WHAT A START TO AN ERA.
AND IT'S ALL THANKS TO YOU,
OUR CUSTOMERS, PARTNERS
AND EMPLOYEES.
Who we are, what we do

Data, Analytics and Workflow

- Equipping customers with the data, insights, technologies, and expertise to succeed
- The rise of smarter humans with smarter machines

Driving Performance

- News content workflow and analytics
- Indices and benchmarks
- Trading infrastructure and services
- Hosted transaction processing
- Pricing reference and entity data
- Execution management systems

Venues and Transactions

- Leading insight and services for our industry’s most demanding business processes
- Connecting the global ecosystem to drive performance and innovation
- Supporting the industry to be more agile in trading and investing

Enabling Community and Connectivity

- Anti-financial crime data and Enhanced Due Diligence solutions
- KYC/AML managed services and Utilities
- Legal Entity Identifiers
- Enterprise Risk Management Technology

Risk

- Anticipate, proactively manage, and inform on risk and compliance
- Supporting global and expanding businesses manage risk across different geographies
9:10-10:10 Session 1 - Podsumowanie wdrożenia w Polsce ustawy o przeciwdziałaniu praniu pieniędzy oraz finansowaniu teroryzmu. (sesja w języku polskim)
Speaker: Joanna Grynfelder, Compliance Manager Poland, CMC markets

10:10-11:00 Session 2 - The Coalition to Fight Financial Crime
Speaker: Christopher Stringham Risk Solution Consultant Refinitiv

Coffee Break

11:20-11:40 Session 3 - The Power of World Check. How to manage non-compliance risk while reducing operational costs?
Speaker: Christopher Stringham Risk Solution Consultant Refinitiv
Session 4 - Investing on Innovation/Road-map  
*Speaker: Christopher Stringham  Risk Solution Consultant Refinitiv*

Coffee Break

Session 5 - Sankcje - (sesja w języku polskim)  
*Speaker Marcin Lukowski - EMEA Compliance Officer, JLL*

Session 6 - High Risk Customers and Third Parties: Who are they and how you can partner with Refinitiv to know about them.  
*Speaker: Radosław Biniarz, EDD Case Manager Refinitiv*

Networking Lunch
Joanna Grynfelder
Compliance Manager, CMC Markets UK SA Oddział w Polsce
Podsumowanie wdrożenia w Polsce ustawy o przeciwdziałaniu praniu pieniędzy oraz finansowaniu terroryzmu

Joanna Grynfelder, Compliance Manager
CMC Markets UK SA Oddział w Polsce
www.forumcompliance.com
Ustawa o przeciwdziałaniu praniu pieniędzy oraz finansowaniu terroryzmu

Ustawa z dnia 1 marca 2018 r. o przeciwdziałaniu praniu pieniędzy oraz finansowaniu terroryzmu:

• 13 lipca 2018
• 13 października 2019; rozdz. 6, art. 194 i art. 195
Ustawa o przeciwdziałaniu praniu pieniędzy oraz finansowaniu terroryzmu

Ustawa z dnia 1 marca 2018 r. o przeciwdziałaniu praniu pieniędzy oraz finansowaniu terroryzmu:

• 13 lipca 2018
PEP

- nieprecyzyjna definicja PEP, szersza niż w IV Dyrektywie AML
- brak publicznych baz danych zawierających wymagane informacje
- konieczność zweryfikowania posiadanych informacji o klientach
- PEP również dla beneficjentów rzeczywistych

- przyjmowanie oświadczeń
- weryfikacja istniejących baz danych
- poleganie na bazach danych zewnętrznych dostawców
ustalenie beneficjentów rzeczywistych

- uzupełnienie i aktualizacja posiadanych informacji o klientach
- wypowiadanie umów rachunków
- komunikacja do klientów
Stosowanie środków bezpieczeństwa finansowego

- zmiana procedur wewnętrznych instytucji obowiązanej
- zmiana w systemach monitorowania transakcji (bieżące monitorowanie i aktualizowanie)
- przeprowadzenie oceny ryzyka opartej na nowych zasadach
- pozyskanie dodatkowych danych o klientach (państwo urodzenia)
- aktualizacja baz danych klientów
Archiwizacja

- dostosowanie procesów archiwizacji do przechowywania dokumentacji dotyczących transakcji nawet przez okres 10 lat
Dane osobowe

• umożliwienie sporządzania kopii dokumentów tożsamości na potrzeby procesu AML
• kontrowersyjne stanowisko UODO dotyczące kopiowania dokumentów
Przekazywanie do GIIF informacji o transakcjach i transferach

- nowe zasady raportowania
- brak rozporządzenia
Ustawa z dnia 1 marca 2018 r. o przeciwdziałaniu praniu pieniędzy oraz finansowaniu terroryzmu:

- 13 października 2019; rozdz. 6 (Centralny Rejestr Beneficjentów rzeczywistych), art. 194 i art. 195

Art. 194. Tworzy się Centralny Rejestr Beneficjentów Rzeczywistych.

Art. 195. Spółki, o których mowa w art. 58, wpisane do Krajowego Rejestru Sądowego przed dniem wejścia w życie rozdziału 6 zgłaszają do Centralnego Rejestru Beneficjentów Rzeczywistych informacje o beneficjentach rzeczywistych w terminie 6 miesięcy od dnia wejścia w życie tego rozdziału.
Centralny Rejestr Beneficjentów Rzeczywistych

- dane nie będą weryfikowane
- podmioty nie wiedzą, kto jest beneficjentem rzeczywistym
- brak połączenia z bazą KRS
Zwiększenie odpowiedzialności osoby realizującej program AML

- nowelizacja ustawy – projekt z 13 sierpnia 2019
- możliwość nałożenia kary administracyjnej na przedstawicieli kadry kierowniczej wyznaczonych na podstawie art. 6 oraz art. 8 ustawy
- wymóg niekaralności beneficjentów rzeczywistych, wspólników akcjonariuszy i zajmujących stanowiska kierownicze w podmiotach wskazanych w art. 2 ust. 1 pkt 16 lub 18 Ustawy o pp poft
- wymóg szkoleń i doświadczenia
Dziękuję

j.grynfelder@forumcompliance.com
www.forumcompliance.com
Christopher Stringham
Risk Solution Consultant, Refinitiv
The Coalition to Fighting Financial Crime

Christopher Stringham
26 September 2019
Who we are and what we do
A primer on Refinitiv
Our DNA – as the world’s first Fintech with over a 150 year history

**1850**  
PIGEON  
Paul Julius Reuter used carrier pigeons and the new Calais-Dover cable to transmit stock market quotations

**1858**  
CABLE  
Cable from GB to US laid, enabling Reuters to expand its expertise in global currency exchange

**1865**  
TELEGRAPH  
Reuters first to report President Lincoln assassination by telegraphing news to London

**1868**  
STOCKMASTER  
Market prices carried from New York to London for delivery around Europe on Stockmaster machines

**1873**  
MONITOR  
Monitor Money Rates Service launches, creating the first electronic marketplace for FX

**1881**  
DEALING  
Reuters Monitor Monitoring Service launches enabling FX trades via video. Quite literally the first Social Network

**1889**  
DEALING 2000  
Reuters launches Dealing 2000 enabling automated communication between traders and their back office

**1999**  
REUTERS 3000XTRA  
Private network links to Reuters gives live prices from global stock, commodity, futures, derivative and bond markets as well as FX price makers.

