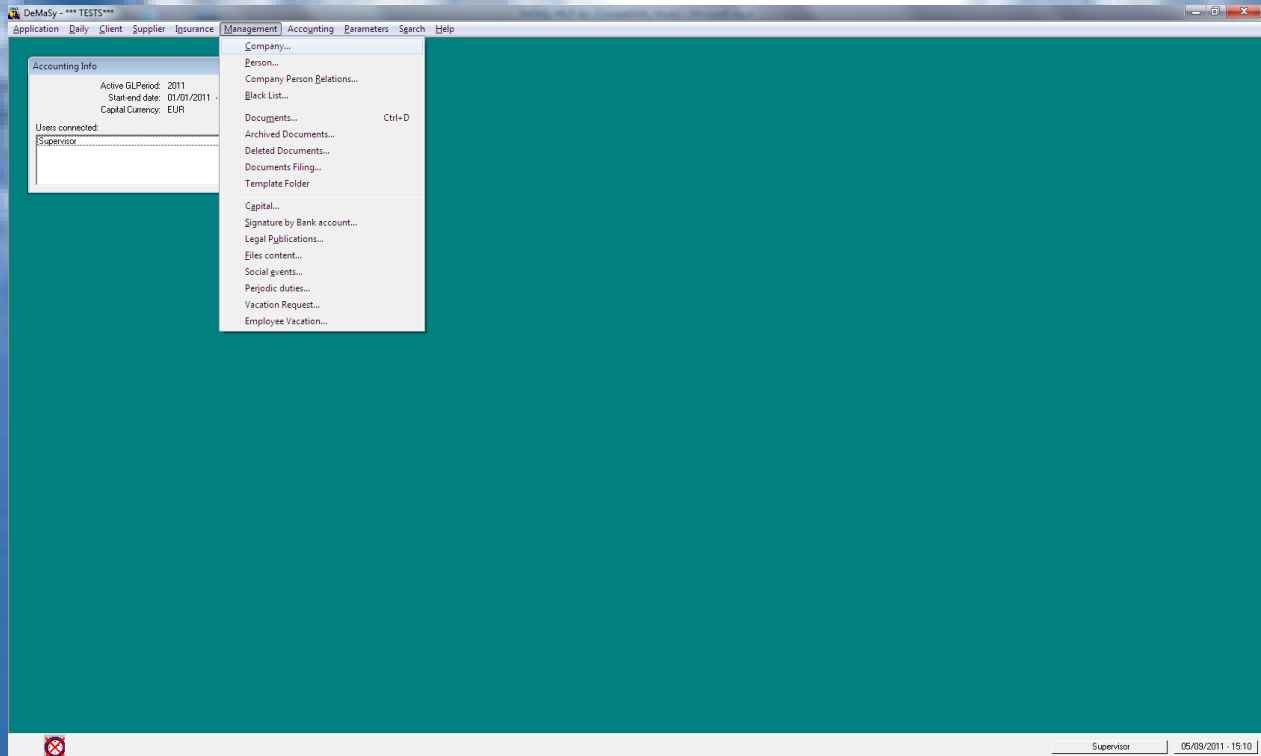




DeMaSy ERP software

MODULE COMPLIANCE (file content / balcklist / KYC)



Compliance is module gathering functionalities of other modules:

- Company / person details
- Electronic document management
- File content
- Relations

The following functionalities are specifically assigned to the compliance module

- Blacklist
- KYC + client risk scoring
- Client approval
- STR (suspicious transaction reviews)

DeMaSy compliance starts with the company/person details and relation module:

5 tabs of information allow storing all companies/persons details.

Among other KYC information can be recorded in the database.

Questions list are customizable and each question can have a score assigned.

Different functionalities in DMS are implied in compliance work:

- Company/person detail
- File content
- Document Management System
- KYC
- CRM - Relations
- Blacklist
- Reporting



COMPANY / PERSON DETAILS

Company - (Show mode)

Main | Business | Fiscal/social information | Shareholding | Memo

Company / Office: ...

Type / Category: Nbr: 754

Tax / IBC / File Number:

Phones and Faxes

	Phone Type	Phone Number	Comment
GSM (2)		00352 621 363 126	ROMAIN
GSM (Portable)		661 220 499	Maria / Interlocuteur Compta (All/Tarçages)

Addresses

Recipient	Type	N°	Street	Code	Locality	Building	Country	Region	Comment
COURRIER		25	route de Luxembourg	L-3253	Beltenbourg		Luxembourg		
COURRIER 3		7A	Allée du Carmel	L-1354	Luxembourg		Luxembourg		
DOMICILE LEGAL		25	route de Luxembourg	L-3253	Beltenbourg		Luxembourg		

E-Mail

	Type	Logical name	E-Mail address	Comment
Professionnelle 1		IAMCO S.A.	zak.ia@twinetwork.lu	Katalin Szocs et Maria 661 220 499
Professionnelle 2		IAMCO S.A.	romaincseiler@yahoo.com	

Buttons: Add, Edit, Delete, Cancel, Relations..., Documents..., Bank account..., Capital..., Authorized capital..., Files content..., Publications..., Periodic duties..., Calendar list..., Import..., Transfer..., BlackList (100%), Rights..., Exit

FILE CONTENT

File content allows the users to predefine file name and standard required content.

Based on the predefined templates the application allows to document what supporting documents have been filed:

FILE NAME	Name of the standard file applicable to the client
FILE CONTENT	File content corresponds to the different items to be filed
FILED	If the checkbox is ticked this means that the document has been properly filed
DATE	Date of filing
COMMENT	Any relevant free comment
DOCUMENT FILE NAME	Document number of the associated documents store in the document module
DOCUMENT NAME	Name of the associated documents store in the document module

Based on these data user will be able to print a report and follow up on all exceptions



Files content by Company / Person - (Show mode)

Company/Person: 2502 S.A. [Icons] Refresh

File: [Icon]

File content: [Icon]

Filed: [All] [Icon]

File name	Files content	Filed	Date	Comment	Document file name	Document name
DOSSIER COMPLIANCE	Convention de domiciliation	N/A				
DOSSIER COMPLIANCE	Convention de mandat (administrateur ou gérant)	N/A				
DOSSIER COMPLIANCE	Copie carte d'identité/passeport des administrateurs	N/A				
DOSSIER COMPLIANCE	Copie carte d'identité/passeport du bénéficiaire économique	Yes		VALIDITE : 2017	00049390	P.J. F. BECKIUS
DOSSIER COMPLIANCE	FORMULAIRE : déclaration Bénéficiaire économique	Yes	20/10/2010		00049391	DECLARATION B.E. SIGNED
DOSSIER COMPLIANCE	Identification du client (KYC)	Incomplete		en attente retour chl		
DOSSIER COMPLIANCE	LETTRE de Mission	Yes	20/10/2010		00052600	LETTRE DE MISSION SIGNED

[Add] [Edit] [Delete] [Cancel] [Add all] [View Doc] [Exit]

By clicking on view document user will be able to retrieve the scanned document.

00049391.pdf - Adobe Reader

Profession :

Adresse complète : 419, Rue de l'Autephe
ST METZ

N° de passeport / carte nationale d'identité : 0705579 00864.

dont les caractéristiques sont reprises ci-après :

Dénomination ou raison sociale :	2502 S.A.
Forme sociale :	Société Anonyme de droit luxembourgeois
Nationalité:	Luxembourgeois
Date de constitution et lieu d'enregistrement:	13.11.2007
N° de registre de commerce :	B 133613
Adresse du siège social :	

Je joins/nous joignons à la présente une copie certifiée conforme de la/des pièce(s) d'identité susmentionnée(s).

