



Prime Databank

Service Description

FIS Risk, Fraud and Compliance Solutions

Terms of Use

The information set forth in this service description contains proprietary and confidential information concerning FIS and its products. By accepting this information, you agree to keep this SPD and the information described here-in confidential, and that you will not disclose the confidential information to a third party or use it for any unauthorized purpose.





Prime Compliance Suite Databank provides the latest updates to sanctioned party lists and enriches it with supplemental data and name transformations to facilitate thorough filtering.

About Prime Databank

To comply with sanctioned party regulations, institutions must continually update their lists of sanctioned parties, fraudsters, and political officials as government agencies issue updates and world events unfold. FIS provides a service to keep institutions current with these changes: the Prime™ Compliance Databank. The Prime Compliance Databank provides the latest updates to sanctioned party lists and enriches it with supplemental data and name transformations to facilitate thorough filtering.

FIS has established a Data Services organization dedicated to producing the best data possible for use in filtering applications. To do so, FIS provides extensive information optimized for real-time transaction filtering, client file searches and identity verification. Our databases provide details on OFAC and worldwide sanctions, politically exposed persons, and persons charged with financial fraud. The standard lists provided by governments and other organizations (including FIS) are enhanced in a variety of ways to ensure that the data will allow the filtering process to be as effective as possible. As a vendor of products that use this data, FIS is in a position to optimize both our software and data content to create very powerful and effective filtering algorithms that will best suit the needs of our clients.

Data Quality

FIS takes great care to perform quality assurance on every list and update sent to clients. Occasionally, the published data from issuing agencies has issues with formatting or consistency. FIS takes steps to clean up anomalies in the data in order to prevent operational issues at client sites.

Data Enhancements

FIS employs a variety of algorithms that standardize and transform sanctioned party names in an effort to facilitate the most thorough filtering possible. For additional quality assurance, FIS personally scrutinizes machine-generated name transformations, keywords, and terms to ensure they are relevant to the filtering process.

Data Research

As part of its focus on data, FIS's data staff researches and develops new data. FIS researchers investigate individuals and organizations in order to continually supplement lists that contain FIS-compiled information. Data compiled by FIS is subject to spot checks and quality assurance reviews.

The Data Services staff works to develop new tools and techniques to gather data from publicly available sources, continually refining the process and validating their results. A URL is cited for every piece of information collected and the information is archived in a data repository at FIS. The gathered information is eventually compiled for incorporation into FIS's data publication processes, where the data is cleansed and re-examined.



DISTRIBUTION OPTIONS

FIS makes its data distributions available to clients either via secure downloads from its web site, or by sending emails that contain the updated data files. Additionally, an “auto load” program is available that will run at a client site and scan FIS’s servers for subscription updates. Once an update is detected, the updates are copied to the client’s server and loaded for use. The updated files will then be used the next time filtering takes place.

Standard

Changes to the U.S. Department of the Treasury’s OFAC list serve as the driver for sending out distribution updates. FIS will deliver the latest data distribution list within 1 business day of a change made by the U.S. Treasury, provided that the change occurs and we are notified of it by OFAC before 6:00 PM. In the event of unforeseen circumstances, the distribution will be delivered within 3 business days of a change made by the U.S. Treasury.

Data on Demand

FIS’s “Data on Demand” distribution option allows users of Version 7.1.2 of the product and higher to receive data distributions when any of the government sanction lists to which they subscribe is updated. In contrast to the “standard” distribution option described above, the distribution of a change to the UN Consolidated List, for example, is not dependent upon a change to the OFAC list with the Data on Demand option. Such updates will be made available within 1 business day of a change made by the sanctioning body and within 3 business days in the event of unforeseen circumstances. Users of this service must employ the “auto load” functionality to receive data on demand distributions.

FORMAT OPTIONS

FIS’s Databank Distribution System allows for the specification of various output formats. This capability permits clients to take advantage of any of FIS’s enhanced data offerings discussed above without having to modify existing software or

processes. Data lists can be generated to conform to clients’ existing specifications, whether for an internally developed system or to supplement/replace data received from an external source.

