i**TRACK**RISK

AML . CTF . PEP . SANCTIONS . BRIBERY

Usable & accessible from anywhere

Web-based Solution

Cost Effective

Scalable & Flexible

Customisable Reporting

Secure

AN ONLINE **RISK ASSESSMENT** TOOL

Comsure ™

RISK ASSESSMENTS & SCREENING

In 2014 Comsure launched its unique "AML Client & Relationship Risk Assessments" and "Screening solution".

The solution was in development for 3 years and in 2014 Comsure selected dedicated users from both private and public sectors to test the robustness of the system – currently it is being used in Jersey, Malta and Mauritius.

iCompli

iTrackAML

iTrackPEP&Sanctions

The latest version of iTrackRisk provides:

✓ **ONE-STOP DATA ENTRY** – No moving between systems;

✓ **SINGLE DEPOSITORY** – No data leakage and access to all the data at any time;

✓ **RISK DATA** – Integrated sanction data (OFAC, UN, EU) as well as access to Dow Jones and/or World Check;

✓ **USE ANYWHERE** – If you can access the internet you can access iTrack through the secure iTrack cloud;

✓ **SECURE** – Hosted at the Foreshore [Jersey] data centre, the leading offshore hosting centre OR a location of your choice (inc. in-house);

✓ **NO MAINTENANCE** – Comsure looks after all the mechanics 24/7, 365 days a year;

✓ **COST EFFECTIVE** – compared to Manual Mechanisms iTrack pays for itself within months;

✓ **COST SAVINGS** – Saves time collating information – what takes days will now take minutes;

✓ **FIXED COST DATA** – Dow Jones and/or World Check fixed cost for low level screening.

The benefits are many but the following list provides the highlights:

✓ **ROBUST** data capture (e.g. passports, utility bills, corporate documentation);

✓ **ON BOARDING** solution for AML and FATCA risks;

✓ **ONE STOP** sanction (inc. OFAC,UN,EU) and high risk data (INC Dow Jones and World Check) screening;

✓ **BATCH** data screening all records and all risk assessments in the event of risk changes;

✓ **FLEXIBLE BESPOKE** risk assessments based on your perception of the nature and types of risk;

✓ **CENTRALISED** country risk lists;

✓ **RECORD AND CAPTURE** free flow relevant relationship profile information;

✓ **LIVE REPORTING** (e.g. pie, bar graphs) on all data held;

✓ **REFRESH** update and change any of the above at any time and retain a record of the change;

✓ **MLRO** reporting tool to allow immediate internal reporting;

✓ **DAILY** monitoring tool integrated into assessments.

All the above will help you save money and manage your "AML Business, Client, Relationship Risk Assessments" and "Associated Strategy" in a cost effective, logical and easy to use secure environment.

For more information and/or a demonstration contact iTrackRisk@comsuregroup.com

YOUR NEEDS

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WHO WOULD BENEFIT:

iTrackRisk has been developed to answer the AML needs of the following businesses:

Private Bank

Fund Services

Lawyers*

Trust & Corporate Service Provider

Non-Executive Directors

Accountants*

Wealth Managers

Financial Advisors

Other DNFB's*

*Designated Non-Financial Businesses

WHAT IS NEEDED?

An integrated Risk Based Know Your Customer (KYC) and Customer Due Diligence (CDD) Toolkit that offers:

Customer Due Diligence	Risk & Compliance Management	Compliant Customer On-Boarding	Sanction/Watch-List Screening	Politically Exposed Person Screening
Undertake simple, standard and enhanced customer diligence as per risk categorisation.	Dynamically assess overall customer risk and calculate their risk matrices.	Capture all new customer attributes & documentation.	Filter out a true name match and block sanctioned individuals, entities & countries.	Search and identify high risk PEPs, Fraudsters, Criminals and Terrorists.

| Monitoring & Reporting	Alert Management	Case Management	Regulatory + SAR Reporting	MLRO
Monitor customers and generate live graphics in seconds.	Manage the tidal wave of alerts & prioritise them through efficient risk based processes.	Capture comments & documents and seek permissions from senior management.	Generate management and regulatory reports including suspicious activities.	Provides a single data record of all investigations.

OUR SOLUTIONS

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iCompli

iCompli is the secure portal and desktop solution for all iTrackRisk's essential compliance tools. It allows Comsure clients through a secure password protected protocal instant access to their personalised "Deskstop Control Tools", such as iTrackAML and iTrackPEP&Sanctions.

