Visual Compliance: Incident Manager Guidance

Assessing Matches in Visual Compliance

- 1. Visual Compliance List of Authorities Screened
 - a. Politically Exposed Persons (PEP) not restricted party list: no additional action needed release from holding queue
 - b. Other lists screened possible legal restrictions / reputational risk: false positive analysis required
- 2. False Positive Analysis: assessing the quality of the match
 - a. **Individual vs. Entity Match**: if the name in your transaction is an individual while the name on the restricted party list is an entity (*e.g.*, company, organization, vessel) or vice versa: false positive release from holding queue
 - b. Individual Match:
 - Full legal name: if full legal names differ: false positive release from holding queue
 - 1. If the name in the public record has more specificity than Columbia's record, request full legal name of party. For example -

Public Record	CU Record	Additional Info Needed
Susie J. Lamar	Susie Lamar	Middle name
Thomas Phillip O'Neill	Tip O'Neill	Full first name, middle
		name
Christopher Matthews	Chris Matthews	Full first name

- ii. If full legal names match, additional due diligence is recommended
 - 1. Date of Birth ("DOB"): if DOBs differ: false positive release from holding queue
 - 2. If DOB is not listed in the public record, review the public record to determine what other information is listed (e.g., street address, state, country, nationality, place of birth) and compare with the information you have. If necessary, request additional information from the party in order to compare it with information in the public record.
 - a. If there are no similarities or exact matches: false positive release from holding queue
 - b. If there are similarities or exact matches: insufficient information to make false positive determination or true match escalate for review (see below, "2.d: Insufficient Information for False Positive Determination" and "2.e: True Match")
- c. Entity Match: Additional due diligence is recommended for all matches

- i. Review websites to determine if the matched entities are the same or affiliated with one another (*e.g.*, parent/ subsidiary). If the entities differ <u>and</u> are not affiliated with one another: false positive release from holding queue, *or*
- ii. If state of incorporation/ business registration or date of incorporation/ business registration differ <u>and</u> the matched entities are not affiliated with one another: false positive release from holding queue
- iii. If matched entities are affiliated with one another, escalate for review (see below, "2.d: Insufficient Information for False Positive Determination" and "2.e: True Match")
- d. Insufficient Information for False Positive Determination: escalate to RCT.
 - i. Match remains in holding queue until further notice. RCT will advise on next steps.
- e. True Match: escalate to RCT.
 - i. RCT will conduct a risk assessment:
 - 1. Legal restrictions
 - 2. Reputational Risk
 - ii. Match remains in holding queue until further notice

3. <u>Incident Manager</u>

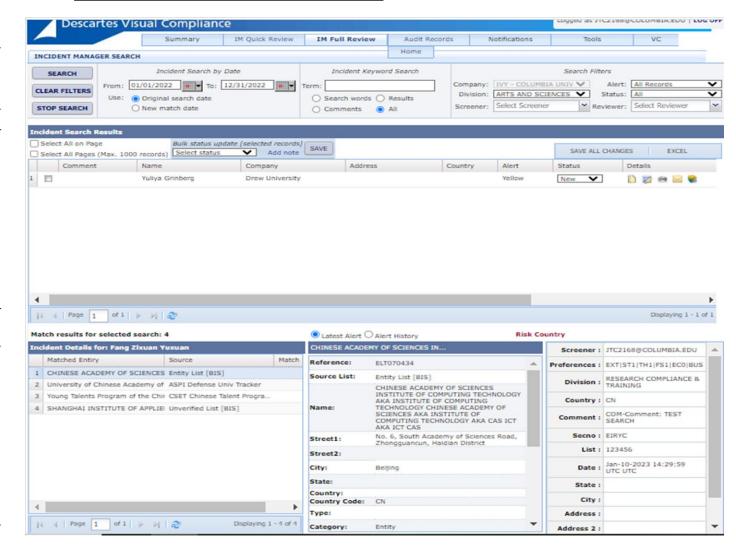
- a. **False Positive "CLEAR"**: When match is determined to be a false positive: manually check "CLEAR" in the Incident Manager Status field
 - i. Incident Manager Notes section: Include information used in false positive analysis (e.g., middle initial, year of birth) in Notes section, or reference information in public record/ search record that was used in false positive analysis (e.g., "street address and state differ")
 - Information in Incident Manager Notes will assist with dynamic screening false positive determinations in the future
- b. **Escalated for further review "ESCALATE"**: When an additional review is needed: manually check "ESCALATE" in the Incident Manager Status field
 - i. Email: Use the IM mail feature to notify RCT of the match and the necessity of further review
 - ii. What happens next: match remains in the holding queue until further notice
- c. **Review Complete, ok to proceed "CLEAR"**: When a review is complete and the determination is that the activity <u>will move forward</u> manually check "CLEAR" in the Incident Manager Status field.
 - Notes: Use the IM notes feature to record the following comment: "RCT Review complete – ok to proceed"
- d. **Review Complete, not moving forward "CLOSE":** When a review is complete and the determination is that the activity <u>will not move forward</u> manually check "CLOSE" in the Incident Manager Status field.
 - Notes: Use the IM notes feature to record the following comment: "RCT Review complete – not moving forward"