Je déclare / nous déclarons également que :

- les fonds détenus directement ou indirectement par la Société n'ont aucun lien avec le financement du terrorisme ni avec les incriminations suivantes : les organisations criminelles, l'enlèvement ou la



DOCUMENT MANAGEMENT SYSTEM :

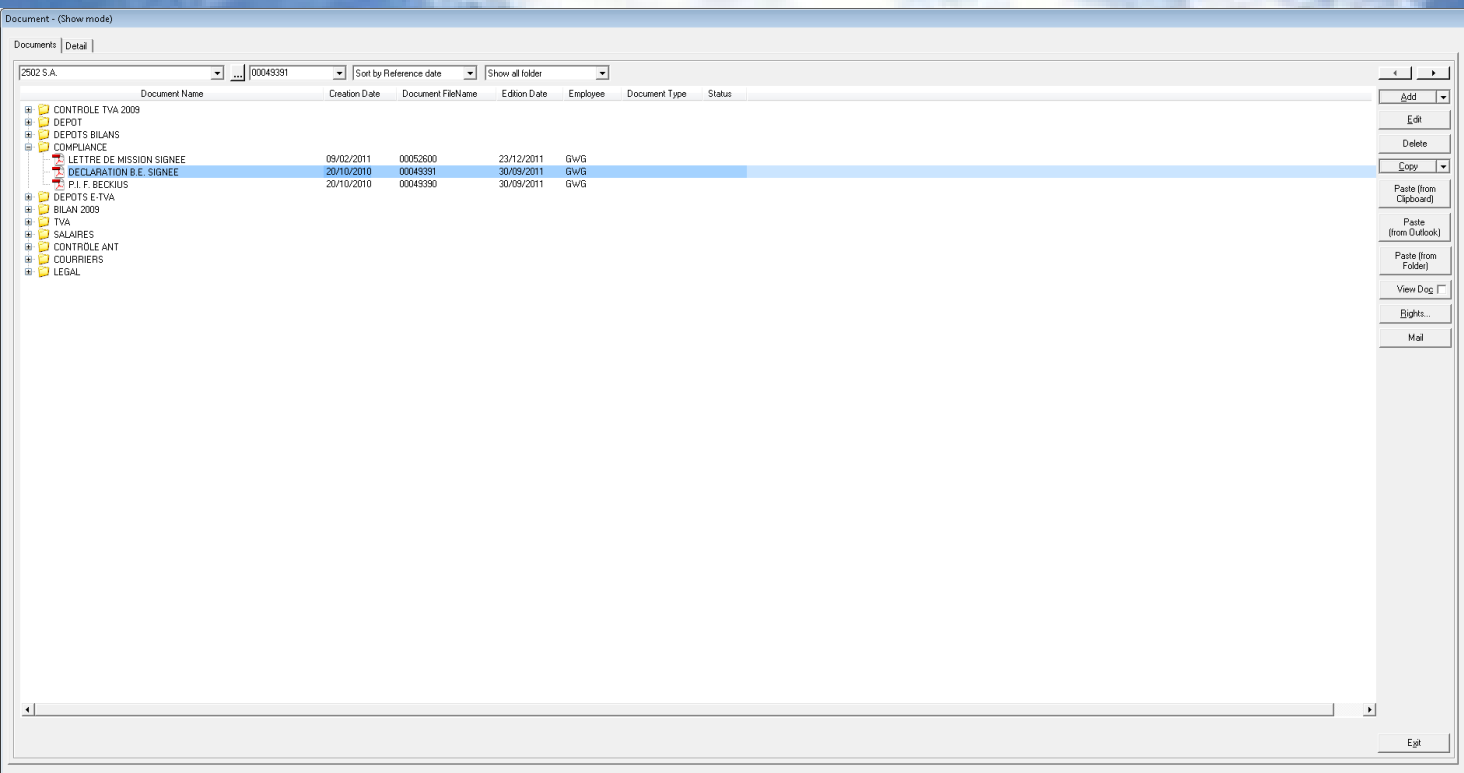
The document module allows storing all kind of document (native format) in connection with the clients, companies, persons in the database.

Example: Word – Excel – PDF – eMail ...

All documents are fully secured by a rights management by group or by user.

NB: if a user is not authorized to view a document it will not even be listed in the folder directory

The document module offers advanced and easy feature to transfer document from email to documents or from document to email.



[KYC:](#)

KYC TAB on Company / Person

On the KYC tab user select a group of questions and all the standard questions are attached to the company/person allowing the user to give and save the appropriate answers.

Company - (Show mode)

Main | Business | Tax/social information | Shareholding | Memo | **KYC**

Nationality: Luxembourgish
Jurisdiction country: Luxembourg
Activity: Software
Source of wealth: test

Last ongoing cash transaction monitoring: 31/12/2011
Last periodic review / monitoring: 31/12/2011

Group: KYC

1. Cash Intensive business

Type	Weight	Description	Message
<input checked="" type="checkbox"/> Yes	10		
<input type="checkbox"/> No	0		Additional due diligence: ...

2. Is this a PEP

Type	Weight	Description	Message
<input checked="" type="checkbox"/> Yes	5		
<input type="checkbox"/> No	0		

3. Number of transactions a year

Type	Weight	Description	Message
<input checked="" type="checkbox"/> < 100	0		
<input type="checkbox"/> > 100 < 1000	1		
<input type="checkbox"/> > 1000 < 5000	5		
<input type="checkbox"/> > 5000 < 10000	8		
<input type="checkbox"/> > 10000	10		

4. First relation

Type	Weight	Description	Message
<input checked="" type="checkbox"/> Face to Face	0		
<input checked="" type="checkbox"/> Internet	10		A specific form has to be filled in and sent to the MLRO
<input type="checkbox"/> Phone	5		
<input type="checkbox"/> Intermediary	1		
<input type="checkbox"/> Other	10		

5. Origin of funds

Type	Weight	Description	Message
<input checked="" type="checkbox"/> Bank	0		
<input type="checkbox"/> Check	0		
<input type="checkbox"/> Cash	0		
<input type="checkbox"/> Asset	0		
<input type="checkbox"/> Other	0		

Buttons: Add, Edit, Delete, Cancel, Relations..., Documents..., Bank account..., Capital..., Authorized capital..., Files content..., Publications - Mail..., Periodic duties..., Calendar list..., Import..., Transfer..., **BlackList**, Rights..., Exit

**PARAMETERS : Mangement**

KYC Group : Use to define the group of questions (ex : by jurisdiction)

KYC Group

Name:

Add
Edit
Delete
Cancel
Exit

KYC Questions : Screen used

- to add the different questions
- give a weight to each question which will be used to calculate a scoring for determining the risk value of the client (report id 1517)
- Add additional information to be prompted to the user in case the answer is selected (ex: additionnal due diligence)

NB: In order to select the order of the question user has to start the question by a number.

KYC Questions - (Show mode)

Question Types

Question type:

2. Is this a PEP
3. Number of transactions a year
4. First relation
5. Origin of funds
6. Source of funds

KYC question group:

Add Edit Delete Cancel

Questions:

Name	Weight	Message
Yes	10	Additional due diligence: ...
No	0	

Add Edit Delete Cancel

Exit



CLIENT

Client Data - (Show mode)

Client list | Company / Person |
Main | Client detail | Approval |

☐ Prospect
Start-end date: 23/10/1996
Risk Value: 0

File number: 1 File holder: D05
Division:
Credit limit: 0

Currency: EUR Reminder maturity: 30 ☒ End-of-month
Default G/L account: 7200 Vente de logiciels
Default VAT rate: V-15
Type:
Default Bank Account:

Business provider:
Source:
Status:
Domiciliation agent:

Premium invoicing:
☐ By company
☐ By agent to client
☐ By agent to sub-agent

Billing of Received commission:
☐ Deducted from premium company invoice
☐ Invoiced to company

Billing of Given commission:
☐ Deducted from premium sub-ag invoice
☐ Paid to sub-agent

Detail
Edit
Cancel
Receivables...
Job
Relations...
Services...
Documents...
Reminder...
Print
Client STR
Exit

CLIENT RISK VALUE

Each client can be given a risk value allowing categorizing client in accordance with a risk predefined and customized scoring in the KYC.

