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It's all about the Data

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Agenda



Trends in Sanctions



Improvements to our PEP & REP Data Offering

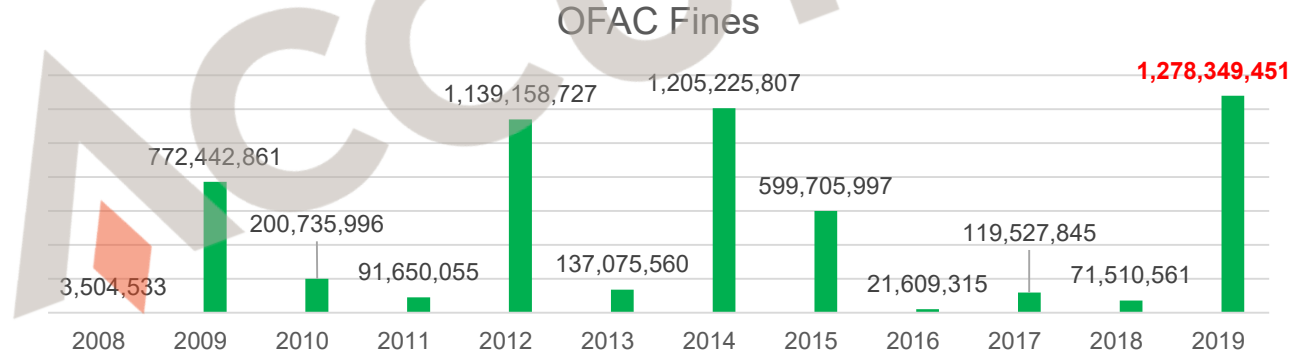


Focus on High Quality content delivery processes

ACCURITY

Sanctions Explained

- Economic sanctions are coercive foreign policy tools that work by disrupting otherwise profitable commerce between the governments imposing them and their targets.
- OFAC Sanctions went from a trend of comprehensive sanctions (e.g. CUBA, IRAN, NORTH KOREA) to targeted sanctions (e.g. Sectoral Sanctions, Targeted Sanctions)



Fishing vs Whaling

- Bush Jr. and Fishing – 2008, 104 enforcement actions totaling \$3.5 million USD in fines or \$33,697 average per year
- Obama and Whaling – 2009 to 2016, 164 enforcements and \$4.1 billion, average 20 enforcements at \$520 million per year, \$25 million per violation
- Trump – 2017 to 2019, 37 total enforcements, \$1.47 billion, 12 enforcements at \$489 million per year, \$39 million per violation

“During Trump’s presidency OFAC has pursued enforcement actions against foreign firms 43% of the time, roughly double the rate of the Obama Administration.”

Lesser known, diverging and complex sanctions programs taking the forefront

Different Approaches to Iran

United States

- Back and forth regarding Iran and JCPOA
- Limited exemptions
- Sanctions a/g all economic activity and secondary sanctions

European Union

- Targets specific Iranian firms
- Instrument for Supporting Trade Exchange (Instex)
- “Blocking Regulations” protect firms from extraterritorial application of sanctions

Targeted Sanctions a/g Venezuela

- Prohibits debt with a maturity of longer than 90 days and issued on behalf of the PdVSA
- Prohibits debt with a maturity of longer than 30 days and issued on behalf of any other part of the Venezuelan government
- Non-blocking of property and the Government of Venezuela not added to the SDN list

Identifying Red Flags early is a key mitigation factor



Vessel Name Changes

“SAM MA 2”- listed on the 2018 OFAC advisory changed its name to “MYONG SIN”, and re-listed on the 2019 advisory.



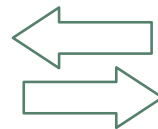
Proximity to high-risk and/or sanctioned ports

“ASIA HONOR” was not listed on the February 2018 advisory, even though it had visited the port of Najin, North Korea on June 23rd, 2017



Dual-use Goods

While complex, institutions should have measures in place, as part of their risk-based systems and controls that can assist in the identification and escalation (for further review) of dual-use goods in trade transactions



Ship-to-Ship Transfers or other AIS anomalies

OFAC provides a list of tankers capable of engaging in STS transfers of banned goods in their updated advisory

What does this mean for your program?

- 1 Requires a data provider that is responsive to these changes and provides insights related to the data
- 2 Requires granular datasets that easily differentiate entities
- 3 Seek out data providers who are performing research and identifying sanctioned parties who are not added to the SDN list

Capture the advantage of precise sanctions perspective



- Data delivers customized, agile access to comprehensive and current sanctions data to support the evolving requirements of your risk-based strategies.
- Mitigate the impact of global volatility and stay focused on business goals with streamlined, risk-based screening.
- We deliver authoritative, global financial crime compliance intelligence so businesses can synchronize screening, increase operational efficiencies and keep transaction workflows on track.