INCIDENT MANAGER USER INTERFACE

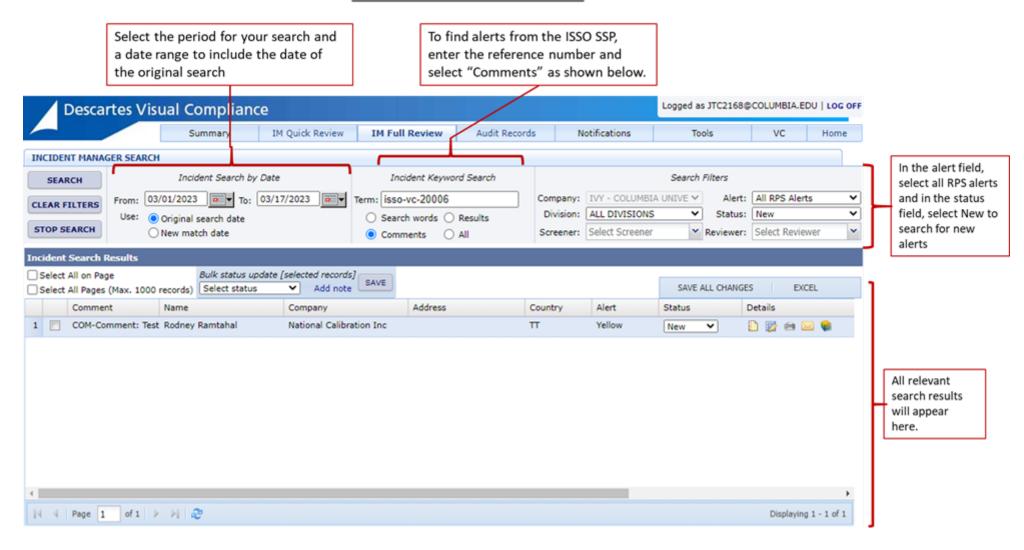
IM Search
Used to tune the parameters of your search

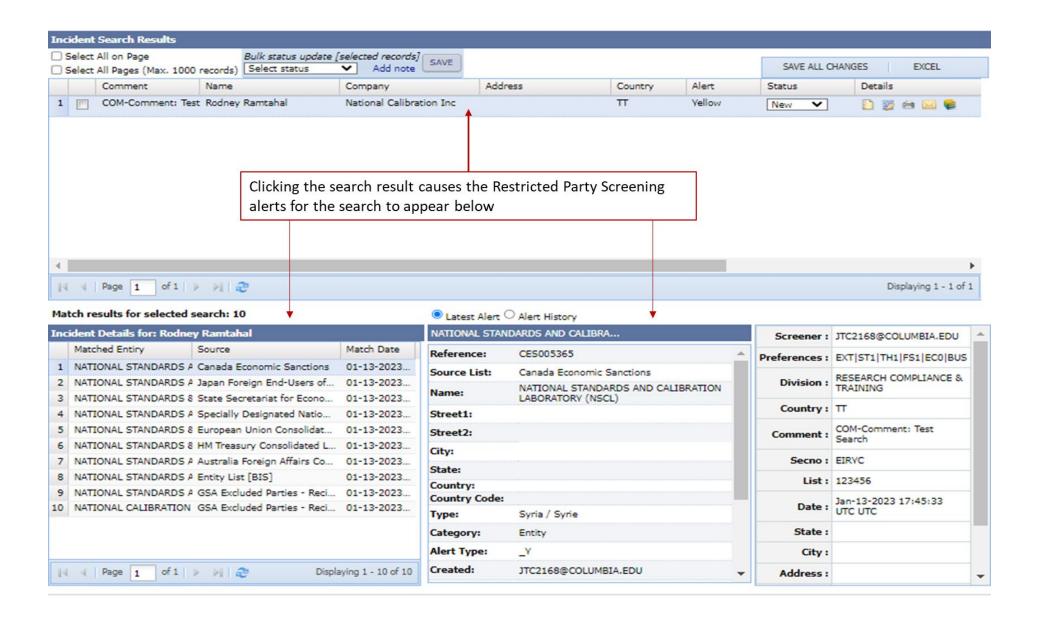
IM Search Results
The results of your
search appear here