Single File Format

Clients using any of the Prime Compliance Suite products are able to take advantage of our standard distribution files, which are optimized for use by our products. These files are highly compact and contain all of the data elements that could be used by our clients and our software. These files also allow for easy enabling of any of our data subscription lists with the entry of registration codes.

Prime Standard Format

FIS has developed a simple output format that emulates the format published by the United States Treasury’s Office of Foreign Asset Control (OFAC) for use by clients currently using that format natively. The specifications for this list may be obtained through your sales representative.

Prime XML Format

FIS has developed an XML output format for use by clients that require a data-only solution. Since the output is in XML, standard tools can be used to consume the data, making this a convenient and effective way for clients to implement their data needs. The specifications for this list may be obtained through your sales representative.

Clearing House Format

An output format conforming to the format used by The Clearing House, the oldest and most established payments association and processor in the United States serving more than 1,200 financial institutions, has been made available. While the Clearing House is only concerned with the OFAC list, any of FIS’s other lists may be output in a compatible format. This allows Clearing House clients to take advantage of a variety of options while maintaining their existing infrastructure.

Other Formats

FIS’s Databank Services has the capability of publishing data in client-specified formats (given



specifications), for an additional charge. Clients can then receive any or all of the available lists in their desired format. Please contact your Sales or Professional Services representative for more details.

DATABANK LICENSE

Distribution lists are offered under a yearly subscription fee and includes both support and free updates.

PRIME IQ

PrimeIQ (Prime™ Internet Query) is an Internet-based service that allows anyone with Internet access to verify a name against the Prime Compliance Databank. PrimeIQ allows users to enter a name and determine whether there is possible match on that party's name. If a potential match is found, users can examine detailed information about individuals to determine whether the two individuals are the same person.

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U.S. and Americas Sanction Programs

OFAC LIST

The Office of Foreign Assets Control (OFAC) of the U.S. Department of the Treasury publishes a list of sanctioned individuals and organizations which includes foreign countries, terrorists, international narcotics traffickers, and those engaged in activities related to the proliferation of weapons of mass destruction. FIS enriches OFAC's frequently updated master list of Specially Designated Nationals (SDNs) and Blocked Persons to offer our customers the best possibilities to detect these sanctioned parties.

The SDN distribution contains the original text received from the U.S. Treasury as well as identifying fields:

- Entity Name
- Entity Address
- Sanctioned Country
- Entity Type
- Vessel Details
- Shipping Company of Vessel
- AKA's, FKA's, and NKA's

Recipients of the OFAC list will also receive FIS-added entries:

CHIPS UIDs of Sanctioned Parties

CHIPS is the leading real-time, final settlement payments system for business-to-business transactions, clearing and settling U.S. dollar payments processing for many banks in the U.S. and abroad. The Universal Identification Number (UID) is a unique identifier that tells the CHIPS system what private account and bank information to use for processing payments.

SWIFT TIDs of Sanctioned Parties

More than 7,000 financial institutions in 197 countries connect to one another through SWIFT. These institutions exchange millions of messages

valued in trillions of dollars every business day. FIS supplies a list of SWIFT TIDs of sanctioned parties, so that they may be detected in transactions.

Key Words

FIS generates "key words" from the names of entities found in SDN lists. These words can be effective in detecting organizations that may be party to a transaction.

Cities, Airports, and Seaports in Sanctioned Countries

FIS enhances the standard data offerings by providing lists of major cities, airports, and seaports in sanctioned countries. This list is categorized in such a way that they may be removed if they are not desired.

BIS DENIED PERSONS LIST (DPL)

The Bureau of Industry and Security (BIS) of the U.S. Department of Commerce is responsible for the regulation of exports for national security, foreign policy, and nonproliferation reasons, as well as the enforcement of those regulations. BIS's Export Enforcement program seeks to prevent the illegal export of dual-use items before they occur; investigate and assist in the prosecution of violators of the Export Administration Regulations (EAR) and the Fastener

Quality Act (FQA); and inform and educate exporters, freight forwarders, and manufacturers of their enforcement responsibilities under the EAR and FQA.