Client Data - (Edit mode)

Client list | Company / Person |
Main | Client detail | Approval |

☐ Prospect
Start-end date: 23/10/1996
Risk Value: 2

File number: 1 File holder: D05
Division:
Credit limit: 0

Currency: EUR Reminder maturity: 30 ☒ End-of-month
Default G/L account: 7200 Vente de logiciels
Default VAT rate: V-15
Type:
Default Bank Account:

Business provider:
Source:
Status:
Domiciliation agent:

Premium invoicing:
☐ By company
☐ By agent to client
☐ By agent to sub-agent

Billing of Received commission:
☐ Deducted from premium company invoice
☐ Invoiced to company

Billing of Given commission:
☐ Deducted from premium sub-ag invoice
☐ Paid to sub-agent

Detail
Edit
Cancel
Receivables...
Job
Relations...
Services...
Documents...
Reminder...
Print
Client STR
Exit



TAB APPROVAL

Allows to record the responsible person(s) (or committee) responsible for client approval and the date of approval

Client Data - (Show mode)

Client list | Company / Person |
Main | Client detail | Approval |

Date	User
01/01/1994	Luciano Pires
01/01/1994	Todoaro Angelo

Add
Edit
Delete
Cancel

Detail
Edit
Cancel
Receivables...
Job
Relations...
Services...
Documents...
Reminders...
Print
Client STR
Exit

**BUTTON CLIENT STR (suspicious transaction review)**

Allows the users recording and documenting a suspicious transaction identified in relation with a client. Send from outlook and reminder are used to send a mail or set a reminder to the appropriate MLRO or responsible person with the content of the suspicious transaction.

Client STR - (Edit mode)

User	Date	Description
Supervisor	01/01/2010	Transfer of funds from a branch without bona fide support

Date: 15/02/2012 ...

Description: HSBC Bank account MT00 1234 5678 9000
Transfer of funds from a branch without bona fide support

Buttons: Add, Edit, Delete, Cancel, Send From Outlook, Reminder, Exit




CRM - RELATIONS:

Relation module allows tracing all type of relations (beneficial owners, Directors, ...)

This module allows to fully securing confidential data by user, group of users, company, persons and even relation type.

Company and Person Relations - (Show mode)

Company / Person:  Refresh

Category:

Start-end date: Search Active Relation Start and End Date

Relation type:

Sort by:

Relations Detail

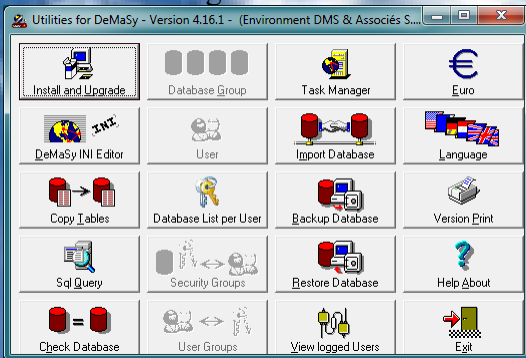
Company / Person	Relation type	Start date	Diff	End date	Diff	Signature	Shares	Type of shares	Comment	Work extension
DMS & Associés	Commissaire aux comptes	03/06/2010	100							
Seller Romain	Bénéficiaire économique									
Seller Romain	est administrateur de	03/06/2010	100							

Client...
Supplier...
Add
Edit
Delete
Cancel
Bank accounts...
Reminder...
Documents...
Capital...
Files content...
Exit

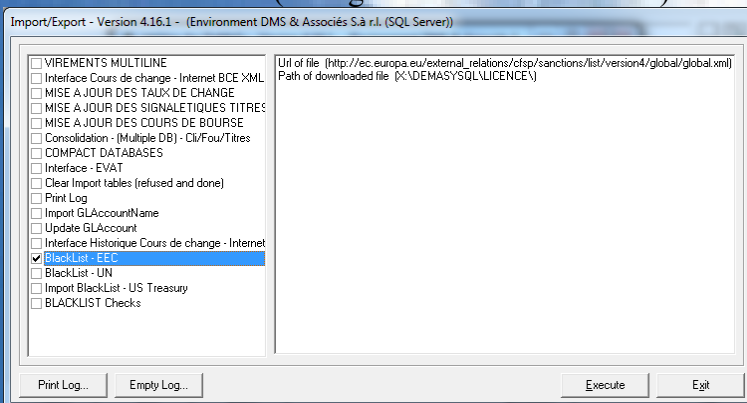


BLACKLIST

Blacklist is designed to allow users to scan their databases with information of the sanctions lists.



BOUTON IMPORT (listing all available interfaces)



BlackList EEC (European community)

BlackList UN (United Nations)

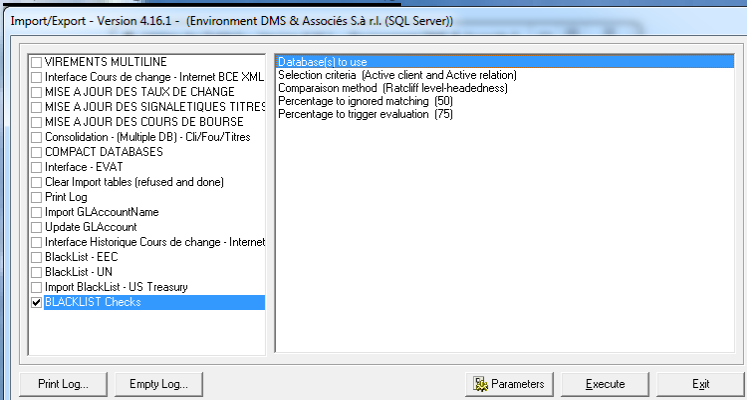
BlackList US TREASURY (US Treasury)

These three lists are free list published on the internet.

For clients adequately registered by World-Check, there is also a interface (black list and PEP).

URL OF FILE	Internet address where the file can be downloaded
PATH OF DOWNLOADED FILE	Directory path in which the file will be downloaded and saved

INTEFACE PARAMETERS



This feature starts the checks with the selected databases



Ratcliff/Obershelp pattern recognition

The Ratcliff algorithm computes the similarity of two strings as the doubled number of matching characters divided by the total number of characters in the two strings. Matching characters are those in the longest common subsequence plus, recursively, matching characters in the unmatched region on either side of the longest common subsequence.

Examples

The similarity of ALEXANDRE and ALEKSANDER is $2 * (3+3+1+1) / (9+10) = 84\%$ (matching ALE, AND, E, R).

Ratcliff headedness

This is a variant of the original Ratcliff algorithm done to give a weight to the contiguous text sequence packages identified. The more contiguous letters in the two text string compared the to reduce the match percentage based on a ponderation of the continued text sequence

ALEXANDRE in DMS (9 letters)

ALEKSANDER in the blacklist (10 letters)

ALE pos 123 in DeMaSy and pos 123 in Blacklist $\Rightarrow 3-3 = 0 \Rightarrow [100 - (0/9 * 100)] = 100\%$

AND pos 567 in DeMaSy and pos 678 in Blacklist $\Rightarrow 7-8 = \text{Abs}(-1) \Rightarrow [100 - (1/9 * 100)] = 55,55\%$

E pos 9 in DeMaSy et pos 9 in Blacklist $\Rightarrow 9-9 = 0 \Rightarrow [100 - (0/9 * 100)] = 100\%$

R pos 8 in DeMaSy et pos 10 in Blacklist $\Rightarrow 8-10 = \text{Abs}(-2) \Rightarrow [100 - (2/9 * 100)] = 77,77\%$

WEIGHT

$2 * (3 * 100\% + 3 * 55,55\% + 1 * 100\% + 1 * 77,77\%) / (9+10) =$

$2 * (4,88) / (9+10) = 51,36\%$ instead of 84%

Blacklist interface results

The screenshot shows the 'Blacklist' application window. It has two tabs: 'Global result' and 'Detail'. The 'Global result' tab is active, displaying a summary table and a detailed table.

	In database	Evaluated
Number of companies:	1861	586
Number of persons:	1387	658
Total	3248	1244

Percentage	Companies	Persons
91-100	1	0
81-90	2	0
71-80	32	1
61-70	112	5
51-60	255	8
41-50	36	0
31-40	0	0
21-30	0	0
11-20	0	0
1-10	0	0
0-0	148	644
All	586	658

Company/Person: All Status: All

Company/Person	Type	% max	Interface type	Status	User
IAMCO S.A.	Company	100 %	US Department of Treasury	Pending	

Comment:

See Reset Exit

The status given to all matched items is PENDING.

The authorized user can confirm the acceptance of the relation by double clicking on the record after the review of all the matched items on the detail tab. The status becomes either ACCEPTED or REFUSED.