**2001**  
RMDS  
Reuters Market Data System launched to help clients integrate and distribute third-party data

**2006**  
TREP  
Thomson Reuters Enterprise Platform launches, delivering a massive decrease in latency in the movement of complex financial content between counterparties

**2010**  
EIKON  
Thomson Reuters launches next generation desktop Eikon, providing access to trusted news, data & analytics for the financial community

**2013**  
ELEKTRON  
Enabling firms to function and run their operations by delivering powerful content and technology solutions

**2016**  
EIKON APP STUDIO  
Open platform approach taken to a new level with Eikon App Studio and Thomson Reuters Professional Developer Community (TRPDC)

**2017**  
ELEKTRON DATA PLATFORM  
An open platform that supports an ecosystem where content, analytics and proprietary, customer and 3rd party technology come together to reveal hidden opportunities, potential risks and new pathways to profits

**2018**  
REFINITIV FORMATION
Who we are, what we do

Data, Analytics and Workflow

- Equipping customers with the data, insights, technologies, and expertise to succeed
- The rise of smarter humans with smarter machines

Driving Performance

- News content workflow and analytics
- Indices and benchmarks
- Trading infrastructure and services
- Hosted transaction processing
- Pricing reference and entity data
- Execution management systems

Venues and Transactions

- Leading insight and services for our industry’s most demanding business processes
- Connecting the global ecosystem to drive performance and innovation
- Supporting the industry to be more agile in trading and investing

Enabling Community and Connectivity

- Elemental source of mission critical data into our customer’s core workflow

- FX venues – Dealing, Matching, FXall
- Fixed income venues – D2D and D2C
- Messaging and chat
- Eikon Auctions and FI call outs

Risk

- Anticipate, proactively manage, and inform on risk and compliance
- Supporting global and expanding businesses manage risk across different geographies

Managing Risk & Regulation

- Anti-financial crime data and Enhanced Due Diligence solutions
- KYC/AML managed services and Utilities
- Legal Entity Identifiers
- Enterprise Risk Management Technology
About World-Check

World-Check® is our risk intelligence database

It provides organizations with structured data from reliable and reputable public domain sources to help them fulfill their due diligence obligations and identify potential financial and related crime, as well as politically exposed persons (PEPs).

Meeting global legislation:
- Anti-Money Laundering Legislation
- Foreign Corrupt Practices Act
- UK Bribery Act
- OECD Anti-Bribery Act
- Countering the Financing of Terrorism Legislation CFT/CTF
- UK Modern Slavery Act
- Conflict Minerals Legislation
- Dodd-Frank Act
- California Transparency in Supply Chains Act
- EU Timber Regulation (EUTR)-FLEGT
- Australian Illegal Logging Prohibition Act
- Environmental Legislation
- PEP Screening – National/Global
- Sanctions Compliance

What is included in the data?

- Sanctions
- PEPs & RCAs
- Law Enforcement
- Regulatory Enforcement
- Negative media
Current state of affairs
Money laundering continues to dominate the headlines…

‘EU drafts new money laundering laws following bank scandals’

A crackdown on financial crime means global banks are derisking

Charities and poor migrants are among the hardest hit

‘Criminals hide ‘billions’ in crypto-cash’

Share

CFA Institute Contributor

Identity thieves are getting more sophisticated

‘Danske Bank implicated in $234 billion money laundering scandal’

Share

Punjab National Bank hit by $1.8bn in fraudulent transactions

‘Cyber attacks are more sophisticated than ever’ interview with Seth Berman

Malta and Cyprus face growing pressure over money-laundering

Trouble for the European Union’s two smallest economies
Collectively, we’re 1% from total failure…there’s a crisis of confidence

Money laundering is truly a global phenomenon

Proceeds from criminal activity in some regions appear to be increasing exponentially

‘Technical’ compliance, rather than effectiveness, is at the center of the current AML system

Data protection rules will impede information sharing between the public and the private sector

Correspondent banks are terminating relationships with regional institutions (e.g. ‘de-risking’), creating barriers to entry and financial inclusion
The value of money laundered each year is greater than most countries’ GDPs

- **Refinitiv’s ‘True cost of financial crime’ report**
  - $1.5 trillion in lost turnover
  - $1.3 trillion spent on combatting financial crime (3.1% of annual turnover)
  - 47% of firms have been a victim of financial crime
  - 40 million are victims of modern slavery ($150 billion)

- **UN report**
  - 5% of global GDP in illicit proceeds from *organised crime* alone
  - Less than 1% of proceeds are seized or frozen by law enforcement

- **Global Financial Integrity & IMF**
  - Organised crime worth $1.6T – $2.2T globally
  - IMF study corruption would deliver an additional US$1 trillion in tax revenues annually
Common challenges to perform due diligence and monitoring

**SUBSTANTIAL COMPLIANCE COST**
- Compliance costs for banks and other players are significant and growing
- But, the cost of not complying is even higher

**FINANCIAL EXCLUSION**
- Despite proven demand for FS, the market has not yet met those demands
- Global regulators recognize and seek to curb financial exclusion

**RAPIDLY EVOLVING TECHNOLOGY**
- Technology advances increase the capabilities of bad actors
- Lack of regulatory standards on new technology limits ability to counter financial crime

**COMPLEX REGULATORY ENVIRONMENT**
- Regulatory approaches differ significantly between jurisdictions
- Sometimes there are opposing requirements
The need for a collective response
Together with WEF & Europol, we formed the Global Coalition to Fight Financial Crime

Global scope

to raise awareness and create a global standard of cooperation to replace regional safeguards

Representing different parts of the anti-financial crime ecosystem, the Coalition has the expertise to advocate for more effective allocation of resources by promoting best-in-class approaches to:

• Financial crime management
• Risk intelligence
• Law enforcement capabilities
• Public-private information sharing
• Thought leadership
Mitigate financial crime by:

1. **Enhance the effectiveness of the global AML regime**
2. **Identify key weaknesses in the current system**
3. **Advocate tangible reforms at political and policy levels**

Five key objectives identified:

1. To **raise global awareness** of financial crime as a critical challenge with grave financial and human consequences.
2. To **promote more effective information sharing** between public and private entities on a coordinated, global level.
3. Propose mechanisms to identify emerging threats & **best practice approaches to** develop more robust money laundering systems and controls.
4. To **identify pain points** in the current AML regime and propose solutions for addressing these.
5. To **support initiatives** to assist governments and law enforcement to more effectively identify and seize the assets of criminals.
Substantial work linked to the Coalition’s objectives

1. Raise global awareness of financial crime as a critical challenge with grave financial and human consequence
   - WEF Davos Event 2019
   - Coalition Launch
   - Data analytics project: Human Trafficking
   - Social media campaign reached 64 countries, 15 million

2. Promote more effective information sharing between public and private entities
   - Promote the Future of Financial Intelligence Sharing project
   - Discussions with Policy bodies
   - Proposed SA event with FFIS