The BIS Denied Persons List (formerly known as the Denial Orders List or the DOL List) lists individuals who have been denied export privileges in whole or in part.

BIS ENTITY LIST

The Bureau of Industry and Security's Entity List lists people who have been determined to present an unacceptable risk of proliferating capabilities to develop weapons of mass destruction or the missiles used to deliver those weapons.



BIS UNVERIFIED LIST

The Unverified List from the Bureau of Industry and Security contains the names and countries of foreign persons who in the past were parties to transactions where the U.S. Government could not conduct a pre-license check or a post-shipment verification. A transaction with anyone listed on the Unverified List is subject to BIS scrutiny, regardless of where the person is located in the country included on the list.

CIA LIST

The United States Central Intelligence Agency publishes a directory entitled “Chiefs of State and Cabinet Members of Foreign Governments”. This directory allows you to identify people in high-ranking political positions.

CURRENCY CODES

FIS includes the ISO currency codes for the currencies of sanctioned countries. They allow you to detect transactions conducted in a currency from a sanctioned nation.

DOS TERRORIST EXCLUSION LIST

Under Section 411 of the USA PATRIOT Act, the U.S. Department of State (DOS) is authorized to designate terrorist entities for immigration purposes. The Terrorist Exclusion List (TEL) is the list of those entities, and is maintained by the DOS for Homeland security purposes. An organization is placed on the TEL if it commits, plans to commit or supports terrorist activity. A person who is associated with any entities listed on the TEL may be found “inadmissible” to the United States, resulting in them being prevented from entering the United States, or if already in the country, they may face deportation.

DTC DEBARRED PARTIES LIST

The Directorate of Defense Trade Controls (DTC) is charged with controlling the export and temporary import of defense articles and defense services covered by the United States Munitions List. It is involved in acting on license applications for defense trade exports and handling matters related to defense trade compliance, enforcement, and reporting, among its other functions. The DTC List is a list of those persons and organizations that are

listed as debarred parties by the Directorate of Defense Trade Controls of the U.S. Department of State.

FBI TEN MOST WANTED LIST

The investigation of violations of federal criminal law and the protection of the United States from foreign intelligence and terrorist activities are part of the mission of the United States’ Federal Bureau of Investigation (FBI). While the FBI typically seeks approximately 12,000 fugitives from justice at any one time, the Ten Most Wanted Fugitives List is their compilation of who they believe to be the ten most dangerous fugitives.

INTER-AMERICAN DEVELOPMENT BANK (IDB) LIST OF SANCTIONED FIRMS AND INDIVIDUALS

The Inter-American Development Bank (IDB) lends money and provides grants in 26 countries of Latin America and the Caribbean. The IDB’s Sanctions Committee produces a list of organizations and individuals that are ineligible to be awarded contracts financed by the IDB for the periods indicated, due to the fact that they were found to have engaged in a fraudulent or corrupt practice in violation of the Bank’s anti-corruption policies. Any firm or individual who directly or indirectly controls a debarred firm or any firm that the debarred firm directly or indirectly controls is also ineligible from receiving funding through the IDB, as is any firm which a debarred individual directly or indirectly controls.

NS-PLC LIST

The United States Department of the Treasury has authorized U.S. financial institutions to reject transactions with individuals on the NS-PLC list. The list is comprised of members of the Palestinian Legislative Council (PLC) who were elected on the party slate of Hamas, or any other organization that has been designated by OFAC to be a Foreign Terrorist Organization (FTO), Specially Designated Terrorist (SDT), or Specially Designated Global Terrorist (SDGT), provided that any individuals involved are also not on OFAC’s SDN List (in which case their transactions must be blocked). This list is included for all OFAC list customers.