The acknowledging user and the date/time of the action is traced by the application database.



DETAIL TAB

BlackList [Detail]

Alias:

InterfaceType	Alias	Percentage
US Department of Treasury	IAMCO	100%
US Department of Treasury	IAMI	67%
US Department of Treasury	RASCO	60%
US Department of Treasury	TAJCO	60%
US Department of Treasury	Kimo	58%
US Department of Treasury	DIAMOND	57%
US Department of Treasury	IMCOMER	57%
US Department of Treasury	AGOCO	56%
US Department of Treasury	CIDCO	56%
US Department of Treasury	FLACO	56%
US Department of Treasury	PACHO	56%
US Department of Treasury	SISCO	56%
US Department of Treasury	ZISCO	56%
US Department of Treasury	ALCO	53%
US Department of Treasury	AMNO	53%
US Department of Treasury	APCO	53%
US Department of Treasury	BICO	53%
US Department of Treasury	NICO	53%
US Department of Treasury	ADMACOOP	52%
US Department of Treasury	AMNO	52%

- <BlackList>

<uid xmlns="http://tempuri.org/sdnList.xsd">11195</uid>

<lastName xmlns="http://tempuri.org/sdnList.xsd">IRAN AIRCRAFT MANUFACTURING INDUSTRIAL COMPANY</lastName>

<sdnType xmlns="http://tempuri.org/sdnList.xsd">Entity</sdnType>

- <programList xmlns="http://tempuri.org/sdnList.xsd">

<program>NPWMD</program>

</programList>

- <akaList xmlns="http://tempuri.org/sdnList.xsd">

- <aka>

<uid>11601</uid>

<type>a.k.a.</type>

<category>weak</category>

<lastName>HEVAPEIMASAZI</lastName>

</aka>

- <aka>

<uid>11600</uid>

<type>a.k.a.</type>

<category>weak</category>

<lastName>HAVAPEYMA SAZHRAN</lastName>

</aka>

- <aka>

See Reset Exit

The detail tab list all matches percentage with all source files and store the XML data of the source files. Each time the interface is launched based on updates of source files, all existing records will be scanned and updated if necessary. Only information with higher risk will result in an update of the existing records. All unmatched items are flagged as reviewed as well and any next match would update these records.



SCAN ON A BY CONTACT BASIS

When adding a new company/person the user will be allowed to scan real time based on the existing source file on the server.

A **BLACKLIST** button exists on the company/person screen.

This button is flashing when no scan has been done yet.

If the user click the button the scan is initiated and the results are displayed real time.

Company - (Show mode)

Main | Business | Fiscal/social information | Shareholding | Memo

Company / Office: ...

Type / Category: COMMERCIALE

Tax / IBC / File Number:

Phones and Faxes

Phone Type	Phone Number	Comment
Fax	26 11 99 64	
Telephone N° 1	26 11 99 63	

Addresses

Recipient	Type	N°	Street	Code	Locality	Building	Country	Region	Comment
	COURRIER	65	rue des Romains	L-6041	Strassen		Luxembourg		

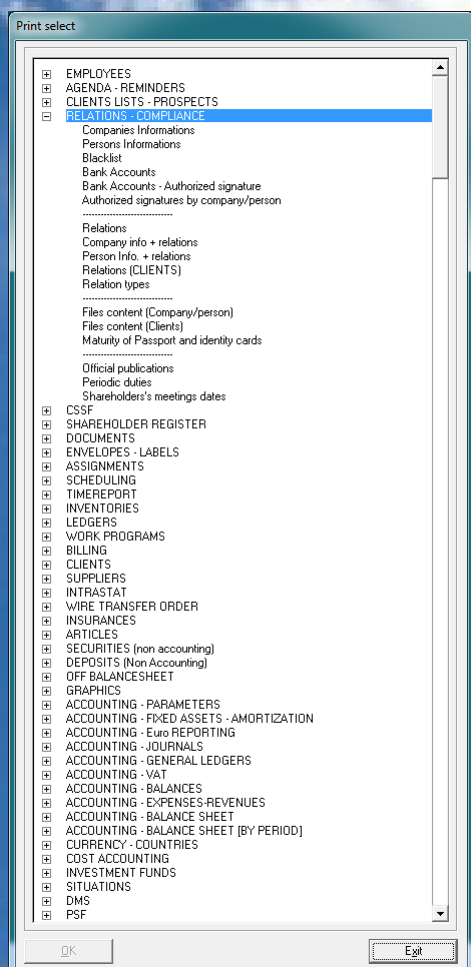
E-Mail

Buttons: Add, Edit, Delete, Cancel, Relations..., Documents..., Bank account..., Capital..., Authorized capital..., Files content..., Publications..., Periodic duties..., Calendar list..., Import..., Transfer..., BlackList, Rights..., Exit



REPORTING:

Based on all the informations store in the database (company/person/relation/File content) specific reports have been designed to allow following up and monitoring the risks.



Company Information	Lists all company details
Person Information	Lists all person details
Blacklist	Status of blacklist checks
Bank Accounts	Bank account listing
Bank Accounts + authorized signatures	List for all companies their bank accounts and the authorized signatures
Authorized signatures by company/persons	List all persons with all the companies in which they have authorized signatures on bank accounts



Relations	Lists all the relations of a companies and persons
Company info + relations	This report gives a COMPLETE report for companies: <ul style="list-style-type: none">- ALL details of the company- Capital register information- All Relations- All Bank accounts- All Services- All Publications
Persons info + relations	This report gives a COMPLETE report for persons: <ul style="list-style-type: none">- ALL details of the company- All Relations- All bank accounts All Publications
Relations (clients)	This reports list all relations of the clients
Relation types	List all the relation types managed in the application

File content (company/person)	List all the files defined for companies and persons and the status of their content. It provides the user with all the exceptions to be dealt with
File content clients	Same report than previous one but with a selection on the client
Maturity of passport and identity cards	List all passports and identity cards matured

Official publications	Lists all the officials publications for a company
Periodic duties	Lists all periodic duties as defined by company and person for status follow up
Shareholders meeting dates	Lists all shareholders meeting dates



DeMaSy – COMPLIANCE overview

Compliance is everywhere in DeMaSy and DeMaSy is all about compliance

DeMaSy compliance starts with the company/person details and relation module:

5 tabs of information allow storing all companies/persons details.

Among other KYC information can be recorded in the database.

Questions list are customizable and each question can have a score assigned.

Different functionalities in DMS are implied in compliance work:

- Company/person detail
- KYC
- CRM – Relations
- File content
- eDocument Management System
- Blacklist
- Reporting

COMPANY / PERSON DETAILS

(DeMo 2016) ABACAB - Company - (Show mode)

Main	Legal	Compliance	VAT	Tax	Annual accounts	Other	Memo	KYC	Shareholding
Company / Office: A&T Equity S à r.l. ...									
Type / Category: S à r.l. COMMERCIALE Nbr. 48									
Tax / INTRACOM VAT number / File Number: 0102439822 LU123456789									
Number / RC Number: 0 B156756									

Phones and Faxes

Phone type	Phone number	Comment
Mobile 1	0034 609 027 051	

Addresses

Recipient	Type	Building	N°	Street	Code	Locality	Country	Region	Comment
	COURRIER	1		route d'arlon	L-1234	Luxembourg	Luxembourg		
	DOMICILE LEGAL	43		Boulevard du Prince Henri	L-1724	LUXEMBOURG	Luxembourg		

E-Mail

Type	E-Mail address	Comment
PROFESSIONNELLE	A&T Equity S à r.l. AT@edna.lu	

KYC:

KYC TAB on Company / Person



On the KYC tab user select a group of questions and all the standard questions are attached to the company/person allowing the user to give and save the appropriate answers.

(DeMo 2016) ABACAB - Company - (Edit mode)

Main Legal Compliance VAT Tax Annual accounts Other Memo **KYC** Shareholding

Company: A&T Equity S à r.l.

Nationality: Luxembourg

Jurisdiction country: Luxembourg

Activity: Holding

Source of wealth:

Monitoring frequency: (None)

Last periodic review / monitoring: / / ...