Politically & Reputationally
Exposed Persons and negative
news powered by
WorldCompliance™ data



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Count on the advantage of comprehensive global risk intelligence

We employ a rigorous investigative process to provide comprehensive databases of high-risk individuals and legal entities. The process includes a thorough sequence of research, vetting and data compilation that leverages our unmatched network of global research experts supported by over 500 researchers with fluency in over 50 languages, placed strategically across 5 continents. Our automated REP monitoring and detection systems provide 24/7 awareness of relevant risk events that could impact your business.

With WorldCompliance™ data your business can flexibly access continuously updated data that fits into screening workflows to help you:

- 1 ▶ Connect to extensive databases which encompass over 4 million profiles of individuals and companies.
- 2 ▶ Increase visibility into global REP profiles from over 30,000 leading worldwide feeds.
- 3 ▶ Simplify screening for PEP and their family members and associates by easily filtering only the data that is relevant to your requirements.



The combination of our precise, proven processes and deep research expertise gives you the confidence to rapidly recognize risk.

Simplify your risk-based account screening program

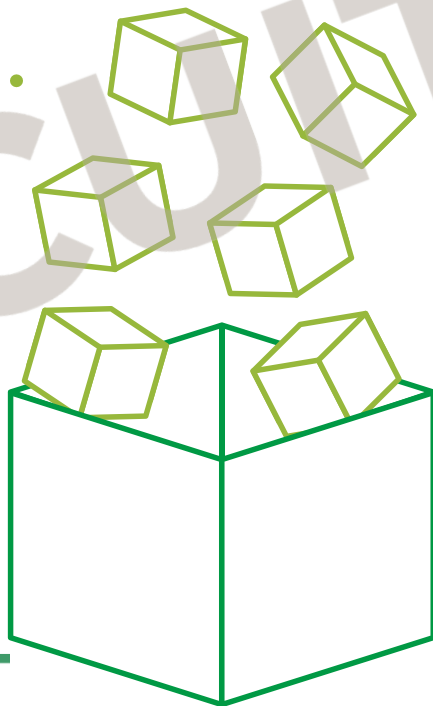
Firco enhanced data can be used to support a risk-based approach that helps your business navigate shifting sanctions, compliance and anti-bribery obligations by fortifying screening with a comprehensive database of sanctions, enforcements, Politically Exposed Persons (PEPs) and Reputationally Exposed Persons (REPs).

Efficiently control the impact of changing compliance expectations

Clarify risk by specific categories

Count on the advantage of comprehensive global risk intelligence

Capture the advantage of precise sanctions perspective



Clarify risk by specific categories

Sanctions and Enforcements	Configurable sanctions lists based on your risk profile and geographical operations
Entities Associated with Sanctions	Includes family members and associates of sanctioned entities, branches and operational units of sanctioned banks/entities.
Politically Exposed Persons	Comprehensive database of PEPs, as well as those of their family members and associates.
Reputationally Exposed Persons	Extensive database of profiles that have been linked to illicit activities from over 30,000 news feeds globally.
State Owned Enterprises	A proprietary list of government-owned and government-linked corporations and businesses.
Registration Data	Helps identify entities that have registered with a government body for the purpose of complying with their rules and regulations.
Marijuana Registered Businesses	Listing of all officially US state-licensed or marijuana registered businesses for recreational or medical use.
Money Service Business	Lists of Money Service Businesses (MSBs) registered with the United States or United Arab Emirates governments.
IHS Registered Vessels	A list of vessels flagged to certain high-risk countries sourced from IHS Markit (official manager of IMO ship identification numbers).

Configure a PEP/REP Screening Program fit for you

Launching later this year, focus your PEP/REP screening program on the entities that represent the greatest risk to your business

Starting with the full
WorldCompliance
dataset

Rules based
on Risk Categories,
Countries, Levels,
other attributes (e.g.
deceased date)

A customized
dataset suited to
your EDD policy

Content Development Practices



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Global Research Centers

- > 500 Researchers
- 8 research centers
- 57 languages
- Language redundancy
- Geopolitical knowledge
- Cultural and Linguistic knowledge