3. Propose mechanisms to identify emerging threats & best practice approaches to more robust ML controls
   - Regional WEF Events – Digital Tools in the Fight Against Financial Crime
   - Nov. 21, 2018 Crypto Event
   - RUSI Financial Crime 2.0 Project

4. Identify pain points in the current AML/CTF regime and proposing solutions for addressing these
   - G7 Engagement
   - Engagement with global policy makers on AML/GDPR rules
   - True Cost of Financial Crime report

Generate political will to tackle financial crime
Ongoing engagement with G7
We need to promote public-private partnerships and the use of technology

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Model</th>
<th>Led by</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada – Project PROTECT</td>
<td>Typology co-development</td>
<td>Private sector</td>
</tr>
<tr>
<td>Netherlands – Terrorist Financing Taskforce</td>
<td>Analysts co-location &amp; typology development</td>
<td>Prosecutor-led together with police</td>
</tr>
<tr>
<td>Hong Kong Fraud and Money Laundering Intelligence Taskforce</td>
<td>Tactical info sharing linked to typologies</td>
<td>Law enforcement</td>
</tr>
<tr>
<td>UK Joint Money Laundering Intelligence Taskforce</td>
<td>Tactical info sharing linked to typologies</td>
<td>Law enforcement</td>
</tr>
<tr>
<td>Australian Fintel Alliance</td>
<td>Secondment based &amp; analyst co-location</td>
<td>FIU</td>
</tr>
<tr>
<td>US Financial Crimes Enforcement Network</td>
<td>Case briefing for tactical info sharing</td>
<td>FinCEN</td>
</tr>
<tr>
<td>Singapore AML/CFT Partnership</td>
<td>Typology co-development only</td>
<td>Supervisor</td>
</tr>
<tr>
<td>Europol Financial Intelligence PPP</td>
<td>Transnational typology development</td>
<td>Europol-led</td>
</tr>
</tbody>
</table>
Future of Financial Intelligence Sharing (FFIS) research programme

Understanding the role of public-private financial information-sharing partnerships to detect, prevent and disrupt crime.

www.future-fis.com
A new perspective on the financial crime challenge – a case study in banking instability

ABLV - one the largest banks in Latvia

Country profile: €8.1 billion in foreign deposits, controlled by 26,000 shell companies
- Banking system represent 40% of Latvia’s GDP!

- 12 February: FinCEN accused ABLV of ‘institutional money laundering’
  - Lost access to the USD funding market
  - Within days there was a €600 million run-on-the-bank

- 19 February: ECB suspended all payments
However, that’s just the beginning… where did the illicit proceeds go?

- **Primary deposit flow and ‘flight-to-safety’**
  - Germany
  - Switzerland
  - Russia

- **Secondary deposit flow destination**
  - UK
  - Ukraine
  - Czech Republic
  - Estonia
  - Cyprus
Coffee Break
No Giveaways Here
The Freedom Fund is a leader in the global movement to end modern slavery.

„We identify and invest in the most effective frontline efforts to eradicate modern slavery in the countries and sectors where it is most prevalent. Partnering with visionary investors, governments, anti-slavery organizations and those at risk of exploitation, we tackle the systems that allow slavery to persist and thrive. Working together, we protect vulnerable populations, liberate and reintegrate those enslaved and prosecute those responsible.

Committed to achieving the greatest impact, the Freedom Fund draws on the investment heritage of our founders, investing in new initiatives and replicating and scaling-up proven programs globally.“

https://freedomfund.org/
How to manage non-compliance risk while reducing operational costs? World-Check
Aggregates and provides clients with access to:

- Heightened risk individuals and entities
- From public domain data (open source) data which is:
  - Global
  - Aggregated
  - Deduplicated
  - Structured
  - Consolidated
  - Intelligence
  - Associated
  - Enhanced
  - Narrative

GLOBAL

World-Check records individuals in every habited location on earth – **245 countries and dependent territories** – ISO 3166-1
World-Check data

Key features and benefits

- World-Check is a global standard, trusted by 16,000+ customers in 180+ countries
- World-Check is designed and structured to minimise operational cost and lower Total Cost of Ownership
- World-Check is constantly updated with 50K+ new profiles and 80K+ records reviewed each month
- World-Check is used by 300+ government and intelligence agencies worldwide
- World-Check’s sanctions content is updated 24/7/365 and is ISAE 3000 certified on an annual basis
- World-Check has strict quality-controlled inclusion criteria to ensure accuracy and relevance
World-Check data
Key features and benefits (cont.)

World-Check inclusion criteria and content is aligned to legislation and regularly updated.

World-Check has a global operational footprint, with 400+ highly trained research analysts who speak 65+ languages.

World-Check establishes connections between records, allowing clients to uncover hidden risks.

World-Check is highly structured with 30+ fields, allowing flexible and highly targeted screening.

World-Check is globally comprehensive, with 4+ million records.

World-Check has won numerous awards, including from Interpol.
The World-Check content is driven by and **aligned to legislation and regulation**; it is a tool designed to help clients to comply with regulatory obligations, such as:

**Sanctions**
- OFAC, CAATSA, UN, UKHMT, CANS, MINEFI, DFAT, and hundreds more

**Anti-Money Laundering**
- FATF & Wolfsberg guidance, BSA, PATRIOT Act, 4MLD & 5MLD, etc.

**Anti-bribery & Corruption**
- FCPA, UKBA, OECD Anti-Bribery Convention, UN Convention Against Corruption, etc.

**Countering the Financing of Terrorism**
- UN Convention for the Suppression of the Financing of Terrorism, FATF, PATRIOT Act, etc.

**Anti-organized crime**
- Palermo Convention, POCA, RICO, etc.

**Human rights & supply chains**
- UK Modern Slavery Act, Dodd Frank Act, California Transparency in Supply Chains Act, etc.

**Environmental legislation**
- EU Timber Regulation, US Lacey Act, etc.
World-Check contains data about…

- Countries & regions
- Individuals
- Companies & Banks
- State Owned Entities
- Criminal & terrorist groups
- Ports & airports
- Aircraft
- Vessels
- International organizations
- Other entities
## What is included in the data?