Group: KYC

Type	Weight	Description	Message
<input type="checkbox"/> Yes	10		
<input checked="" type="checkbox"/> No	0		

2. First relation

Type	Weight	Description	Message
<input checked="" type="checkbox"/> Face to Face	0		
<input type="checkbox"/> Internet	10		
<input type="checkbox"/> Phone	8		
<input type="checkbox"/> Intermediary	5		
<input type="checkbox"/> Other	10		

3. Is this a PEP?

Type	Weight	Description	Message
<input type="checkbox"/> Yes	10		
<input checked="" type="checkbox"/> No	0		

4. Number of transactions a year

Type	Weight	Description	Message
<input type="checkbox"/> <100	2		
<input type="checkbox"/> >100 <1000	4		
<input checked="" type="checkbox"/> >1000 <5000	6		
<input type="checkbox"/> >5000 <10000	8		
<input type="checkbox"/> >10000	10		

5. Origin of funds

Type	Weight	Description	Message
<input checked="" type="checkbox"/> Personal	n		

Description will contain the answer of the user filling in the KYC answers

Message consist of warning text that will be prompted to any user filling in the KYC answers

**PARAMETERS : Mangement****KYC Questions :**

- Allows to add any question
- Allows to give a weight to each question which will be used to calculate a scoring for determining the risk value of the client (report id 1517)
- Allows to add additional information to be prompted to the user in case the answer is selected (ex: additionnal due diligence)

(DeMo 2016) ABACAB - KYC Questions and Answers - (Show mode)

Question Name

Question Name: 1. Cash Intensive business
1. Cash Intensive business
2. First relation
3. Is this a PEP?
4. Number of transactions a year
5. Origin of funds
6. Source of funds

KYC Group: KYC

Add

Edit

Delete

Cancel

Answers

Answers	Weight
Yes	10
No	0

Add

Edit

Delete

Cancel



CLIENT RISK VALUE

Each client can be given a risk value allowing categorizing client in accordance with a risk predefined and customized scoring calculated by the KYC.

(DeMo 2016) ABACAB - Client Data - (Edit mode)

Client list Client detail Client approval Add client from Company / Person

Start-end date: 15/10/2010 ... / / ... ☐ Prospect
Risk Value: 2

File number: 48 File holder: THD
Division: Domiciliation
Allow credit sales:
Credit limit: 0

Currency: EUR Reminder maturity: 60 ☒ End-of-month
Print reminder: Default

Default account: 7062, Net amount of the turnover - Supplies of services
Default VAT rate: V-15
Type: DOMICILIATION [ITPS]
Category:
Default Bank Account: 30-704625-51

Business provider: ITPS (Luxembourg) S.A.
Source:
Status:
Domiciliation agent:
Invoice remark:
warning when invoicing

Premium invoicing:
☐ By company
☐ By agent to client
☐ By agent to sub-agent
Billing of Received commission:
☐ Deducted from premium company invoice
☐ Invoiced to company
Billing of Given commission:
☐ Deducted from premium sub-ag invoice
☐ Payed to sub-agent

TAB APPROVAL

Allows to record the responsible person(s) (or committee) responsible for client approval and the date of approval

(DeMo 2016) ABACAB - Client Data - (Show mode)

Client list Client detail Client approval Add client from Company / Person

Date	User
05/01/2017	Drot Thierry
15/01/2017	Dory Dominique

Add
Edit
Delete
Cancel

**BUTTON CLIENT STR (suspicious transaction review)**

Allows the users reconrding and documenting a suspicious transaction identified in relation with a client. Send mail and reminder are used to **send a mail or set a reminder to the appropriate MLRO** or responsible person with the content of the suspicious transaction.

Document icon allows as everywhere in DeMaSy to attach all the supporting documents

(DeMo 2016) ABACAB - Client STR - (Show mode)

AT Equity S.à r.l.

User	Date	Description
Drot Thieny	24/09/2017	Transfer of funds 500K from a branch without bona fide evidence

Date: 24/09/2017 ...

Description: Transfer of funds 500K from a branch without bona fide evidence

Follow up: Conversation with HSBC personnel (bank account MT00 1234 5678 9000)
Intercompany loan - contract received

Buttons: Add, Edit, Delete, Cancel, Send Mail, Reminder, Document, Exit



FILE CONTENT

File content allows the users to predefine file name and standard required content.

Based on the user templates the application allows to document what supporting documents have been filed:

FILE NAME	Name of the standard file applicable to the client
FILE CONTENT	File content corresponds to the different items to be filed
FILED	If the checkbox is ticked this means that the document has been properly filed
DATE	Date of filing
COMMENT	Any relevant free comment
DOCUMENT FILE NAME	Document number of the associated documents store in the document module
DOCUMENT NAME	Name of the associated documents store in the document module

User will be able to print an EXCEPTION report and follow up on collecting missing items

(DeMo 2016) ABACAB - Files content by Company / Person

Company: Company / Person: A&T Equity S à r.l. Refresh

File:

File content:

Filed: (All)

Sort: Company/Person Ascending

File name	Files content	Filed	Date	Comment
COMPLIANCE CLIENT FILE	FORMULAR: UBO	Yes	31/10/2012	
COMPLIANCE CLIENT FILE	Copy of Id/Passport of UBO	No		
COMPLIANCE CLIENT FILE	Registered office contract	Yes	31/10/2012	
COMPLIANCE CLIENT FILE	KYC	Yes	31/10/2012	
COMPLIANCE CLIENT FILE	Job Arrangement letter	Yes	31/10/2012	
COMPLIANCE CLIENT FILE	Copy of Ids/Passports of Directors	No		LUIS 04 03 2012 CHF 29 05 2015
COMPLIANCE CLIENT FILE	Director Mandate - contract	No		

Add
Edit
Delete
Cancel
Add Select
Add all
Document

By clicking on view document user will be able to retrieve the scanned document.

01-00000001.pdf - Adobe Reader

Profession :

Adresse complète :

N° de passeport / carte nationale d'identité :

dont les caractéristiques sont reprises ci-après :

Dénomination ou raison sociale :	<input type="text" value="2502 S A ."/>
Forme sociale :	<input type="text" value="Société Anonyme de droit luxembourgeois"/>
Nationalité :	<input type="text" value="Luxembourgeois"/>
Date de constitution et lieu d'enregistrement :	<input type="text" value="13.11.2007"/>
N° de registre de commerce :	<input type="text" value="B 133613"/>
Adresse du siège social :	<input type="text"/>

Je joins/nous joignons à la présente une copie certifiée conforme de la/des pièce(s) d'identité susmentionnée(s).

Je déclare / nous déclarons également que :

- les fonds détenus directement ou indirectement par la Société n'ont aucun lien avec le financement du terrorisme ni avec les incriminations suivantes : les organisations criminelles, l'enlèvement ou la



eDOCUMENT MANAGEMENT SYSTEM :

The document module allows storing all kind of document (native format) in connection with the clients, companies, persons in the database.

Word – Excel – PDF – eMail – Jpg, ...

All documents are fully secured by a rights management by group or by user.

NB: if a user is not authorized to view a document it will not even be listed in the folder directory

The document module offers advanced and easy feature to transfer document from email to documents or from document to email.

(DeMo 2016) ABACAB - Document

Documents Detail

A&T Equity S.à r.l.

- (Documents without folder)
- COMPLIANCE
- ACCOUNTS
- CORRESPONDANCE
- LEGAL

Document Name	Number	Ref. Date	Creation Date	Edition Date	Emp.	Type	Status	EMail Author	EMail To	EMail Subject	EM
2014-6-23 Notes for James on Malta Companies	00001363	22/07/2014	22/07/2014	22/07/2014	THD						
Job arrangement letter (signed)	00001338	18/07/2014	18/07/2014	18/07/2014	THD						
kyc (signed)	00001340	18/07/2014	18/07/2014	18/07/2014	THD						
MANDATE ACCEPATATION LUS-00115788	00001341	18/07/2014	18/07/2014	18/07/2014	THD						
MANDATE ACCEPATATION CHF-00115789	00001342	18/07/2014	18/07/2014	18/07/2014	THD						
Registre office agreement (signed)	00001339	18/07/2014	18/07/2014	18/07/2014	THD						
UBO (signed)	00001337	18/07/2014	18/07/2014	18/07/2014	THD						



CRM - RELATIONS:

Relation module allows tracing all type of relations (beneficial owners, Directors, ...)