OSFI LIST

The Canadian Government's Office of the Superintendent of Financial Institutions (OSFI) is the primary regulator of federally chartered financial institutions. OSFI is responsible for supervising and regulating all banks, and all federally incorporated or registered trust and loan companies, insurance companies, cooperative credit associations, fraternal benefit societies and pension plans. Regulations mandate that every Canadian financial institution and foreign branch operating in Canada review their records on a continuing basis for the names of individuals listed in OSFI's *Schedule to the Regulations*, and report their findings on a monthly basis.

SPECIAL ECONOMIC MEASURE ACT

Canada's Foreign Affairs and International Trade Canada bureau's Special Economic Measures Act (SEMA) authorizes the Governor in Council to seize, freeze, or sequester property in Canada of a foreign state or of its citizens who do not reside in Canada. The Governor in Council may also prohibit persons in Canada or Canadians outside Canada from dealing in property of that foreign state (or with its residents or nationals). This includes the export, sale or shipment of goods to that foreign state, and the importation of goods from that nation or from providing or acquiring services to or from that foreign state, as well as the transfer of technical data to that foreign state or the acquisition of or supply of services to the nation of its nationals. Restrictions may be also be imposed on vessels or aircraft from that foreign state coming to Canada and Canadian vessels or aircraft going to that foreign state. The SEMA List contains information about the entities covered under the SEMA regulations.

WEAPONS OF MASS DESTRUCTION (WMD) TRADE CONTROL REGULATIONS

In 1994, an Executive Order was issued in the United States to impose an import ban on foreign persons determined to have engaged in activities related to the proliferation of weapons of mass destruction. These regulations prohibit the direct or indirect importation of any goods, technology, or services into the United States that were produced

or provided by the foreign persons designated in this list.

Global Sanction Programs

INTERPOL LIST

The Interpol List contains a list of individuals who are wanted by Interpol, the International Criminal Police Organization. All of the individuals on this list are the subject of an Interpol "Red Notice", signifying that they are wanted by national jurisdictions or international criminal tribunals, with the goal of identifying and locating those persons so that they may be arrested and extradited. This list contains information from those Red Notices approved for public dissemination, which is a fraction of the total number of Red Notices that have been issued. Those listed are wanted for serious crimes, but are considered innocent until proven guilty.

ISRAELI DECLARATIONS LIST

The Israel Money Laundering and Terror Financing Prohibition Authority provides this list of organizations that have been declared to be part of money laundering- and terror financing-related crimes.

UN CONSOLIDATED LIST

The Security Council of the United Nations is empowered to take enforcement measures to maintain or restore international peace and security under Chapter VII of their charter. One such enforcement measure is the imposition of sanctions, including economic and trade sanctions, arms embargoes, travel bans, and other financial or diplomatic restrictions. In an effort to gain adherence to their objectives, the Security Council has imposed sanctions on individuals and organizations through a variety of resolutions. FIS has compiled the salient resolutions into a single list against which financial organizations can filter their customers and/or transactions.



European Sanction Programs

BANK OF ENGLAND CONSOLIDATED LIST

The Bank of England, the central bank of the United Kingdom, regularly publishes lists of individuals and organizations against which financial sanctions have been imposed. This list contains detailed information about each entity, including detailed name and address information.

EU CONSOLIDATED LIST

The European Union (EU) has released a consolidated list of persons, groups and entities subject to Common Foreign Security Policy (CFSP) related financial sanctions. This database is maintained by the EU to assist the members of the EU Credit Sector Federations in their compliance with financial sanctions.

GUERNSEY FINANCIAL SERVICES COMMISSION

The Guernsey Financial Services Commission, the regulatory body for the finance sector in the Bailiwick of Guernsey, regulates and supervises financial services in Guernsey. The Guernsey List contains sanction orders that prohibit the provision of finance or financial services to named individuals or entities, as well as prohibition orders that require financial institutions to ensure that a specified regulated activity is not performed by a person who is prohibited from doing so by a prohibition order.

HER MAJESTY'S INVESTMENT BAN LIST

The United Kingdom has issued Her Majesty's Investment Ban List (Council Regulation (EC) No 194/2008), which places further financial restrictions on investments in businesses owned or controlled by persons or entities associated with the military regime of Burma/Myanmar. This regulation requires that financial institutions freeze funds and investments intended to benefit persons or entities associated with the military regime in that country,

and includes new restrictions on particular imports, exports, and investments in Burma/Myanmar.