### Type of offenses

<table>
<thead>
<tr>
<th>Abuse of Office</th>
<th>Cease and Desist Order</th>
<th>Deported or Exiled</th>
<th>Financial Services Warning</th>
<th>Illegal Gambling</th>
<th>Land Right Violation</th>
<th>Regulatory Enforcement</th>
<th>Theft and Embezzlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrative Misconduct</td>
<td>Civil Penalty</td>
<td>Disciplinary Action</td>
<td>Forced and Slave Labour</td>
<td>Illegal Immigration</td>
<td>Law Enforcement</td>
<td>Sanctions</td>
<td>Trafficking in Stolen Goods</td>
</tr>
<tr>
<td>Aircraft Hijacking and Aviation Crimes</td>
<td>Consumer Protection Violation</td>
<td>Disqualifications</td>
<td>Forgery and Uttering</td>
<td>Illegal Possession and Sale</td>
<td>Licence Revocation</td>
<td>Securities Violation</td>
<td>Travel or Visa Restriction</td>
</tr>
<tr>
<td>Antitrust Violation</td>
<td>Control or Regulation Violation</td>
<td>Energy Crime</td>
<td>Fraud</td>
<td>Illegal Restraint and Kidnapping</td>
<td>Money Laundering</td>
<td>Sexual Exploitation</td>
<td>Unlawful Competition</td>
</tr>
<tr>
<td>Arms and Ammunition Trafficking</td>
<td>Counterfeiting</td>
<td>Environmental Crime</td>
<td>Frozen and Seized Assets</td>
<td>Insider Trading</td>
<td>Narcotics Trafficking</td>
<td>Smuggling</td>
<td>Unlawful Money Lending</td>
</tr>
<tr>
<td>Arson and Destruction of Property</td>
<td>Cybercrime</td>
<td>Exploitation of Children</td>
<td>Healthcare Fraud</td>
<td>Criminal Insolvency, Liquidation and Bankruptcy</td>
<td>Obstruction of Justice</td>
<td>Tax and Customs Violation</td>
<td>Violent Crime</td>
</tr>
<tr>
<td>Breach of Fiduciary Duty</td>
<td>Crimes Against the State</td>
<td>Extortion</td>
<td>Human Rights Violation</td>
<td>IP Rights Infringement</td>
<td>Organized Crime</td>
<td>Tender Violation and Restrictions</td>
<td>War Crime</td>
</tr>
</tbody>
</table>

**SENsitivITy: ConfIDENTIAL | Refinitiv World-Check Risk Intelligence Data**
Why is World-Check data used?

**Required for:**

- New Client screening at on boarding at account opening
- Retrospective and ongoing screening for existing clients
- High risk payment screening especially cross border payments
- End client validation
- Correspondent banking relationships
- Transaction monitoring look-backs
- Supplier, partner, agent and employee initial and ongoing screening
- Periodic or once-off due diligence, e.g. pre-IPO or acquisition
World-Check data
Aggregated and deduplicated

- Each record within World-Check represents only a single individual or legal entity
- For example, Hassan Abdullah Hersi Al-Turki is listed on 49 different government lists, but is only listed in World-Check as a single record with 20+ news articles
- Deduplication is a critical competitive advantage as it greatly decreases remediation efforts and simplifies match validation
World-Check data
Aggregated and deduplicated

- Deduplication significantly reduces the number of records that need to be screened
- For Sanctions compliance, this can reduce workloads by well over 50%

SanctionSets contain only the data provided by the sanction body in World-Check format with World-Check UIDs – transactional screening
Sanctions Update
Sanctions Coverage

Sanctions are protective restrictive measures, such as an asset freeze or block, investment or travel ban, financial sanctions, arms and trade embargoes, etc.

World-Check covers:

- 280+ known sanctions lists
- 100% coverage – external assurance with ISAE 3000 audit of major sanctions lists on an annual basis
- Major sanctions list monitored and covered on a 24/7/365 basis
- Special team dedicated to covering all sanctions lists as well as dedicated Quality Control
- Records are “keyworded” allowing flexible screening
Implicit or narrative sanctions coverage

Narrative sanctions apply when a national or international sanctions listing states that:
• Export or Trade Embargoes,
• Financial restrictions or Economic sanctions,
• Asset freezes, or
• Investment bans…

also apply to an entity not sanctioned by name but covered by a narrative statement extending sanctions to such non-listed entity. This requires significant further qualitative research to uncover.

World-Check covers implicit sanctions extensively.

Significant research work to cover OFAC, UN, EU, UKHMT and Russian narrative sanctions (Narrative Sanctions Research Unit).

Additional Resources

Expert Talk
A roadmap to the US OFAC sectoral sanctions and the 50% ownership rule

Expert Talk
Navigating economic and trade sanctions

OFAC 50% rule
• Any entity owned (50% or more) by a listed person
• Owned in the aggregate, directly and indirectly
Keywords explained
Helping filter results to ensure better quality matching

– Approximately 25% of World-Check reports contain one or more keywords; this means that 75% of World-Check reports contain information gained only through World-Check research.

– Keywords are divided into four types shown below with examples:

<table>
<thead>
<tr>
<th>SANCTIONS</th>
<th>REGULATORY ENFORCEMENT</th>
<th>LAW ENFORCEMENT</th>
<th>OTHER BODIES</th>
</tr>
</thead>
</table>

- New keyword type: SANCTIONS RELATED

Russian Sectoral Sanctions [RSSRE-WC] OFAC CBW Directive [USCBW-WC]
Narrative Sanctions
World-Check keyword solutions

RSSRE-WC → RSSRE-50-WC → RSSRE-DIR1-WC
RSSRE-WC → EUFSR-RUS-50-WC → RSSRE-DIR2-WC

INSAE-WC → INSAE-50-WC

DATA'S JUST THE BEGINNING
PEP Expiration
The problem of overscreening

Overscreening occurs when you screen more than what is required by regulation ("compliance view") or what is required to manage AML, CFT or sanctions risks ("risk view"). This is a major contributor to operational cost.

Examples include:

- Screening against sanctions from **geographically distant** or **irrelevant** sanctions bodies

- Screening all PEPs and not developing **an institutional PEP definition** informed by applicable regulatory requirements and risks

- Screening all **adverse media** or all **watchlist lists**, regardless of relevance or risk
**Problem Statement:** For how long after leaving office is a PEP a PEP?

Different countries have varying standards, e.g. Germany = 1 year, Brazil = 5 years, etc…

**Solution:** The biography section of the PEP record is restructured in a new multi-value field to clearly indicate the details of each PEP role. This allows a client to define PEP expiration that is shorter than the World-Check default expiration and therefore exclude that record from re-screening.

### Existing PEP Sub-category field

#### Existing PEP Position field

---

**PEP Status = Active | Inactive | Unknown**

Calculated value based on the aggregate Role statuses of each PEP AND the status of any connected Primary PEPs

---

<table>
<thead>
<tr>
<th>PEP ROLE</th>
<th>PEP ROLE LEVEL</th>
<th>PEP POSITION</th>
<th>PEP BIOGRAPHY</th>
<th>PEP ROLE STATUS</th>
<th>TERM START DATE</th>
<th>TERM END DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>State presidential Candidate</td>
<td>PEP N</td>
<td>Candidate</td>
<td>Democratic Party candidate for US President in 2016 general election</td>
<td>Current</td>
<td>Jul 2009</td>
<td></td>
</tr>
<tr>
<td>Secretary of State</td>
<td>PEP N</td>
<td>Secretary of State</td>
<td>US Secretary of State</td>
<td>Current</td>
<td>Jan 2009</td>
<td></td>
</tr>
<tr>
<td>Senior Official – SOE</td>
<td>PEP N</td>
<td>Senior Official – SOE</td>
<td>Member of the Board of Directors for The Broadcasting Board of Governors</td>
<td>Former</td>
<td>2009</td>
<td>2013</td>
</tr>
<tr>
<td>Federal Senator</td>
<td>PEP N</td>
<td>Member of Legislature</td>
<td>Federal senator for the State of New York</td>
<td>Former</td>
<td>Unknown</td>
<td>Unknown</td>
</tr>
</tbody>
</table>
PEP Expiration in action

The PEP status value in the biography is clearly defined in this multi-layered structure:

- Role
- Role Level
- Position
- Current, Former or Unknown
- Term start and finish date
- PEP role bio

New C6 Update Classification

The same information, displayed differently with clearly defined separators, in the Data-File download.

