y. (2023). *Ethical behaviour towards sustainable corporate governance in anti-money laundering and counter financing: Awareness, knowledge, and intentions among DNFBPs in Malaysia* [Doctoral dissertation, Universiti Tunku Abdul Rahman]. http://eprints.utar.edu.my/5680/1/Jong_Pei_Yii.pdf
- Lokanan, M. E. (2023). Financial fraud detection: The use of visualization techniques in credit card fraud and money laundering domains. *Journal of Money Laundering Control*, 26(3), 436-444. <https://doi.org/10.1108/JMLC-04-2022-0058>
- Mohammadi, S., Naghshbandi, N., & Moridahmadibezdi, Z. (2020). Investigating the impact of audit features on money laundering: Evidence from Iranian stock exchange companies. *Journal of Money Laundering Control*, 23(4), 913-930. <https://doi.org/10.1108/JMLC-09-2019-0072>
- Imeny, M. V., Norton, S. D., Moradi, M., & Salehi, M. (2021a). The anti-money laundering expectations gap in Iran: Auditor and judiciary perspectives. *Journal of Money Laundering Control*, 24(4), 681-692. <https://doi.org/10.1108/JMLC-09-2020-0105>
- Imeny, M. V., Norton, S. D., Salehi, M., & Moradi, M. (2021b). Perception versus reality: Iranian banks and international anti-money laundering expectations. *Journal of Money Laundering Control*, 24(1), 63-76. <https://doi.org/10.1108/JMLC-06-2020-0064>
- Murray, K. (2018). The cost of not wanting to know—the professions, money laundering and organised crime. *Journal of Financial Crime*, 25(1), 218-229. <https://doi.org/10.1108/JFC-11-2016-0071>
- Newbury, M. (2017). Designated non-financial businesses and professions: The weak link in Australia's AML/CTF regime. *Journal of Money Laundering Control*, 20(3), 247-261. <https://doi.org/10.1108/JMLC-08-2016-0038>
- Nyreröd, T., Andreadakis, S., & Spagnolo, G. (2022). Money laundering and sanctions enforcement: Large rewards, leniency and witness protection for whistleblowers. *Journal of Money Laundering Control*. <https://doi.org/10.1108/JMLC-05-2022-0068>
- Norton, S. D. (2018). Suspicion of money laundering reporting obligations: Auditor compliance, or sceptical failure to engage? *Critical Perspectives on Accounting*, 50, 56–66. <https://doi.org/10.1016/j.cpa.2017.09.003>
- Okoli, C. (2015). A guide to conducting a standalone systematic literature review. *Communications of the Association for Information Systems*, 37(43), 879-910.
- Omar, N., Johari, Z. A., & Mohamed, I. S. (2016). A review on the role of designated non-financial business and professions (DNFBPs) as preventive measures in mitigating money laundering. *International Scientific Researches Journal*, 72(7), 93-105. <https://doi.org/10.21506/j.ponte.2016.7.6>
- Page, M. J., McKenzie, J. E., Bossuyt, P. M., Boutron, I., Hoffmann, T. C., Mulrow, C. D., ... & Moher, D. (2021). The PRISMA 2020 statement: An updated guideline for reporting systematic reviews. *International Journal of Surgery*, 88, 105906. <https://doi.org/10.1016/j.ijssu.2021.105906>
- Prabowo, A. (2016). Money laundering and forensic accounting in Indonesia: Postgraduate perspective. *International Business Management*, 10(23), 5633-5642.
- Ravenda, D., Valencia-Silva, M. M., Argiles-Bosch, J. M., & Garcia-Blandon, J. (2018). Accrual management as an indication of money laundering through legally registered Mafia firms in Italy. *Accounting, Auditing & Accountability Journal*, 31(1), 286-317. <https://doi.org/10.1108/AAAJ-12-2015-2329>

- Repousis, S., Lois, P., & Veli, V. (2019). An investigation of the fraud risk and fraud scheme methods in Greek commercial banks. *Journal of Money Laundering Control*, 22(1), 53-61. <https://doi.org/10.1108/JMLC-11-2017-0065>
- Salehi, M., Imeny, M. V., & Baygi, K. A. (2020). The necessity of anti-money laundering standards for Iranian auditors. *Journal of Money Laundering Control*, 23(1), 187-207. <https://doi.org/10.1108/JMLC-05-2019-0034>
- Sallaberry, J. D., Venturini, L. D. B., Martínez-Conesa, I., & Flach, L. (2023). Personal responsibility and knowledge about money laundering: A study with Brazilian accountants. *Journal of Financial Crime*. <https://doi.org/10.1108/JFC-03-2023-0068>
- Shaffril, H. A. M., Abu Samah, A., Samsuddin, S. F., Ali, Z. (2019). Mirror-mirror on the wall, what climate change adaptation strategies are practiced by the Asian's fishermen of all? *Journal of Cleaner Production*, 232, 104–117. <https://doi.org/10.1016/j.jclepro.2019.05.262>
- Shaffril, H. A. M., Samsuddin, S. F., & Abu Samah, A. (2021). The ABC of systematic literature review: The basic methodological guidance for beginners. *Quality & Quantity*, 55(4), 1319-1346.
- Shbeilat, M. K., & Alqatamin, R. M. (2022). Challenges and forward-looking roles of forensic accounting in combating money laundering: Evidence from the developing market. *Journal of Governance and Regulation*, 11(3), 103-120. <https://doi.org/10.22495/jgrv11i3art10>
- Sittlington, S., & Harvey, J. (2018). Prevention of money laundering and the role of asset recovery. *Crime, Law and Social Change*, 70, 421-441. <https://doi.org/10.1007/s10611-018-9773-z>
- Standing, A., & Van Vuuren, H. (2003). The role of auditors: Research into organised crime and money laundering. *Institute for Security Studies Papers*, 2003(73), 16.
- Sukardi. (2020). Financial crime on investigation in Industrial Revolution 4.0 ERA. *International Journal of Criminology and Sociology*, 9, 695–708.
- Tarmizi, M. A., Zolkafil, S., Omar, N., Hasnan, S., & Nazri, S. M. S. N. F. (2022). Compliance determinants of anti-money laundering regime among professional accountants in Malaysia. *Journal of Money Laundering Control*, 26(2), 361-387. <https://doi.org/10.1108/JMLC-01-2022-0003>
- The Association of International Accountants. (2023). Professional money launderers and how they impact the accountancy sector. Retrieved from <https://www.aiaworldwide.com/insights/articles/professional-money-launderers-and-how-they-impact-the-accountancy-sector/>
- Tuch, A. F. (2016). The limits of gatekeeper liability. *Washington and Lee Law Review Online*, 73(2), 619-640.
- Xiao, Y., & Watson, M. (2019). Guidance on conducting a systematic literature review. *Journal of Planning Education and Research*, 39(1), 93-112. <https://doi.org/10.1177/0739456X17723971>