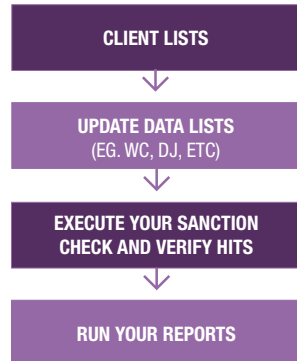| WEB ACCESS |
|:---:|
| ↓ |
| UNIQUE PASSWORD LOGIN |
| ↓ |
| START CLIENT RISK ASSESSMENTS |
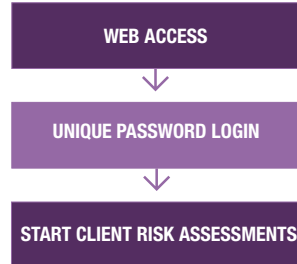
iTrackAML

iTrackAML is a global AML/CTF risk management programe that fits all your needs regarding your AML obligations and enables you to carry out a complete analysis of your AML/CTF risk exposure.

iTrackAML will fulfil your risk mitigation function under operational risk requirements if implemented under the Regulators Risk Based Approach requirements.

IDENTIFICATION
↓
CLASSIFICATION
↓
MONITORING
↓
REPORTING
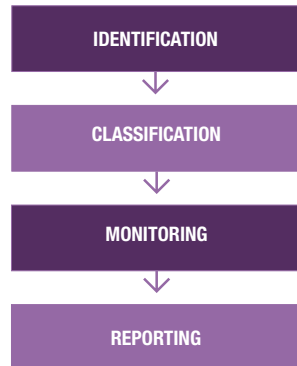
iTrackPEP&Sanctions

Either as a standalone service or integrated with iTrackAML, iTrackPEP&Sanctions enables companies to check automatically and on a regular basis their database against official sanctions, PEP and internal risk lists. This solution allows you to run reports to demonstrate that you have conducted your due diligence with regards to the name-checking requirements.

CLIENT LISTS
↓
UPDATE DATA LISTS (EG. WC, DJ, ETC)
↓
EXECUTE YOUR SANCTION CHECK AND VERIFY HITS
↓
RUN YOUR REPORTS

For more infomation read-on or contact iTrackRisk@comsuregroup.com

i**TRACK**RISK OVERVIEW

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iTrackRisk has been designed to provide a cost-effective, secure, Governance, Risk and Compliance [GRC] solution for small to medium sized businesses [SME's]. This "feature rich" and flexible tool has been used extensively across other disciplines, most recently commissioned (2014) by an agency of the Maltese Government (ID Malta) to assist in their citizenship programme.

The iTrackRisk assessment tools are designed to assist a variety of industries, see examples below:

Financial Services	Investment Managers IFAs Fund Services Trust Company service providers Non – Executive Directors (NEDS)
Designated Non-Financial Businesses [DNFSB]	Lawyers Estate Agents Accountants High Value Dealers Charities
Special Projects & Commissions	Governments (Citizenship Programme) Healthcare Client Annual Reviews Investment Sustainability

iTrackRisk can produce, but is not limited to, the following risk assessments:

AML	Identification + Verification PEP's Internal Reports (SARS) 3rd Party Assessments Profile Information	see page 3-5
Business & Governance	Complaints Breaches Errors Conflicts Client Sustainability	
OTHER	FATCA Assessments Citizenship Bribery (ABC Risk) Tax Product Sustainability	

iTrackRisk Core Benefits:

- ✅ Secure web-based solution
- ✅ Cost effective package
- ✅ Fully scalable and flexible
- ✅ Fully customisable instant risk assessment
- ✅ Risk scores for every risk measure
- ✅ Usable and accessible anywhere in the world
- ✅ Adaptable and instant reporting
- ✅ Enables Boards to set risk strategy and monitor results
- ✅ Board approve iTrackRisk parameters
- ✅ Board can be assured that risks are consistently assessed
- ✅ User friendly
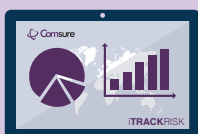
Development Driver
The iTrackRisk cloud based software has been developed in collaboration with I.T. specialists, ensuring its suitability to the market. It is written in PHP and MySQL and can be tailored to meet your specific business requirements, to help you comply not only with your local regulations, but your own policies and procedures. It can be implemented quickly and efficiently.

iTrackRisk Setup
- iTrackRisk can be set up in as little as 24 hours if required
- The package offers instant email support to clients and a transparent pricing schedule for any bespoke add-ons desired eg. sanctions screening (see page 6)
- Once set up there is little need for the expense of programmers
- Users have the capability to amend and adjust most of the parameters themselves
- If any additional functionality is needed this can be commissioned quickly and at a low project cost

Interface with Other Systems
Although iTrackRisk is designed to sit on Comsure's secure client-dedicated server, ('iCompli' see page 7) it can sit on your own server. iTrackRisk's design and flexibility allows it to interface with your existing and future systems.