<table>
<thead>
<tr>
<th>PEP ROLES</th>
<th>PEP STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrator</td>
<td>PEP N</td>
</tr>
<tr>
<td>Chief of Protocol</td>
<td>PEP N</td>
</tr>
<tr>
<td>Consul</td>
<td>PEP N</td>
</tr>
<tr>
<td>Councillor</td>
<td>PEP N</td>
</tr>
<tr>
<td>Government Minister</td>
<td>PEP N</td>
</tr>
<tr>
<td>Honorary Consul</td>
<td>PEP N</td>
</tr>
<tr>
<td>Mayor</td>
<td>PEP N</td>
</tr>
<tr>
<td>Permanent Representative</td>
<td>PEP N</td>
</tr>
</tbody>
</table>
Politically Exposed Persons (PEPs)

New PEP Expiration field
Terrorism Category Update
There are 2 types of records under the World-Check **TERRORISM** categories:

1. Person or entity arrested or charged on suspicion of involvement in terrorism or terror related activities or convicted of terror related crime

2. Person or entity identified on a national or internationally recognized banning, warning, wanted list (e.g. OFAC, UN, INTERPOL, etc.) as connected to terrorism or individuals connected to such organizations.
Report categorization explained

The categorization of reports associated with the Financial Action Task Force (FATF) predicate crimes in pre-conviction and post-conviction stages.

– **Pre-conviction**
  Individuals who are investigated, accused, arrested, charged, questioned or detained remain categorized as either **INDIVIDUAL** or in the correct **non-crime category** (i.e., legal, religion, diplomat, etc.) until conviction

  New: **NONCONVICTION TERROR**

– **Post-conviction/pleading guilty categories**
  – CRIME – NARCOTICS
  – CRIME – ORGANIZED
  – CRIME – WAR
  – CRIME – FINANCIAL
  – **CRIME – TERROR** (new)
  – CRIME – OTHER
World-Check categories

Every World-Check report is classified in one or more of 20+ ways

<table>
<thead>
<tr>
<th>Bank</th>
<th>Crime-Other</th>
<th>Individual</th>
<th>Political Party</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corporate</td>
<td>Crime-Terror</td>
<td>Legal</td>
<td>Port</td>
</tr>
<tr>
<td>Country</td>
<td>Crime-War</td>
<td>Military</td>
<td>Religion</td>
</tr>
<tr>
<td>Crime-Financial</td>
<td>Diplomat</td>
<td>Nonconviction Terror</td>
<td>Trade Union</td>
</tr>
<tr>
<td>Crime-Narcotics</td>
<td>Embargo</td>
<td>Organization</td>
<td>Vessel</td>
</tr>
<tr>
<td>Crime-Organized</td>
<td>Embargo Vessel</td>
<td>Political Individual</td>
<td></td>
</tr>
</tbody>
</table>
Content Update Classification

Provides details on the type of update last made to each record, divided into five categories:

1. C1 – most critical updates
2. C2
3. C3
4. C4 – least critical updates
5. C5 – record reviewed with no update (non-client facing)
6. C6 – new data fields introduced (new)

Allows clients to determine which reports need to be rescreened, eliminating a significant amount of work.
Nearly 40% of World-Check reports are in the INDIVIDUAL category and meet the following criteria:

- **Facing charges, but not yet convicted**
  Person accused, investigated, arrested, charged, indicted, detained, questioned or on trial for World-Check related offenses

- **Politically exposed**
  Individual *appointed* to a PEP position (as opposed to elected), or they are an *immediate relative or close associate* of primary PEPs

- **They do not meet the criteria for a World-Check crime category**
  They are an individual appearing on a regulatory, law enforcement or global sanctions watch list, such as U.S. Office of Foreign Assets Control (OFAC), Disqualified Directors or Interpol

Record tagging will make it possible to easily determine what types of offences are associated with a non-conviction record.

Example tags: “Human Trafficking”, “Bribery and Corruption”, “Cybercrime” etc.
Further Updates

- Matching Engine Enhancement - algorithms enhanced in order to reduce number of false positives
- Marijuana related business content set
Investing in Innovation

World-Check One: Media, Vessel and Beneficiary Ownership screening
A unique media screening and processing feature powered by artificial intelligence (AI) that helps address the regulatory and reputational consequences of overlooking key data in the fight against financial crime.

An opt-in, integrated feature that delivers machine learning capability increasing efficiency by filtering unstructured content from over 16,000 global print and web sources, giving institutions more accurate and relevant data faster.
Structured vs. Unstructured Negative Media Content

- **Structured Negative Media Content**
  - PEPs, RCAs, SOEs and SIEs
  - Official Lists
  - Sanction, Watch, Regulatory and Law Enforcement Lists.

- **Unstructured**
  - Media Check
    - All negative media content including non-financial (reputational) risks
  - Content captured in World-Check data, reported in the reputable media as either being accused, questioned/investigated/arrested/charged/convicted of a predicate offense that World-Check monitors. World-Check has strict inclusion criteria which it adheres to.
  - Unstructured text-based content such as news content, provides coverage of all negative content including financial crime and reputational risks.

- **World-Check Structured Records**
  - Politically Exposed Persons, Relative or Close Associate, State Owned Entities and State Invested Enterprises.
In the digital age, vast volumes of information can overwhelm attempts to pinpoint what is relevant to financial crime and eliminate what is not.

Missing an important piece of media information about a specific individual or entity could have significant consequences, particularly from a regulatory compliance perspective – and it is therefore critical that clients find the clear signal in the noise.
Intelligent Tagging and Classification – Taming Unstructured Content

**Unstructured Content**

- Traditionally licensed content
- Traditionally licensed content
- Royalty based redistribution
- 13,000+ quality sources
- Newswires
- Global, national and regional newspapers
- Government
- Full-text search and archive
- Intelligent tagging
- 23 languages
- Continuously updated

**AI**

- KYC Taxonomy
- Name Extraction
- Document Topics
- Risk Detection

**Structure**

- Search and Retrieval
- Relationships

**Delivery**

- World-Check One
- Initial Screening
- On-going Screening

---

FirstRain

- 3000+ sources
- Online News
- Law enforcement
- Blogs
- Full text searching
- Intelligent tagging
- 13 languages
- Updated 4 times a day
Using Natural Language Processing (NLP) to Identify False Positive Risk Relationships

**Traditional aggregator/Web search engine approach**

Officer Jane Doe arrested the accused Joe Bloggs

In this example, both Jane Doe and Joe Bloggs would be marked as possible matches due to their name appearing near negative keywords. Any article referring to “Joseph Bloggs” would be missed.