IRISH FINANCIAL SERVICES REGULATORY AUTHORITY

The Irish Financial Services Regulatory Authority (IFSRA) is responsible for the regulation of all financial services firms in Ireland. IFSRA seeks to provide consumer protection, preserve consumer rights, promote a sound financial system, and nurture the developing credit union sector in Ireland. In accordance to the Investment Intermediaries Act of 1995, it is a criminal offense for an investment firm to operate in Ireland unless it has the appropriate authorization from the Irish Financial Services Regulator Authority. IFSRA publishes a list of those firms that operate as investment business firms in Ireland without appropriate authorization.

ISLE OF MAN GOVERNMENT

The Isle of Man Government (IOM) List asserts the island's commitment to fulfilling its international obligations by issuing comprehensive measures through the use of sanctions, and by denying those believed to be associated with terrorist organizations the access to the financial system. As part of its obligations, financial institutions doing business in the Isle of Man must freeze the accounts of any person or organization on the IOM List, and report such actions to the Customs and Excise Division of the Treasury.



Asia Pacific Sanction Programs

AUSTRALIAN DEPARTMENT OF FOREIGN AFFAIRS AND TRADE (DFAT) LIST

Two of the stated goals of Australia's Department of Foreign Affairs and Trade are to strengthen global cooperation in ways that advance Australia's interests and to enhance Australia's security. Towards that end, the Australian DFAT list is published in an effort to freeze the assets of terrorists, and those in the former Iraqi regime, by making it a criminal offense for persons who hold assets that are owned or controlled by persons or entities on the list, or to use or deal with those assets.

HONG KONG MONETARY AUTHORITY (HKMA) LIST

Hong Kong Monetary Authority (HKMA) is the government authority in Hong Kong responsible for maintaining monetary and banking stability. In its supervisory capacity, the HKMA ensures that its banks have adequate policies, procedures and controls in place to combat money laundering and terrorist financing. Institutions that find that they have done business with individuals or entities on the HKMA List are required to report such activity to the HKMA and Hong Kong's Joint Financial Intelligence Unit, which is operated by the police and the Customs and Excise Department.

MONETARY AUTHORITY OF SINGAPORE (MAS) LIST

The Monetary Authority of Singapore (MAS) administers various statutes pertaining to money, banking, insurance, securities and the financial sector in general for the country of Singapore. As part of its function, it issues a list of those individuals and organizations that have been sanctioned by the government of Singapore. Dealing with any of those cited on the MAS List can lead to fines, criminal penalties and increased regulatory scrutiny for financial institutions operating in that country.

NEW ZEALAND POLICE (NZP) LIST

The New Zealand Police (NZP) is New Zealand's agency responsible for reducing crime and enhancing community safety. In this capacity, it is the responsibility of the NZP to maintain the list of terrorist entities designated by the UN Security Council Regulations against the Taliban and Al-Qaida, as well as those designated under the Terrorism Suppression Act 2002. The NZP List lists all individuals and organizations designated by New Zealand as terrorist entities under the provisions of the Terrorism Suppression Act 2002.

RESERVE BANK OF AUSTRALIA (RBA) LIST

The Reserve Bank of Australia (RBA) administers sanctions as specified in the Banking (Foreign Relations) Regulations 1959. Whereas the responsibility of DFAT is to maintain and publish the Australian government's list of terrorists and their sponsors, as well as those in the former Iraqi regime, it is the responsibility of the RBA to maintain and publish the sanctions lists of those in the former government of the Federal Republic of Yugoslavia, ministers and senior officials of the Government of Zimbabwe, and entities associated with the Democratic People's Republic of Korea (North Korea). Transactions involving the transfer of funds or payments involving any person or organization on this list Annex are prohibited without prior authorization from the Reserve Bank of Australia.