If your business is required to comply with "Money Laundering Laws and Regulations" you MUST assess the risk of money laundering, including terrorist financing by using what's known as a 'risk-based' approach. In doing so, you MUST decide which areas of your business (Business Risk Assessment [BRA]), clients (Client Risk Assessment [CRA]) and relationships (Relationship Risk Assessment [RRA]) represent a risk and in doing so you MUST put in place prevention and detection measures.

iTrackAML Core Benefits:

- ✓ **Identify** the money laundering risks that are relevant to your business
- ✓ **Carry out** a detailed risk assessment of your business, focusing on customer behaviour, delivery channels and so on
- ✓ **Design** and put in place controls to manage and reduce the impact of the risks
- ✓ **Monitor** the controls and improve efficiency
- ✓ **Keep Records** of what you did and why you did it

Risk Steps on iTrackAML

iTrackAML takes a risk-based approach, to allow you to meet the regulators rules and decide on the most cost-effective way to control the risk of money laundering. This allows you to focus your efforts and resources where the risks are highest.

Risk assessments on iTrackAML

On iTrackAML you can decide for yourself how to carry out your risk assessment and what you record. It might be quite simple or very sophisticated but will be dependent on a number of measurables and what you want to record, but should include as a minimum:

AML Business Risk Considerations

- ✓ The size and structure of your business
- ✓ Corporate governance responsibility & accountability
- ✓ MLCO/MLRO/MLPO processes
- ✓ Internal / External reporting
- ✓ Vetting tools
- ✓ Monitoring and testing
- ✓ Training
- ✓ The range of activities your business carries out & the nature of the products and services it supplies
- ✓ Record keeping and documentation retention

Customer Types & Activites

- PEP'S and other high risk
- Introduced / Intermediary / Obliged persons
- Complicated ownership structures
- Connections to high risk jurisdictions
- Connections to a legal sanction (e.g. UN/EU/OFAC)

Delivery & Interface

- Non face to face
- Introducers / Intermediaries
- Obliged persons
- On-line contact
- Non-regulated relationships

Product Risk

- Anonymous accounts
- Bearer instruments
- Wire transfers
- Correspondent banking

Country Risk

- Sanctions
- Corruption
- Terrorism
- Drugs

Information Technology is needed if you want to remain a viable commercial organisation in the highly regulated and enforced AML environment. However, many SMEs do not have the development budget or a bespoke accounting and client relationship IT system. The solution is iTrackAML, an intuitive and cost-effective derivative of iTrackRisk.

iTrackAML has been tailored specifically for those firms who must carry out Customer Due Diligence (CDD) on a risk sensitive basis. AML Risk calculations are based on many criteria including: client type, client activities, country exposure, product, and delivery.

iTrackAML Capabilities:

- Identification records can be uploaded and saved
- Links onto other client data housing systems to allow downloading of data rather than double-digit entry
- Risk assessments can be made of associated legal structures underpinning the client relationship
- Risk ratings for individuals can be analysed across complex structures

- Risk assessments, such as 'Bribery Risks', can be created
- Links to your own AML policies & procedures
- Offers an on-line secure reporting (MLRO) system
- Delivers extensive tailored dashboard reporting
- Maintenance of a master country risk list
- Can be linked to sanctions and other high risk data