**Our unique approach**

Officer Jane Doe arrested the accused Joe Bloggs

Joseph Bloggs
Joseph Peter Bloggs
Joe P. Bloggs

By using artificial intelligence, we can provide intelligent “name matching” and surface articles where an entity is more likely facing a risk. In this case, “Joe Bloggs” is the entity facing a risk.
Taxonomy – Categorizing Unstructured Content

Environmental risk

Financial crime

Financial risk/health

Intellectual property rights/brand infringements/anticompetitive behavior

Information security, IT governance, security breaches, cybercrime

Sanctions enforcement and restrictions

Social risk inc. employment practices, child exploitation, conflict minerals, forced and slave labor, human rights violations

Crime inc. conspiracy, collusion, cross-border, organized crime, trafficking, weapons, violence, war crimes

Terrorism related matters

Banking risk inc. clients, products, business practices

Theft, fraud, bribery, corruption, abuse of power, forgery and counterfeiting, tax evasion, embezzlement

Political exposure

Accusation

Charge

Conviction

Exoneration
Media Check in action

Once you have selected the Media-Check page you will be presented with a list of article headlines matching your screening criteria. On the left you will find the filter panel that allows you to further refine your search results and on the right a set of matching article headlines will be displayed. From here you can click each headline to view the full text or multi-select articles to attach to a case.

Results view
Switch between All Matched Articles and previously attached articles to see any media attached to the case.

Smart Filter toggle
The smart filter finds articles that include risk keywords impacting the screened entity and any name variations.

Matched entity filter
Use the entity filter to see the count of articles per matched entity and to filter articles.

Narrow results
Further filter results by using the Filters panel. Enter additional keywords or select from pre-defined regions/countries, article topics, and Publication type filters.

Case report exports
You can export articles attached to the case by selecting Export > Case Report and select Headline Only or Full text

Media resolution
You can select and attach up to 50 articles to each case including the Risk assessment level and any notes.

Duplicates filters
Near exact duplicate articles are automatically grouped together, click on “Similar articles” to expand the group.

Article topics
Easily identify the AML topics that each article references.
What is Vessel Check?

World-Check One Vessel Check is an opt-in, integrated feature that delivers a powerful combination of trusted and accurate data sets for comprehensive screening, all on a single platform.
A powerful combination

- Unrivalled breadth and depth of IHS Maritime data combined with World-Check trusted and accurate risk intelligence on the award winning World-Check One data screening platform.
- Request an EDD report directly off the World-Check One platform.
- This single platform approach means that all relevant information is available in one place and this aids over-stretched compliance teams, reducing the strain on resources and boosting efficiency.
The three step process at a glance

1. **IDENTITY, LOCATION & OWNERSHIP SCREENING**
   - Records screened & verified against IHS Maritime data
     - Includes all International Maritime Organization (IMO) numbers and characteristics like movement, port, operator etc.
     - Dynamically tracks ownership, management, name and flag changes of vessels
     - Information is updated hourly
     - Over 11 years of vessel data

2. **RISK SCREENING**
   - Records screened against World-Check for risk associated to KYC due diligence, and financial crime
     - Highlights all maritime vessels appearing on sanctions, watch and enforcement lists, including intelligence on vessels registered in, associated with or under the flag of, an embargoed country or entity
     - Contains non-embargoed vessels, which are directly associated with sanctioned countries, sanctioned entities and sanctioned individuals
     - Contains relevant sea ports in embargoed countries
     - Has close links to the databases of major government and trans-national maritime surveillance and tracking agencies
     - Highlights connections to financial crime. Where relevant, registered owners and beneficial owners, with detailed, separate records for each

3. **ENHANCED DUE DILIGENCE SCREENING**
   - Detailed enhanced due diligence background report for any entity or individual identified as requiring further scrutiny.
     - Enables a detailed background check in the form of an enhanced due diligence report should a person or entity be flagged during the screening process
     - Reports can be conducted on any person or entity no matter where they are located
     - Our Enhanced Due Diligence offers considerable expertise in foreign languages and locating hard to find information

* Optional add-on
World-Check One: UBO Check
Powered by Dun & Bradstreet

The power of establishing a risk based approach for UBO, from screening to enhanced due diligence checks designed to fit your specific needs
Beneficial ownership and the law

• Global anti-money laundering (AML) and financial crime laws require organizations to identify, validate and screen the UBOs, both direct and indirect, of an entity before establishing a business relationship (examples include: AMLD5, FATF recommendations, …)

• Potentially false customer declarations on ownership structures create AML risk, consequently independent verification of ownership structures are needed
Organizations struggle to verify ownership hierarchies

- Ownership information may be fragmented, stored in different locations, or difficult to find
- Legal entities that are established in high secrecy jurisdictions
- Different jurisdictions often have different methods of defining and recording ownership
- Documentation held in varying languages
- Financial criminals may deliberately create layers of opacity
Our solution: Market-leading data sets combined in one platform

Dun and Bradstreet UBO data has over 30,000 data sources in more than 215 countries to support UBO identification and validation.

And

Refinitiv’s market-leading World-Check Risk Intelligence data, with over 4 million structured records, including more than 700 sanctions, watch and enforcement lists to screen names against, to reveal possible regulatory or reputational risk.

Integrated in to our award winning World-Check One screening platform with time and cost saving workflow solution tools to help you make informed business decisions faster.
About Dun & Bradstreet data

- Nearly ninety percent of the Fortune 500, and companies of every size around the world, rely on Dun & Bradstreet data, insights and analytics
- Covers companies in over 215 countries
- 100 million connections and beneficial ownership calculations down to 0.01%
- A truly global view
- Information is kept up-to-date and relevant through automated data capture process
- More than a century of experience
About World-Check Risk Intelligence

- Over 400 highly trained researchers
- Expertise in more than 60 languages
- Over 4 million highly structured records
- Over 700 sanctions, regulatory and law enforcement lists

- Screen for PEP, watch list or sanctions exposure, as well as negative media
- Thousands of media sources, company information and regulatory filings
- Exclusive features to help you work more efficiently
Integrated workflow for verifying and screening beneficiary owners

- Combining world-leading data sources
- Integrated workflow enables greater efficiency in AML operations through seamlessly importing UBO data into the screening process
- Innovative visualisation capabilities help identify hidden relationships and potential risk

Advanced Case Manager functionality uses parent case logic that allows linked entities to be grouped to build a holistic view of ownership and potential risk
UBO Check in Action
UBO Check in Action
Find a company Search and screen

Screen for entering your search criteria note the fields with * are compulsory fields to activate your search.

The screenshots will be replaced from time to time.
UBO Check in Action

Results for UBO data/matches

The screenshots will be replaced from time to time.
UBO Check in Action
Visualization of relationship and ownership

The screenshots will be replaced from time to time.
UBO Check in Action
Screen against World-Check Risk Intelligence

The screenshots will be replaced from time to time.
UBO Check in Action
Taking it one step further with Enhanced Due Diligence (EDD) reports

Order EDD report

The screenshots will be replaced from time to time.
Sankcje międzynarodowe

dr Marcin Łukowski – EMEA Compliance Officer
1. Czym są sankcje?
2. Przenikanie się reżimów sankcyjnych
3. Zależności między sankcjami międzynarodowymi a procesem AML
4. Dobre praktyki
Czym są sankcje?
Kto nakłada sankcje?