AML and Know Your Customer Lists

FATF-NCCT

The Financial Action Task Force on Money Laundering (FATF) identifies non-cooperative countries and territories (NCCTs) in the effort to prevent money laundering. They have developed a process to uncover critical weaknesses in anti-money laundering systems which serve as obstacles to international co-operation. By ensuring that all financial centers adopt and implement measures for the prevention, detection and punishment of money laundering according to internationally recognized standards, the vulnerability of the financial system to money laundering can be reduced.

The FATF lists contains a list of NCCT countries that the FATF asks its members to request financial institutions give special attention to businesses and transactions with persons, including companies and financial institutions, in these countries or territories. This is done to pressure these countries to enact legal reforms.

FATF AML/CFT LIST

The Financial Action Task on Money Laundering (FATF) identifies countries that have strategic AML/CFT deficiencies and pose a risk to the international financial system. The countries on this list have not developed a sufficient action plan with the FATF, and the FATF has determined that strategic AML/CFT deficiencies remain. The situations differ among each jurisdiction. The FATF continues to identify additional jurisdictions, on an ongoing basis, that pose a risk.

MSB LIST

The MSB List is a listing of all money service businesses that have registered with FinCEN. Due to the nature of their business, money services businesses (MSBs) pose a serious money laundering concern. It is up to organizations conducting financial dealings with such entities to know their customers and identify any MSBs that are customers or prospective customers. Once MSBs have been identified, an organization to assess and

manage their level of risk in dealing with such customers accordingly.

OECD TAX HAVENS

The Organisation for Economic Co-operation and Development (OECD) is a group of 30 member countries that deal with economic and social policies. They may form agreements to act in a formal way-- for example by establishing legally binding agreements to crack down on bribery, or codes for free flow of capital and services. The OECD's Committee on Fiscal Affairs has identified the countries on their list as practicing harmful tax practices, thereby deeming them uncooperative tax havens.

POLITICALLY EXPOSED PERSONS (PEPS)

Financial institutions are required to be aware of dealings with "Politically Exposed Persons". The term Politically Exposed Persons ("PEPs") applies to those individuals who perform public functions for a government or administrative body, members of ruling royal families, as well as influential people in religious organizations that have a sphere of influence over political, military or judicial matters. The family and close associates of Politically Exposed Persons are also of interest.

Since the financial transactions of individuals identified as PEPs and their associates may be of interest to those organizations acting as their agent, it is incumbent upon you to know your customers and identify PEPs with which you do business.

FIS derives PEP information from publicly available sources and screens it for quality:

- Name
- Aliases
- Related PEP (for family/associates)
- Relationship to PEP (for family/associates)
- Date of birth
- Date of death
- Place of birth
- Country of residence
- Political Party



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- Date of listing
- Other significant information
- Source of information

FIS derives PEP information from a combination of sources, including the CIA's Chiefs of State and Cabinet Members of Foreign Governments directory, web sites of governments from around the world, and publicly available articles. The level of officials covered in each country is dependent upon the availability of such information from credible sources (cited along with the information) in the public domain, and may vary from country to country. The information for each country is updated on a rotating basis, although world events sometimes dictate that a country be updated out-of-cycle.

PRIMARY MONEY LAUNDERING CONCERNS

Section 311 of the USA Patriot Act authorizes the United States Treasury to designate a foreign jurisdiction, financial institution, class of transactions, or type of account as being of "primary money laundering concern," and to impose "special measures" against them. The intent of this designation is to help ensure that the international financial system is not being abused by criminals.

Knowing those entities on the PMLC List is critical. U.S. financial institutions dealing either directly with the jurisdiction designated as one of primary money laundering concerns, or dealing with those having direct dealings with the designated jurisdiction must be concerned with special measures that they must take. These special measures involve information-gathering and record-keeping requirements, as well as possible prohibition from opening or maintaining a correspondent account or a payable-through account for such an entity.

Fraud Lists

FRAUD DATABASE

FIS collects fraud data from government, financial, and news sources. This data includes the names and, where available, other identifying information for those charged with financial misconduct.