Training Data Researchers

12 Weeks of Training for each researcher

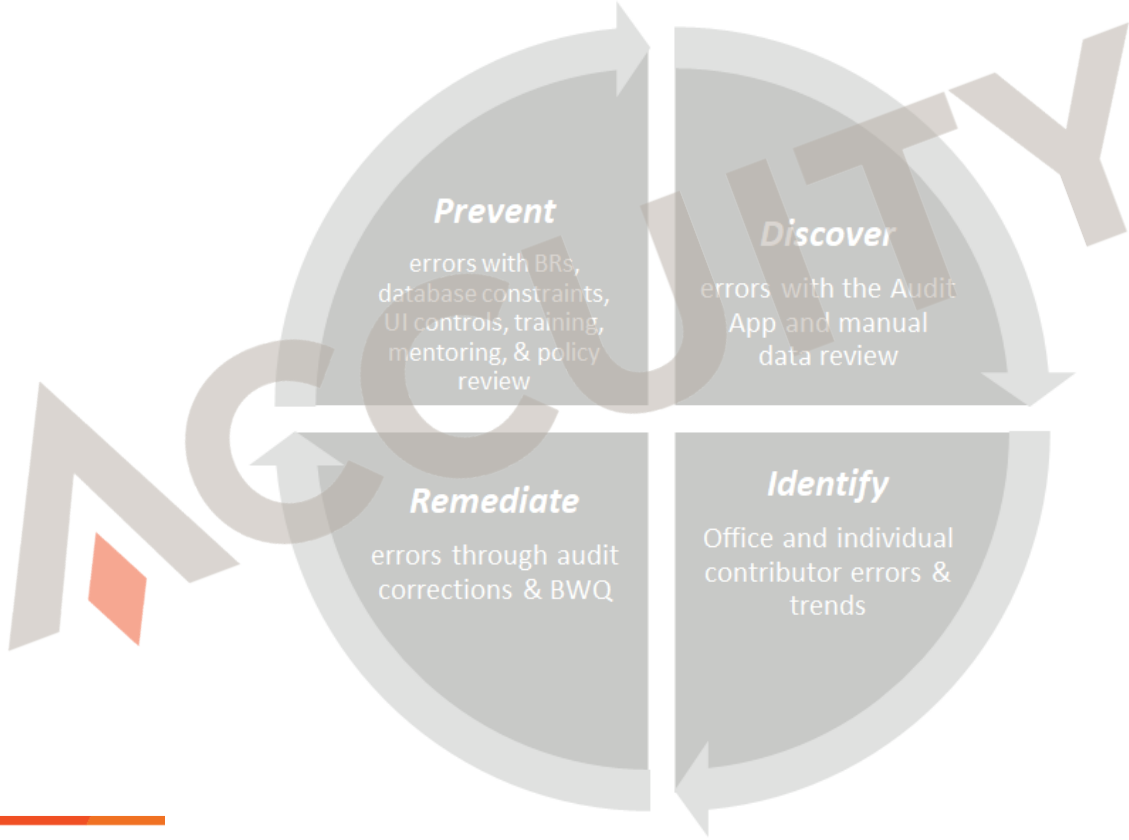
- Research methods
- Lateral search strategies
- Source evaluation
- Document interpretation
- Use of internal systems
- Real-world scenarios and applications

Organization

- Location
- Regional and country coverage
- Language skills
- Business continuity considerations



The Quality Assurance Cycle

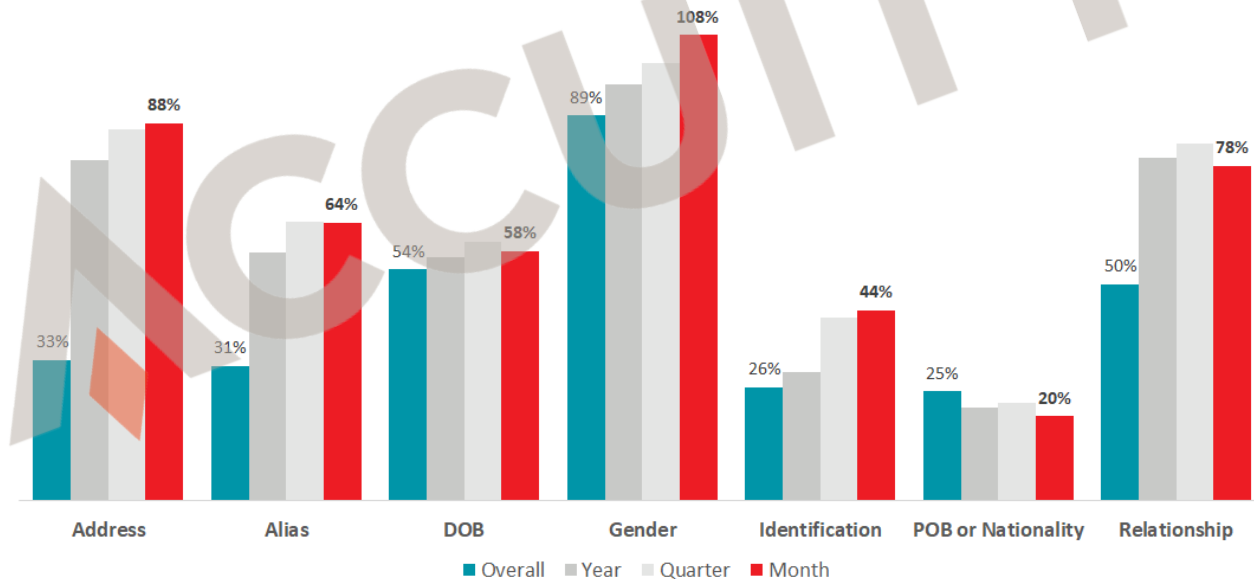


Hyper focus on improving PII coverage for PEPs and REPs

Measure Calculation:

Entities receiving the attribute for the first time during the period

New entities during the period



Key Takeaways



Trends in sanctions require constant focus and a partnership with a reputable data provider



The Accuity focus on delivering a more granular, configurable PEP/REP Dataset will help manage risk and address issues with False Positives



Continued investment in data development drives high quality and innovative datasets

Thank you for your attention

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