- Rada Bezpieczeństwa
- Rada UE (po podjęciu decyzji politycznej przez Radę Europejską)
- Prezydent (Executive Orders)
- Kongres
- OFAC (Biuro ds. Kontroli Aktywów Zagranicznych)
Reżimy sankcyjne nakładają się na siebie

GLOBAL SANCTIONS REGIMES 2016

UNITED NATIONS

AL-QAEDA
CAR1
DRC3
GUINEA-BISSAU
IRAN
IRAQ
LEBANON
LIBYA
SOMALIA/ERITREA
SOUTH SUDAN
SUDAN
NORTH KOREA
TALIBAN
YEMEN

UNITED STATES

COUNTERNARCOTICS
CUBA
CYBER
MAGNITSKY (RUSSIA)
NON-PROLIFERATION
ROUGH DIAMOND TRADE
TRANSNATIONAL CRIMINAL ORGS
VENEZUELA

EUROPEAN UNION

BURMA (MYANMAR)
CHINA
EGYPT
HAITI
MOLDOVA
TUNISIA
UNITED STATES


Source: U.S. Treasury Department  Credits: Jonathan Masters, Julia Ro

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Terytorialność i eksterytorialność sankcji

Sankcje UE obowiązują:

a) na terytorium Unii;

b) na pokładach samolotów i statków podlegających jurysdykcji państw członkowskich;

c) każdą osobę będącą obywatelem państwa członkowskiego, przebywającej na terytorium Unii lub poza nim;

d) spółki zarejestrowane w UE

e) spółki prowadzące działalność na terenie UE

Sankcje USA wiążą:

a) obywateli i rezydentów USA (wszędzie)

a) Spółki zarejestrowane w USA i ich zagraniczne agencje i przedstawicielstwa (pod pewnymi warunkami nie dot. samodzielnych spółek zależnych –nie dot. np. Iranu, Kuby)

a) “Secondary sanctions” mogą być nałożone na spółki nieamerykańskie
Lamesa v. Cynergy (wrzesień 2019) – Wielka Brytania
• Zasada 50 %
Rodzaje sankcji

• Finansowe
• Handlowe
Na kogo można nałożyć sankcje?

- Państwa
- Grupy terrorystyczne
- Przedsiębiorstwa
- Osoby fizyczne
Co może być objęte sankcjami?

• Towary

• Usługi

• Usługi związane z towarami
Konsekwencje naruszenia sankcji

- Kary finansowe
- Odpowiedzialność karna (grzywna, więzienie)
- Wykluczenie z przetargów publicznych
- Naruszenie kontraktów z innymi klientami
- Szkody reputacyjne
- Utrata zaufania klientów
Spółka może naruszyć sankcje angażując się w transakcję z podmiotem objętym sankcjami zarówno bezpośrednio jak i **pośrednio**.

**Artykuł 2**

1. Zakazuje się sprzedaży, dostawy, przekazywania lub wywozu, bezpośrednio lub **pośrednio**, towarów i technologii podwójnego zastosowania — niezależnie od tego, czy te towary i technologia pochodzą z Unii — na rzecz jakiejkolwiek osoby fizycznej lub prawnej, podmiotu lub organu w Rosji lub do wykorzystania w Rosji, jeżeli te produkty są lub mogą być wykorzystane, w całości lub części, do użytku wojskowego lub dla wojskowego użytkownika końcowego. (rozp. dot. Rosji)

**Artykuł 14**

1. Zamraża się wszystkie fundusze i zasoby gospodarcze należące do osób fizycznych lub prawnych, podmiotów lub organów wymienionych w załączniku II i IIa, pozostające w ich posiadaniu, dyspozycji lub pod ich kontrolą.

2. Osobom fizycznym lub prawnym, podmiotom lub organom wymienionym w załącznikach II i IIa nie udostępnia się, bezpośrednio ani **pośrednio**, żadnych funduszy lub zasobów gospodarczych.

3. Zakazuje się świadomego i umyślnego udziału w działaniach, których celem lub skutkiem jest bezpośrednio lub **pośrednio** ominięcie środków, o których mowa w ust. 1 i 2. (rozp. dot. Syrii)
Due to US comprehensive sanctions, JLL cannot do any business in the following countries and territories:

• Iran
• Cuba
• Syria
• North Korea
• Crimea / Sevastopol

Spółka musi określić jakiego rodzaju ryzyko jest gotowa ponieść.

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• Iran
• Cuba
• Syria
• North Korea
• Crimea / Sevastopol
Proces AML a Sankcje

Przestrzeganie nałożonych sankcji:
• każda spółka, każda osoba fizyczna
• bez względu na profil działalności

Przestrzeganie wymogów AML
• instytucje obowiązane

Jak być pewnym, że klient nie jest na liście sankcji jeśli nie wiemy kto jest jego beneficialtem rzeczywistym?
1 Identyfikacja klienta
2 Profil działalności klienta
3 AML check
4 Sanctions check
5 Solvency Check
6 Conflict check
7 Opinia w mediach
8 Eskalacja
Pozostałe działania

- Wprowadziliśmy Globalną Politykę, która wyznacza minimalne standardy Compliance obowiązujące wszystkie biura

- Stosujemy Automatyczny Screening:
  - każde nazwisko i nazwa firmy wprowadzana do CRM jest automatycznie skanowana pod kątem sankcji i AML

- 2 modele:
  - AML/KYC check jest przeprowadzany przez dedykowany team
  - AML/KYC check jest przeprowadzany przez biznes
Wielowektorowe zaangażowanie pracowników w procesy Compliance

Assistants
- KYC Administrators, junior staff

Fee-Earners
- Job Directors, Brokers

Reviewers
- Local Leadership, Legal & Compliance
Świadomość pracowników

AML  GDPR
Co powinna zrobić każda spółka?

Poznaj swój produkt

Jeśli spółka produkuje towary

- klasyfikacja towaru wg kodu Nomenklatury Scalonej
- nadanie numeru zgodnego z rozp. 428/2009

Jeśli spółka świadczy usługi

- sprawdzenie czy usługa jest wymieniona w rozporządzeniu nakładającym sankcje.
- sprawdzenie czy usługa nie jest „pomocą techniczną”
Sanctions check **przed** nawiązaniem relacji biznesowej

**Faktura tylko po** przeprowadzeniu Compliance check

**Dowody potwierdzające** przeprowadzenie Compliance check
Na czym polega zadanie Compliance Officera?

Due diligence
Thank you

dr Marcin Łukowski
Radosław Biniarz

EDD Case Manager, Refinitiv
High Risk Customers and Third Parties

How to identify, manage and address your risks by partnering with Refinitiv

Radosław Biniarz, CAMS
Case Manager, Enhanced Due Diligence
September 2019
# Initial Risk Assessment

<table>
<thead>
<tr>
<th>Name</th>
<th>Company Name</th>
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<tbody>
<tr>
<td>John Smith</td>
<td>Abc Ltd.</td>
<td>Constance Daniels</td>
<td>A.J. Smith</td>
</tr>
<tr>
<td>Mary Jones</td>
<td>Radosław Biniarz</td>
<td>Johann Strauss</td>
<td>Samuel Beck</td>
</tr>
<tr>
<td>Sayaka Ito</td>
<td>EVO Incorporated</td>
<td>Joanna Wilson</td>
<td>Sergey Vladimirovich Lumin</td>
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<tr>
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<td>Company GmbH</td>
<td>KLM Inc.</td>
<td>Jan Nowak</td>
</tr>
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<td>FED Inc.</td>
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Initial Risk Assessment

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</table>

- Lack of Context
- Local language
- Not enough info
Enhanced Due Diligence (EDD) reports provide detailed background checks on individuals and entities as part of wider anticorruption, anti-money laundering, or other compliance programs.