FIS's fraud data includes covers many types of financial misconduct and is continually updated as events happen and new data sources are incorporated:

- Bank fraud
- Wire Fraud
- Money Laundering
- Securities Fraud
- Commodities Fraud
- Mail Fraud
- Insurance Fraud
- Embezzlement
- Financial Reporting Fraud
- Ponzi Schemes
- Credit Card Fraud
- Bankruptcy Fraud
- Financially Exposed Persons (FEPs)

Various banking consortiums have suggested that enhanced due diligence should be given to those individuals who have access to corporate wealth due to their positions within a corporation. Such individuals warrant identification and extra scrutiny as part of your "Know Your Customer" policy. FIS refers to these individuals as *Financially Exposed Persons* ("FEPs"), which applies to those individuals who hold executive management or board positions in the worlds' largest companies. FIS derives FEP information from publicly available sources, and includes discriminating information about each person, as well as a link back to the corporate web site with which they are affiliated.

GSA EXCLUDED PARTIES LIST SYSTEM (EPLS)

The General Services Administration (GSA) of the United States government maintains an Excluded Parties List System (EPLS) that lists individuals and organizations that are ineligible to receive Federal contracts, some subcontracts, and certain Federal assistance and benefits. The data on the listed parties include names, addresses, listing agencies, CT codes, and other codes as appropriate. While the EPLS List is maintained by the GSA, multiple



agencies contribute the information that comprises this list.

HHS LIST OF EXCLUDED INDIVIDUALS & ENTITIES

The United States Department of Health and Human Services (HHS) has established a program to exclude individuals and entities that have been the subject of legal actions from participating in Federally funded health care programs. Individuals and businesses on this list have been excluded for such reasons as convictions for program-related fraud, patient abuse, licensing board actions and defaulting on Health Education Assistance Loans. Granted this power by the Social Security Act, the Office of Inspector General (OIG) Exclusion Program mandates that payments cannot be made to any parties on this list by a Federal health care program, or for any goods or services provided by an excluded party.

OCC UNAUTHORIZED AND FICTITIOUS BANKS LIST

It is the role of the Office of the Comptroller of the Currency (OCC) to charter, regulate and supervise all national banks in the United States, as well as to supervise the federal branches and agencies of foreign banks. Among the OCC's powers is to take actions against banks that do not comply with laws or regulations, or engage in unsound banking practices. As part of their effort to ensure the safety and soundness of the national banking system, the OCC provides alerts regarding unauthorized or fictitious banks.

WORLD BANK LIST OF DEBARRED PARTIES

The World Bank List of Debarred Parties is a list of organizations and individuals that are ineligible to be awarded contracts financed by the World Bank for the periods indicated, due to the fact that they were found to have violated fraud and corruption rules. Any firm or individual who directly or indirectly controls a debarred firm or any firm that the debarred firm directly or indirectly controls is also ineligible from receiving funding through the World Bank, as is any firm which a debarred individual directly or indirectly controls.

Unlawful Internet Gambling List

The United States Congress passed the Unlawful Internet Gambling Enforcement Act of 2006, to prevent financial institutions and credit card companies from processing payments to settle bets made on the Internet. However, the United States Government does not provide a list of those sites and companies with which financial institutions are prohibited from transacting payments. In order to fill this void and to provide our clients with the ability to comply with this regulation, FIS provides a list of Internet gambling sites to allow financial institutions the ability to filter for these entities.

Disclaimer of Warranty

All data supplied by FIS pursuant to the Compliance Databank services is provided on an "as-is" basis, and FIS hereby disclaims any and all warranties, conditions, and/or representations (express or implied, oral or written) with respect to the data provided pursuant to the Compliance Databank services hereunder, including, without limitation, any and all implied warranties of accuracy, completeness, merchantability, or fitness or suitability for any purpose (whether or not FIS knows, has reason to know, has been advised, or is otherwise in fact aware of any such purpose), whether alleged to arise by law, by reason of custom or usage in the trade, or by course of dealing. The data is intended as one component of a due diligence process, and FIS shall have no responsibility for its use.