This module allows to fully securing confidential data by user, group of users, company, persons and even relation type.

(DeMo 2016) ABACAB - Search Company / Person Relation - (Show mode)

Relation: Company / Person:

Category:

Relation type:

Start-end date: ... 11/10/2018 ... Search Active Relation end date

Display type:

Sort by: Ascending

Main Detail

Company / Person	Relation type	* Sel.	Start date	End date	Signature	Shares	Type of shares
Fender Christophe (10/07/1965)	is Manager (B Category) of	A&T Equity S.à r.l.	29/10/2010		Collective with Manager	0	
Summen Luc (22/12/1961)	is Manager (B Category) of	A&T Equity S.à r.l.	29/10/2010		Collective with Manager	0	
DMS & Associés S.à r.l.	Domiciliation agent	A&T Equity S.à r.l.	29/10/2010			0	
Fatosme Anne	UBO	A&T Equity S.à r.l.	29/10/2010			10	
Taberna Echague Elena	UBO	A&T Equity S.à r.l.	29/10/2010			10	
A&T Gestion SICAV-SIF SCA	Partner	A&T Equity S.à r.l.	29/10/2010			0	
Agumaza Javier (14/01/1950)	UBO	A&T Equity S.à r.l.	29/10/2010			25	Direct ownership
Agumaza Jaime (14/02/1978)	UBO	A&T Equity S.à r.l.	29/10/2010			25	Direct ownership
Agumaza Lourdes	UBO	A&T Equity S.à r.l.	29/10/2010			25	Direct ownership
FATOSME (14/02/1978) Jaime Agumaza	Manager - A Category	A&T Equity S.à r.l.	29/10/2010		Collective with Manager	0	
Fender Christophe (10/07/1965)	Invoice contact	A&T Equity S.à r.l.	01/01/2018			0	
ITPS (Luxembourg) S.A.	Business provided by	A&T Equity S.à r.l.	15/10/2010			0	

Info on Company/Person (AT Equity S.à r.l.)

Phone Type	Phone Number/Email
Mobile 1	0034 609 027 051
Email	AT@sdna.lu
Address COURRIER	1, route d'arlon / L-1234 Luxembourg / Luxem...
Address DOMICILE LE	43, Boulevard du Prince Henri / L-1724 LUXE...

Info on relation (Fender Christophe (10/07/1965))

Phone Type	Phone Number/Email
Mobile 1	621 16 43 19
Tel 1	0033 3 82 56 96 70
Email	christophe.fender@dms.lu
Address COURRIER	7, rue des Ormes / F-57970 Stuckange / Fran...
Address DOMICILE LE	23, rue des Bruyères / L-1274 Howald / Luxe...

Add

Edit

Delete

Cancel



BLACKLIST

Blacklist is designed to allow users to scan their databases with information of the sanctions lists.



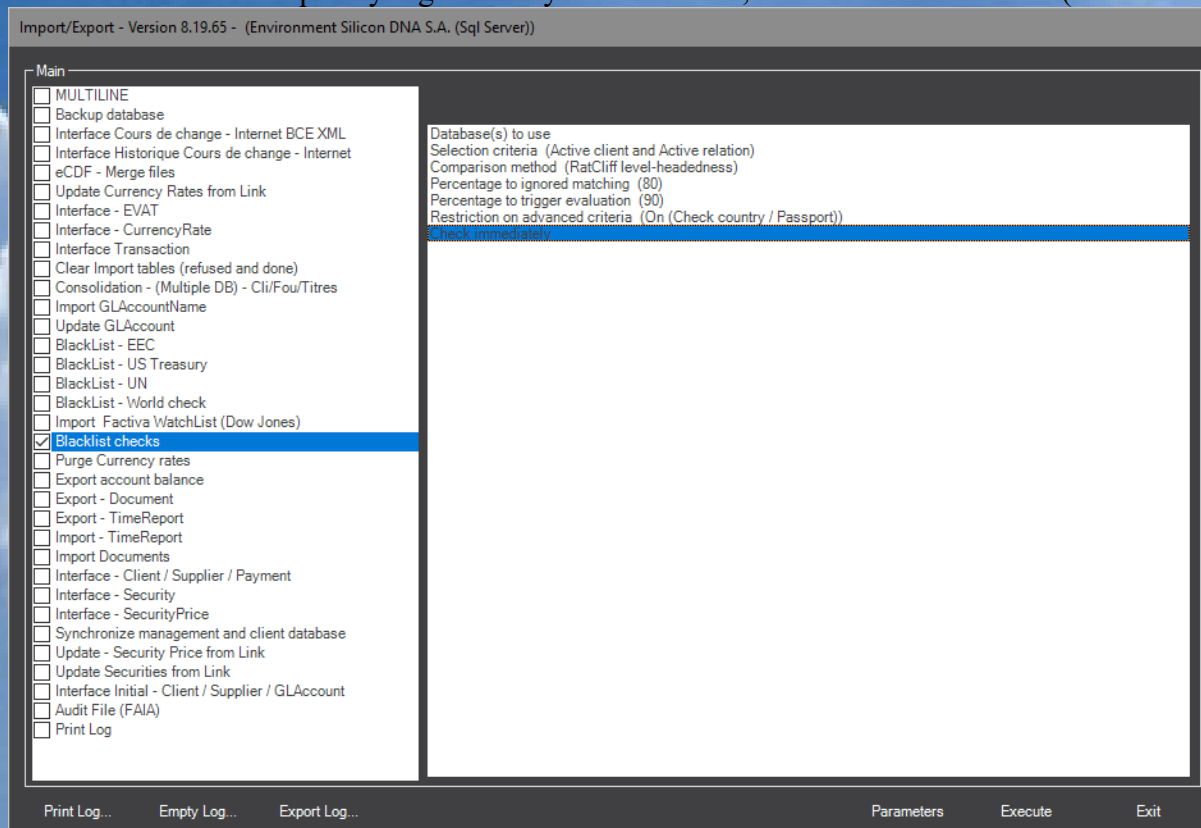
PARAMETERS

BOUTON IMPORT (listing all available interfaces)

- BlackList EEC (European community)
- BlackList UN (United Nations)
- BlackList US TREASURY (US Treasury)

These three lists are free list published on the internet.

For clients adequately registered by World-Check, there is also a interface (black list and PEP).





This feature starts the checks with the selected databases



Ratcliff/Obershelp pattern recognition

The Ratcliff algorithm computes the similarity of two strings as the doubled number of matching characters divided by the total number of characters in the two strings. Matching characters are those in the longest common subsequence plus, recursively, matching characters in the unmatched region on either side of the longest common subsequence.

Examples

The similarity of ALEXANDRE and ALEKSANDER is $2 * (3+3+1+1) / (9+10) = 84\%$ (matching ALE, AND, E, R).

Ratcliff headedness

This is a variant of the original Ratcliff algorithm done to give a weight to the contiguous text sequence packages identified. The more contiguous letters in the two text string compared the to reduce the match percentage based on a ponderation of the continued text sequence

ALEXANDRE in DMS (9 letters)

ALEKSANDER in the blacklist (10 letters)

ALE pos 123 in DeMaSy and pos 123 in Blacklist $\Rightarrow 3-3 = 0 \Rightarrow [100 - (0/9 * 100)] = 100\%$

AND pos 567 in DeMaSy and pos 678 in Blacklist $\Rightarrow 7-8 = \text{Abs}(-1) \Rightarrow [100 - (1/9 * 100)] = 55,55\%$

E pos 9 in DeMaSy et pos 9 in Blacklist $\Rightarrow 9-9 = 0 \Rightarrow [100 - (0/9 * 100)] = 100\%$

R pos 8 in DeMaSy et pos 10 in Blacklist $\Rightarrow 8-10 = \text{Abs}(-2) \Rightarrow [100 - (2/9 * 100)] = 77,77\%$

WEIGHT

$2 * (3 * 100\% + 3 * 55,55\% + 1 * 100\% + 1 * 77,77\%) / (9+10) =$

$2 * (4,88) / (9+10) = 51,36\%$ instead of 84%

Blacklist interface results

BlackList

BlackList | Detail

Global result

	In database	Evaluated
Number of companies:	1861	586
Number of persons:	1387	658
Total	3248	1244

Company/Person: Status:

Company/Person	Type	% max	Interface type	Status	User
IAMCO S.A.	Company	100 %	US Department of Treasury	Pending	

Comment:

See Reset Exit

The status given to all matched



items is PENDING.