iTrackAML Map of Benefits
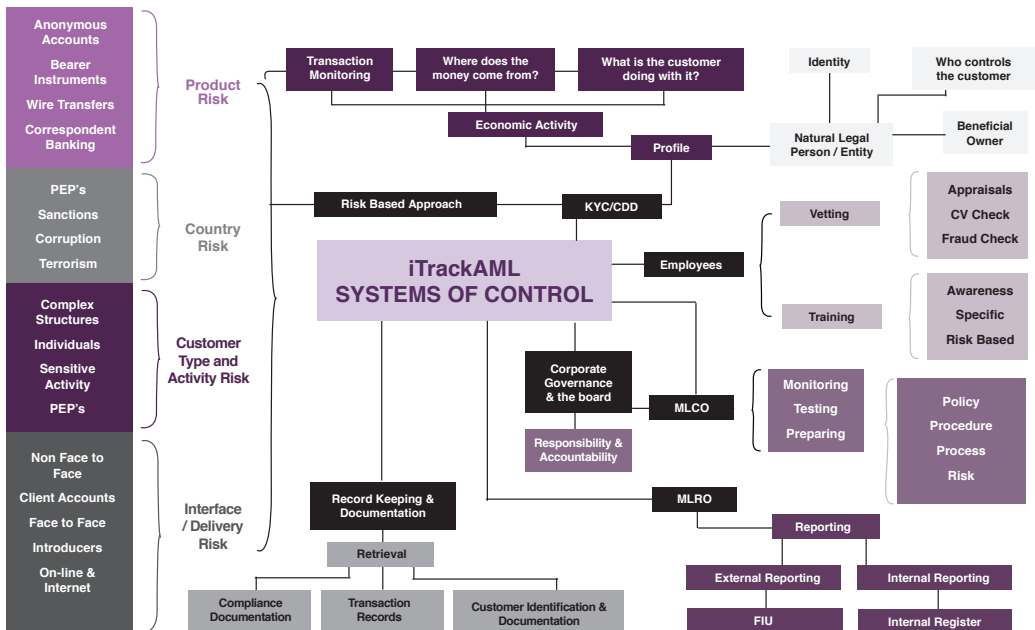
Regulatory

- Retain historic client risk profiles, including when they were changed and by whom
- Easily set up new criteria or change the weighting of existing ones
- Identify clients moving from one risk category to another
- Take advantage of reduced CDD and monitoring requirements for those clients falling below a specified benchmark
- Provide an instant risk overview of the whole client base
- A multi user function for risk scoring
- An extensive report listing all clients with a risk of over ... (you decide)
- Power of Attorney, PEP'S and other registers

Record Keeping

- Hyperlinks take you straight to key meeting notes or correspondence
- Information gaps are highlighted
- Automatic archiving and instant retrieval of historic data
- Functionality for scanned verification documents to be stored
- Ability to save risk scores in PDF either online or on your own systems
- Easy segmentation of data
- Identifies which clients are resident in a particular country
- Constant affirmation among staff of a firm's risk criteria

Reporting

- Provides an instant risk overview of the whole client base
- Focuses on qualitative information that is drawn from the quantitative iTrackAML information depositary
- Integrates information on risk with other disclosures
- Allows users to think beyond normal (e.g. annual/quarterly) reporting cycles
- Keeps lists of principal risks short and precise
- Has the flexibility to report whatever risk on any measures
- Offers variable coloured graphical representation of risk through pie or bar graphs
- Easily accessible enabling you to create and save graphs wherever you are in the world
- Provides a comprehensive history with all risk reports saved and accessible for as long as required

Corporate Governance

- Reassurance for Board members
- The board can approve the risk parameters that go into iTrackAML
- Backs up the business risk assessment
- Highlights current concerns in real time
- Allows users to review risk experiences
- Board members are assured that client risks will be consistently assessed, regardless of who in the business performs the review
- Politically Exposed Person (PEP) and other Enhanced Due Diligence (EDD) registers instantly available
- A number of summary reports are available ranging from a graphical representation of overall risk, to the business risks or an individual client's risk history
- Ability to make unified changes to historic client risk scores eg a country goes from low to high (or vice versa)

iTRACKPEP&SANCTIONS

iTrackPEP&Sanctions is an effective system that enables financial institutions to screen clients, both individuals and companies, (either singularly or through a batch process) against International Financial Sanctions lists, PEP lists and other risk data.

Easy to use, iTrackPEP&Sanctions also provides an audit trail to help demonstrate compliance. iTrackPEP&Sanctions can be used as an integrated tool within iTrackAML or as a stand-alone sanction data facility.

iTrackPEP&Sanctions Core Benefits:

- ✅ **Accurate** – Minimise false positives through the intelligent fuzzy search
- ✅ **Quick –** Massively reduce time spent screening targets
- ✅ **Simple –** Easy to learn and adopt without complex configuration options
- ✅ **Cost Effective –** Greater control and transparency with usage-based pricing
- ✅ **Data Protection –** Your client information is securely stored

Data Sources Include:

- UK/UN/EU/US OFAC sanction lists
- World-Check
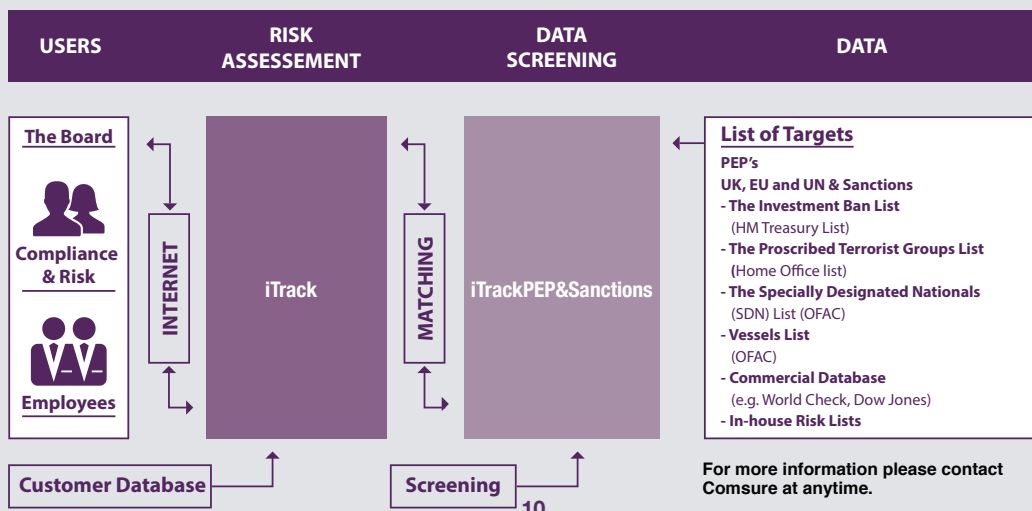- Dow Jones
- In-house risk lists

iTrackPEP&Sanctions Features:

- Ability to run ad-hoc or batch searches against the key UK/UN/EU/US lists
- Intelligent 'fuzzy searching'
- Management of 'false positives'
- Reports created for every search
- Facility to integrate within an existing system
- A transparent pricing model based on usage
- Online and accessible anywhere

A visual summary of iTrackRisk at work:

In summary iTrackRisk follows the following path:

USERS	RISK ASSESSEMENT	DATA SCREENING	DATA

The Board

Compliance & Risk

Employees

INTERNET

iTrack

MATCHING

iTrackPEP&Sanctions

List of Targets
PEP's
UK, EU and UN & Sanctions
- **The Investment Ban List**
  (HM Treasury List)
- **The Proscribed Terrorist Groups List**
  (Home Office list)
- **The Specially Designated Nationals**
  (SDN) List (OFAC)
- **Vessels List**
  (OFAC)
- **Commercial Database**
  (e.g. World Check, Dow Jones)
- **In-house Risk Lists**

Customer Database

Screening

For more information please contact Comsure at anytime.

i**COMPLI** DESKTOP

iCompli is the secure portal for all iTrackRisk's essential compliance tools and a secure desktop solution. It allows Comsure clients instant access to their personalised Deskstop control tools, such as iTrackAML and iTrackPEP&Sanctions.

iCompli helps clients follow regulatory compliance and corporate governance best practice. The pioneering Desktop platform is used as an integral part of a consistent and auditable AML and anti-corruption compliance programme.

Through a simple and intuitive system iCompli offers the following:

- A totally flexible solution;
- Internal adaptability;
- Access to external bespoke support;
- Low customisable fees;
- Option to pick and choose tools that are relevant to your business;
- Accessibility from anywhere in the world;
- Security;
- Full reporting functionality;
- Multi-user function and;
- Flexible hosting options.

i**COMPLI** SECURITY

Every customer is hosted on a separate virtual machine in an isolated sandbox that ensures total data segregation. This virtual machine is further protected by a firewall and traffic analysis system that examines data traffic and helps prevent suspected hack attempts.

iCompli is protected by a 2048 bit RSA SSL Secure Certificate ensuring that all data sent and received by iCompli is protected to the highest possible level. Furthermore the virtual machine can be locked down to a specific range of IP addresses ensuring that only particular machines can access the system.

Hosting is delivered by an accredited PCI DSS Level One Service Provider - the most thorough level of accreditation for 'Data Centres'. This ensures security controls are satisfactory to meet the needs of PCI-compliant hosting. This accreditation is audited on an annual basis.

Alongside the PCI accreditation, the hosting provider is also fully ISO27001:2005 compliant ensuring confidential customer data is handled through robustly managed processes.

Further information can be supplied on application.

ABOUT Comsure™

Comsure is a privately owned company working with a global client base from its operational base in Jersey, Channel Islands. Comsure provides comprehensive risk advisory services to help organisations and governments address regulatory and legal issues. Comsure's core areas are Compliance, HR, Training, Technology, Government Services and Due Diligence.

For more information please visit or email:
www.comsuregroup.com I iTrackRisk@comsuregroup.com I info@comsuregroup.com