Used to:

- Enable compliance with global regulatory statutes such as KYC, AML/ CFT legislation, anti-bribery legislation and any legal obligations associated with Politically Exposed Persons or PEPs. (European AML Framework, FCPA, UK Bribery Act, Modern Slavery Act, etc.)
- Protect against reputational damage

IT IS:
- One-off research exercise.
- Research is done by analysts in research centres.
- Data gathered legally and ethically in public domain.
- Pre-agreed number of subjects only.
- We classify risk.

IT IS NOT:
- No continuous screening.
- Not done by machines or Google Translate.
- No unethical activities or dubious sources.
- We do not extend research indefinitely.
- We do not advise on risk.
What do we do?

EDD research elements

- Registration Data
- UBO
- Comprehensive Media and Internet Searches
- Global Compliance Check
- Litigation, Bankruptcy, Regulatory, Law Enforcement
- Business Intelligence
EDD Research Elements

Media and Internet searches

- Research conducted by local language speakers.
- Sources include Internet search engines and international/local news aggregators.
- Company checks conducted on official names, former names, trade names, aliases, abbreviations.
- Individual checks conducted on multiple name combinations, translations and transliterations.

Adam Tomasz Skowronek
Adam T Skowronek
Adam Skowronek
Skowronek Adam
Adam Thomas Skowronek

Saddam Hussein / Hussain / Hoessein / Husayn (صدام حسين)
Saddam Hussein / Hussain/ Hoessein / Husayn Al Tikriti (صدام حسين التكريتي)
Saddam H Al Tikriti (صدام ح التكريتي)
Saddam Al Tikriti (صدام التكريتي)
Al Tikriti Saddam (التكريتي صدام)
El Tikriti / Tikriti / alTikriti/ eltikriti (التكريتي)
EDD Research Elements

Global Compliance Checks
- Compliance, regulatory, sanctions and political exposure → World-Check

Litigation, Bankruptcy, Regulatory and Law Enforcement checks
- Global country database containing 8000+ country specific databases
- Maintained, audited and expanded by dedicated Content and Knowledge Management teams
- Various methods of retrieval
  - Online sources (open / subscribed)
  - Aggregators
  - Offline sources (manual retrieval)
Ultimate Beneficial Ownership

Identifying the ultimate beneficial owner (UBO): The challenge of finding the needle in the haystack

Out of 237 countries, territories or jurisdictions where companies can be incorporated:

- **62%** have online corporate registries
- **79%** have corporate registries available online/in-person/via fax/post/via a lawyer
- **51%** provide director information and only **57%** disclose shareholders

- **Registry information often out of date or incomplete.** Ownership information can change overtime and registries often do not update in real time
- **UBO research, as done by Refinitiv EDD, spans across registration as well as all available public domain data. We investigate hard-stops through lateral searches in order to present a comprehensive picture.**
Business Intelligence

Survey through authoritative sources of a person or company’s background and reputation. It is conducted by our global network of carefully selected and verified subcontractors and managed by our in-house team of BI Managers. BI sources are selected for their authority and credibility, and their proximity to subjects.

• detailing political associations through relationship mapping
• detailing and contextualizing risk / corruption / social accountability / links to sanctioned entities etc.
• examining source of wealth, expansion of desktop for determining UBO

When BI brings most value

➢ Most developing / emerging / frontier markets (e.g. Myanmar/Burma)
➢ High risk environment
➢ Poorly developed civil sector; lack of independent institutions, public domain records, poor media coverage
➢ Rapidly developing economy and society with significant emerging “macro” social and political issues

Inquiries are conducted in full confidence and within ethical constraints, results are cross-checked with public domain findings at several steps during the report’s lifecycle.
What else can we do?

Customized approach

“Let us help you do what you do”:

• Working to Client’s templates (including supporting documents)
• Hybrid research methodology
• Client’s risk assessment
• Great track record against strict quality control

“Targeted EDD”:

• Beyond reputational overview
• Query-oriented research
• Insights into specific issues
• High-severity cases
• Extensive, high-value reports
Example of customization
High volume screening with risk assessment – reports seamlessly integrated into the workflow

- Registration Data
- UBO
- Comprehensive Media and Internet Searches
- Global Compliance Check
- Litigation, Bankruptcy, Regulatory, Law Enforcement
- Educational and Employment Verification
- Personal Reference Check
- Business Intelligence

UBO → GCC → Custom Media → Risk Assessment
Enhanced Due Diligence API

The EDD API allows our clients and third parties to directly connect with our EDD ordering portal, which enables users to order, check statuses and retrieve their reports.

Best in class security features:
- Data management centers and fully trained staff working on EDD workflow
- ISO27001 certified with regular code of conduct ethics and data security training
- Externally authenticated systems
- Reduced log-in burden, saving you time and simplifying user management

Best in class user experience:
- Integrated with existing applications, providing a simplified solution
- Filter information with the EDD platform
- Check reports status and retrieve up to date EDD reports
- Retrieve risk summary directly to your system

WORKFLOW OF EDD API

Client

EDD API
- Check System
- Create Case
- Search Case
- Amend Case
- Get Master
Key points of differentiation

**Unparalleled knowledge and experience**

We are the only provider with Knowledge Management, Audit and Content teams who identify the best sources in each location, enabling our researchers to spend less time searching and more time analysing. AI powered tools allow more precise and faster process.

Our staff are Counter Fraud Specialist and Certified Anti-Money Laundering Specialist.

**PWC ISAE 3000 Security certification**

We are the only EDD provider with ISAE 3000 certification. Our technology and process is of outmost security standards, certified by external auditor. Our secure online portal makes it easy to order, track and administer. API facility allows integration with 3PR management systems.

EDD data is hosted in ISO/IEC 2700127001 certified data centers in Singapore and London.

**Consistent quality and ethical practices**

We average 120+ reports per day globally, yet we have a proven track record of 99.7% quality success consistently. Year on year. No one else does.

Highest ethical standard of collecting human intelligence via the most comprehensive network of sources in the market provides access to original intelligence not available through the public domain, giving our clients a crucial competitive advantage.

A proven and trusted supplier to the corporate and financial industry

In corporate sector we work for:

- one of the top 5 automotive company with over $80 billion revenue
- four of top 10 technology companies by revenue
- third globally largest pharmaceutical company

+ Hundreds of clients across all sectors, including extractive, retail, energy, defence, aerospace, construction and education.
Thank you