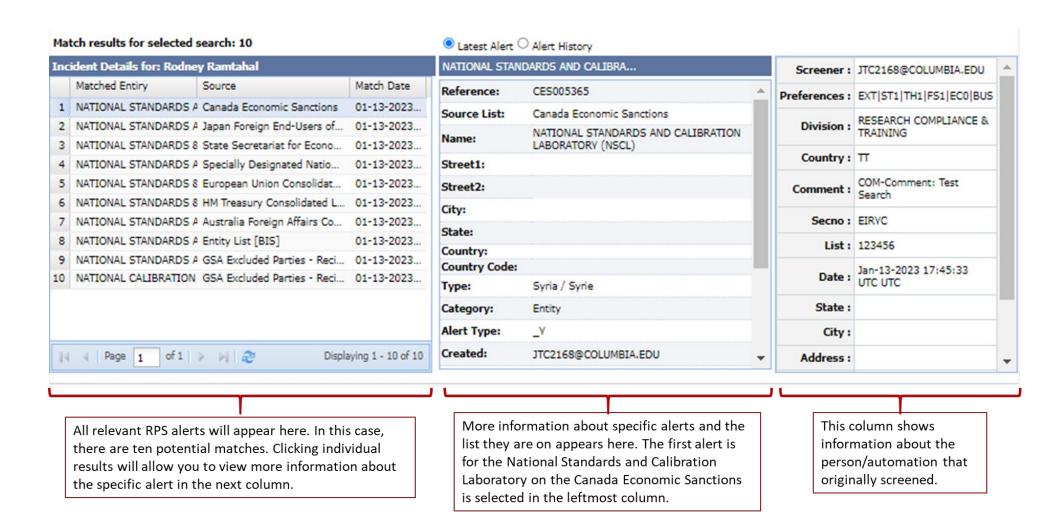
Incident Details
The detailed
information related to
Restricted Party alerts
appears here



INCIDENT MANAGER SEARCH

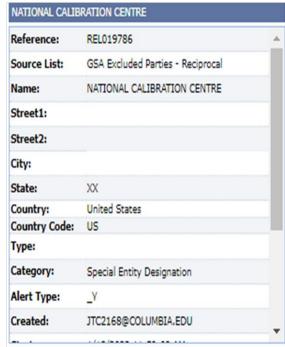






REVIEWING ALERTS





Review each alert to determine if the result is a real match or false positive by comparing relevant information such as:

- 1. Full name of company/institution/person
- 2. Location of company/institution/person
- 3. Date of business registration/Date of Birth

Note: The amount of information provided in an RPS alert differs depending on the Restricted Party List. Sometimes all you may have to go on is the full name of the entity or individual.

If you are able to rule the alert(s) as a false positive proceed to clear the alert and resume the workflow.

If you believe that the alert(s) is a real match or you are unable to determine that the alert(s) is a false positive escalate the RPS alerts for review by RCT.