The authorized user can confirm the acceptance of the relation by double clicking on the record after the review of all the matched items on the detail tab. The status becomes either ACCEPTED or REFUSED.

The acknowledging user and the date/time of the action is traced by the application database.

**DETAIL TAB**

BlackList [Detail]

Alias:

InterfaceType	Alias	Percentage
US Department of Treasury	IAMCO	100%
US Department of Treasury	IAMI	67%
US Department of Treasury	RASCO	60%
US Department of Treasury	TAJCO	60%
US Department of Treasury	Kimo	58%
US Department of Treasury	DIAMOND	57%
US Department of Treasury	IMCOMER	57%
US Department of Treasury	AGOCO	56%
US Department of Treasury	CIDCO	56%
US Department of Treasury	FLACO	56%
US Department of Treasury	PACHO	56%
US Department of Treasury	SISCO	56%
US Department of Treasury	ZISCO	56%
US Department of Treasury	ALCO	53%
US Department of Treasury	AMNO	53%
US Department of Treasury	APCO	53%
US Department of Treasury	BICO	53%
US Department of Treasury	NICO	53%
US Department of Treasury	ADMACOOP	52%

```
- <BlackList>
  <uid xmlns="http://tempuri.org/sdnList.xsd">11195</uid>
  <lastName xmlns="http://tempuri.org/sdnList.xsd">IRAN AIRCRAFT MANUFACTURING INDUSTRIAL COMPANY</lastName>
  <sdnType xmlns="http://tempuri.org/sdnList.xsd">Entity</sdnType>
- <programList xmlns="http://tempuri.org/sdnList.xsd">
  <program>NPWMD</program>
</programList>
- <akaList xmlns="http://tempuri.org/sdnList.xsd">
  <aka>
    <uid>11601</uid>
    <type>a.k.a.</type>
    <category>weak</category>
    <lastName>HEVAPEIMASAZI</lastName>
  </aka>
  <aka>
    <uid>11600</uid>
    <type>a.k.a.</type>
    <category>weak</category>
    <lastName>HAVAPEYMA SAZHRAN</lastName>
  </aka>
- <aka>
```

See Reset Exit

The detail tab list all matches percentage with all source files and store the XML data of the source files. Each time the interface is launched based on updates of source files, all existing records will be scanned and updated if necessary. Only information with higher risk will result in an update of the existing records. All unmatched items are flagged as reviewed as well and any next match would update these records.



SCAN ON A BY CONTACT BASIS

When adding a new company/person the user will be allowed to scan real time based on the existing source file on the server.

A Blacklist (**BLACKLIST** or **BLACKLIST**) button exists on the company/person screen.

This button is flashing red when no scan has been done yet.

If the user click the button the scan is initiated and the results are displayed real time.

DeMio 2016 ABACAB - Company - (Show mode)

Man Legal Compliance VAT Tax Annual accounts Other Menu KYC Shareholding

Company / Office: AT Equity S.r.l. --

Type / Category: S.r.l. COMMERCIALE Nbr. 48

Tax / INTRACOM VAT number / File Number: 0102478022 107248788

Number / RC Number: 0156756

Phones and Faxes

	Phone type	Phone number	Comment
Mobile 1		0034 609 027 051	

Addresses

Recipient	Type	Building	N°	Street	Code	Locality	Country	Region	Comment
	COURRIER		1	Route d'Arden	L-1234	Luxembourg	Luxembourg		
	DOMICILE LEGAL	43		Boulevard du Prince Henri	L-1724	LUXEMBOURG	Luxembourg		

E-Mail

Type	E-Mail address	Comment
PROFESSIONNELLE AT Equity S.r.l.	AT@siliconDNA.lu	

Right sidebar:

- Add
- Edit
- Delete
- Cancel
- Relations
- Documents
- Bank account
- Capital
- Authorized capital
- Files content
- Publications - Mail
- Periodic duties
- Calendar list
- Import
- Transfer
- Blacklist**
- Signatures
- Entity
- Exit



REPORTING:

Based on all the informations store in the database (company/person/relations/File content) specific reports have been designed to allow following up and monitoring the risks.



(DeMo 2016) ABACAB - Report select

- + ENVELOPES - LABELS
- + HUMAN RESSOURCES
- + AGENDA - REMINDERS
- + DOCUMENTS
- + CURRENCY - COUNTRIES
- + CLIENTS LISTS - PROSPECTS
- **RELATIONS - COMPLIANCE**
 - ... Company full details
 - ... Person full details
 - ... Company full details (V6)
 - ... Person full details (V6)
 - ... Companies Informations
 - ... Persons Informations
 -
 - ... Bank Accounts
 - ... Bank Accounts - Authorized signature
 - ... Authorized signatures by company/person
 -
 - ... Relations
 - ... Relations (CLIENTS)
 - ... Relation types
 -
 - ... KYC
 - ... KYC Groups and Question list
 - ... Files content (Company/person)
 - ... Files content (Clients)
 - ... Files content (Clients) - Assignment
 - ... STR follow up
 - ... Cash Transaction monitoring
 - ... Blacklist
 -
 - ... Document filing / Archives
 - ... Publications
 - MATURITIES -----
 - ... Ongoing review follow up
 - ... Maturity of Passport and identity cards (Clients)
 - ... Maturity of Passport and identity cards (Persons)
 - ... MATURING RELATIONS
 - MALTA-----
 - ... UBO Register (Malta) - FORM B01/02/03
- + CSSF
- + CORPORATE SOCIAL EVENTS
- + SHAREHOLDER REGISTER
- + ASSIGNMENTS
- + SCHEDULING
- + TIMEREPORT
- + INVENTORIES
- + LEDGERS
- + TASKS & PROJECT MANAGEMENT
- + BILLING
- + CLIENTS
- + SUPPLIERS
- + WISE TRANSFER ORDER

OK

Favourite reports

Exit

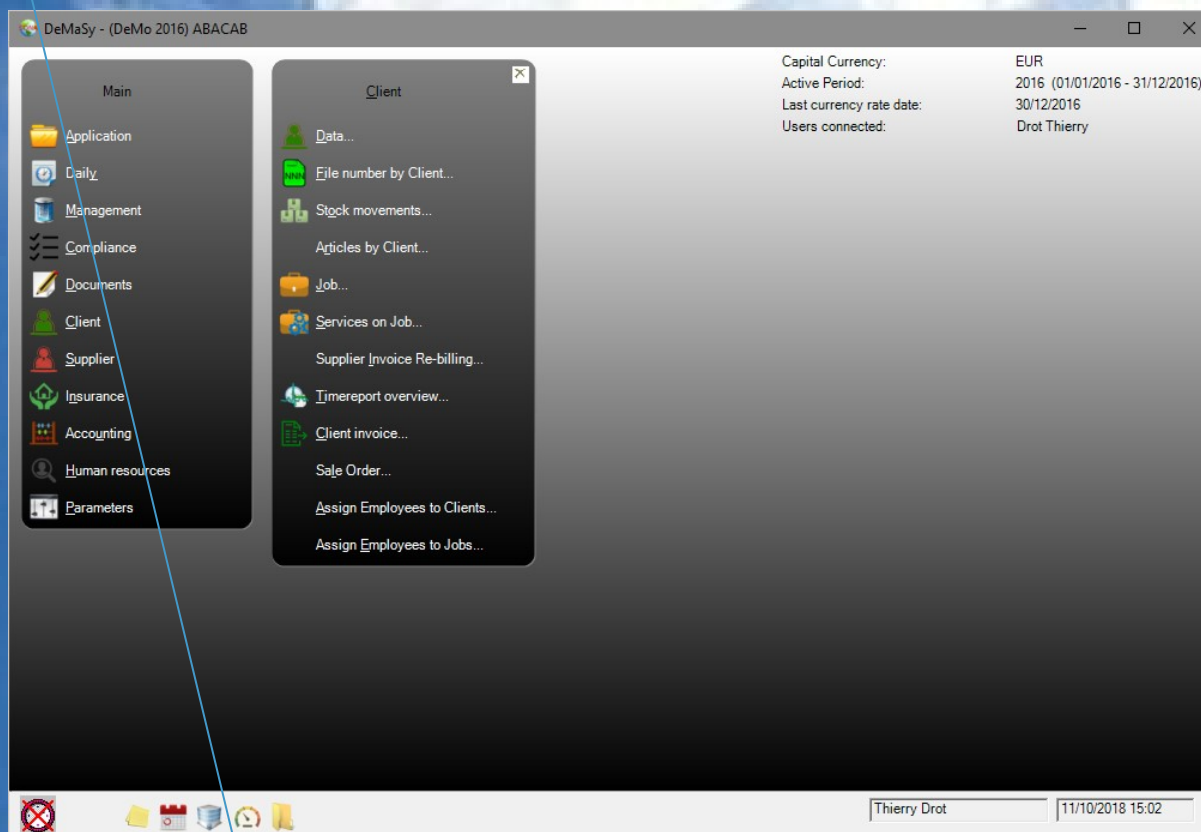


MANAGE YOUR BUSINESS WITH ONLY ONE SOFTWARE



DeMaSy – REAL TIME COMPLIANCE – *DASHBOARD IT!*

On top of the existing extended compliance features DeMaSy has been enriched of a real time dashboard allowing managements and supervisor to follow up day to day on clients' status and to overview compliance with deadline and due diligences.





DASHBOARD

[THDHOME] - Dashboard grid - (Show mode)

Assigned employee on client:
Assigned employee on job:
File holder:
Client:

Refresh

Name	VAT Frequency	LAST PERIODIC VAT return	Next PERIODIC VAT return due date	Last YEARLY return filed	Next YEARLY VAT return due date	EC sales tax frequency	Last EC sales tax return filed	Next EC sales tax due date	Last tax return filed	Next tax return due date	Last annual accounts filed	Next annual accounts due date	Last MFSA return date	Next MFSA return due date	Next corporate tax due date	Shareholders' meeting date	Next Shareholders' meeting	Last reporting date	Next reporting due date	KYC	File content	Relations	Last Timespot activity	Assignments
ABACAB Sarl	Missing	31/12/1995	N/A	N/A	N/A	N/A	N/A	N/A	31/12/1995	Missing	Missing	N/A	N/A	N/A	01/01/2017	N/A	N/A	N/A	N/A	Missing	Missing	OK (7)	19/04/2016	OK (1)
DMS & Associates Sarl	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Missing	Missing	Missing	N/A	N/A	N/A	01/01/2017	N/A	N/A	N/A	N/A	Missing	Missing	OK (8)	Missing	OK (5)
Dnet Theory	Quarterly	30/09/2016	15/03/2017	31/12/2015	01/03/2017	Quarterly	31/12/2015	31/01/2017	31/12/2015	31/05/2017										Missing	Missing	OK (16)	17/12/2013	OK (1)
Real Solutions S.A.	Quarterly	30/06/2015	15/12/2015	31/12/2014	31/10/2016	Quarterly	30/06/2015	15/12/2015	31/12/2014	30/06/2016	31/12/2014	30/06/2016	N/A	N/A	31/05/2017	every last saturday of june	24/06/2017	30/06/2015	15/10/2015	0/0	To check (6)	OK (7)	04/04/2016	OK (2)



DASHBOARD

User can select his clients based on assignments and/or File holder

Options allow to activate the relevant information (columns) to be used and displayed

VAT Frequency	From company/person details
LAST PERIODIC VAT return	From company/person details
Next PERIODIC VAT return due date	Calculated field
Last YEARLY return filed	From company/person details
Next YEARLY VAT return due date	Calculated field
EC Sales list frequency	From company/person details
Last EC Sales list return filed	From company/person details
Next EC Sales list due date	Calculated field
Last Tax return file	From company/person details
Next Tax return due date	Calculated field
Last annual accounts filed	From company/person details
Next annual accounts due date	Calculated field
Shareholders' meeting date	From company/person details
Next Shareholders' meeting	Calculated field
Last reporting date	From company/person details
Next reporting due date	Calculated field
KYC	Will indicate "missing" in red/orange or "To check" and the number of open questions
File content	Will indicate "missing" in red/orange or "To Check" and "To check" in red and the number of open items to follow upon
Relations	Will indicate the number of maturing relations in red/orange or "OK" and the number of open relations
Last Timereport activity	Will indicate the last timesheet date on client jobs (in Red if last is over a year)
Assignments	Will indicate OK and the number of active assignment or "To check" in red if there is no client or job assignment
Receivables	Will indicate "To check" in red/orange and the number of matured receivables or OK and the number of outstanding receivables
Reminders	Will indicate in red/orange the number of due/soon due reminders Or the number of outstanding reminders
Tasks	Will indicate the number of open due/soon due tasks in red/orange
ID card maturity	Will indicate the ID card maturity date (in red if matured or orange when soon matured)
Passport maturity	Will indicate the passport maturity date (in red if matured or orange when soon matured)



By double-clicking any line the user can request a real time INTERACTIVE summary

Each **Yellow highlighted** item will be calculated by DeMaSy
Most of the data can be modified in the grid without loading any other screen.
Based on parameters Colors will changed (Blue / Orange / Red) depending on the soon coming or passed deadline

SUMMARY
a real time

DASHBOARD REAL TIME INTERACTIVE
By double-clicking any line the user can request INTERACTIVE summary

DeMaSy - *** TESTS ***

[THDHOME] - Dashboard grid - (Show mode)

Assigned employee on client: Drot Thierry
Assigned employee on job:
File holder:
Client:

Name	VAT Frequency	LAST PERIODIC VAT return	Next PERIODIC VAT return due date	Last YEARLY return filed	Next YEARLY VAT return due date
ABACAB Sàrl	Missing	31/12/1995	N/A	N/A	N/A
DMS & Associés Sàrl	N/A	N/A	N/A	N/A	N/A
Drot Thierry	Quarterly	30/09/2016	15/03/2017	31/12/2015	01/03/2017
Real Solutions S.A.	Quarterly	30/06/2015	15/12/2015	31/12/2014	31/10/2016

EC SALES LISTING

[EC list frequency: Quarterly](#)
[Last EC sales list return filed: 31/12/2015](#)
[Next EC due date: 31/01/2017](#)

TAXES

[Last tax returned filed: 31/12/2015](#)
[Next tax return due date: 31/05/2017](#)

COMPLIANCE

FILE CONTENT:

[COMPLIANCE Arrangement letter](#)
[COMPLIANCE Articles of incorporation](#)
[COMPLIANCE Beneficial owner form](#)
[COMPLIANCE KYC form](#)
[COMPLIANCE Passport copy Yes](#)
[COMPLIANCE Powers of signatures](#)

Maturity ID

Thierry Drot - 31/12/2017

Maturity passports

Thierry Drot - 31/12/2017

KYC

[Filled in: Missing](#)
[Number of question raised 0](#)
[Number of question answered 0](#)
[Number of non answered questions 0](#)
[Score: 0](#)
[Client risk level 0](#)

ACTIVE RELATIONS:

[*** TESTS *** Manager Drot Thierry From 01/01/2009](#)
[*** TESTS *** Statutory auditor \[inverse\] Drot Thierry From 01/01/1997](#)
[A.D.R. Employee Drot Thierry From 01/01/2008](#)
[Acraft S.A. Manager Drot Thierry From 01/01/2008](#)
[Acraft S.A. BOD Member Drot Thierry From 01/01/1998](#)
[B.A.H.A. Contact of Drot Thierry From 01/01/2012](#)
[C.E.L. Contact of Drot Thierry From 01/01/2012](#)
[D.S.D. International Contracts Contact of Drot Thierry From 01/01/2012](#)

All underline items listed will be clickable and access and load the *relevant screen* of DeMaSy and allow direct access to the clicked item.

The summary report can be sent straight to the printer.