CLEARING RPS RESULTS

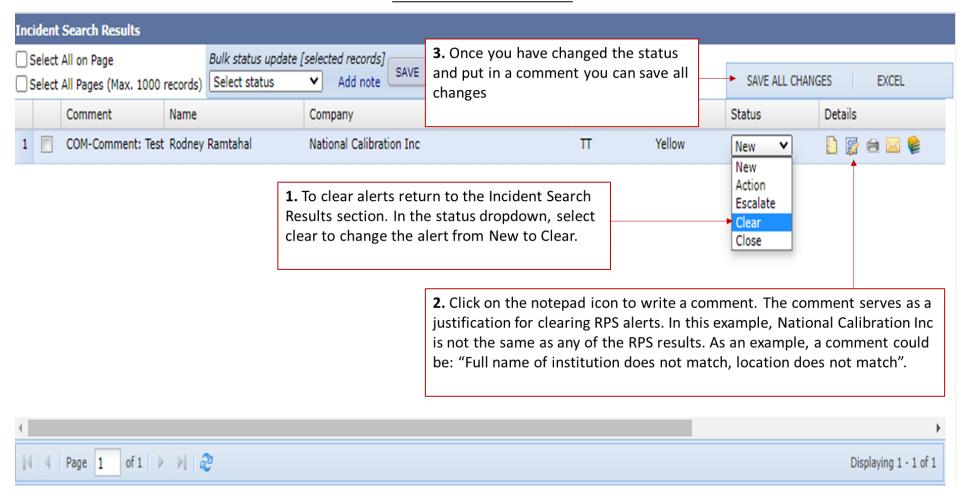




In this example, we searched for National Calibration Inc in Trinidad and Tobago. 9 out of 10 alerts are for the National Standards and Calibration Laboratory in Syria and 1 alert is for the National Calibration Center in the United States.

Since neither the full company name nor the location of the company match, we can rule out these alerts as false positives.

CLEARING RPS RESULTS





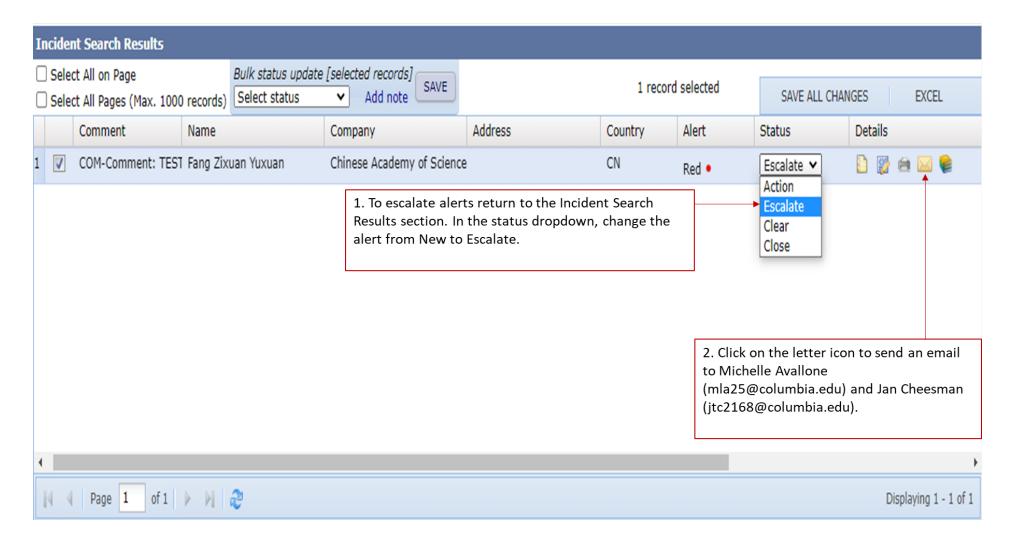






Now, let's assume there was a real match and we need to escalate the results. Perhaps we were searching for the Chinese Academy of Sciences, Institute of Computing Technology.

There is one real match out of the four alerts.



When you click the letter icon an email box will appear to send the RPS results. Enter the addresses into the "send to this address field" and write a note in the Notations field with your query. Hit Mail and once "Email Sent Successfully" appears hit close.

Note: To send emails to multiple people, the addresses must be separated by a comma, not a semicolon.

