



SCANNER IAML

USER MANUAL V. 1.2

















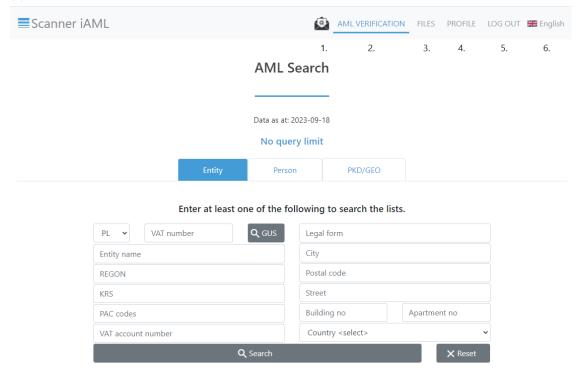
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I. Scanner iAML - features

The iAML Scanner application allows individual queries to be made on the occurrence of persons, entities, industries or countries on Restrictions Lists. Below is a description of the application's tabs.



- 1. Messages tab for communicating application-related messages to users.
- 2. AML verification panel designed to check the presence of individuals, entities, industries and countries on Restrictions Lists.
- 3. Files a possibility of downloading Restrictions Lists in the form of a file in a pre-selected format. This tab is only available for users who have access to the lists in the form of a file.
- 4. Profile the tab allows you to select the range of sanction lists used by the application and, for authorised users, allows you to generate and download the API key.
- 5. Logout button to log out of the user account.
- 6. Language possibility to select the language of the application.

1. AML verification

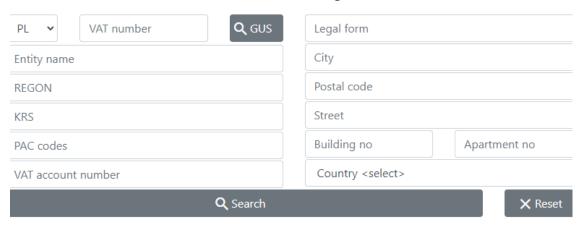
1.1. Entity

The tab is used to determine entities for their appearance on Restrictions Lists. Based on data from the CRBO (Central Register of Beneficial Owners), the organization's beneficial owners will be revealed, which will also be subject to a check of their appearance on the Restrictions Lists.





Enter at least one of the following to search the lists.



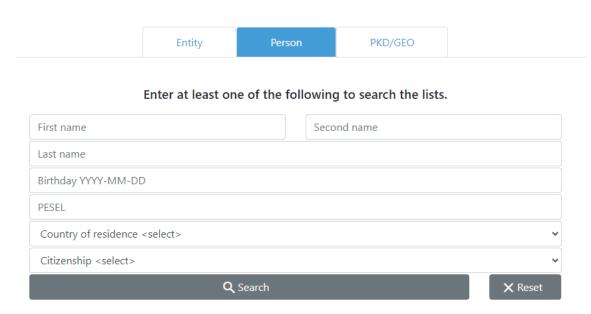
In order to run search, it is required to enter one or more of the following data:

- a) VAT number Entering the entity's VAT number allows a precise search in the Restrictions Lists. The "GUS" button allows the user to automatically complete the remaining data on the basis of the Central Statistical Office database. Entering the VAT number also allows the user to enlist data on beneficial owners who are officially reported in the CRBO;
- b) Entity name supplementing the name of the entity makes it possible to search the company on sanction lists and the KNF (Financial Supervision Authority) warning list; this is an <u>obligatory criterion</u>;
- c) KRS complementing the KRS number makes it possible to search for an entity on the KNF's List of Public Warnings, with the reservation that not all entities have an assigned KRS number;
- d) PKD codes filling in the PKD codes makes it possible to check whether a given activity appears on the list of high-risk industries. The format that should be entered is the PKD code in the structure without full stops or commas, and subsequent PKD codes should be separated by a space. Example of completion: 6419Z 6399Z 6391Z 6312Z 6311Z 6209Z 6203Z;
- e) VAT account number filling in this field makes it possible to check the presence of a bank account on the white list of VAT taxable persons. In order to do so, you need to enter a pair of data - VAT number and bank account number. In response, you will receive information as to whether the specified VAT number is associated with the specified bank account;



- f) Additional fields: organizational form, city, postal code, street, house number, premises number - do not directly affect the result. They are a supplement to the entity data that will appear on the PDF report;
- **g)** Country by selecting a country we can check whether it is on the list of high-risk countries.

1.2. Person



This tab is used to check individuals. Below is a description of the form fields that appear:

- a) personal data (first name, second name, last name) by entering the surname alone, it is possible to search on sanction lists, the PEP list, the RCA and the KNF. In the "surname" field, it is possible to enter all personal data. Entering a first name and a second name narrows down the search; last name is a obligatory criterion;
- **b) birth date** (YYYY-MM-DD) adding the date of birth allows the search results to be narrowed down. By entering first name, surname and date of birth at the same time, it is possible to search for companies in which the person is a beneficial owner. However, this only applies to persons for whom no PESEL number was provided in the CRBO notification;
- c) PESEL Entering the PESEL number allows us to determine the person's presence on the PEP, RCA list. It also allows us to search the companies in which the person is a beneficial owner. However, this only applies to persons for whom a PESEL number has been entered in the application. On sanction lists, PESEL numbers do not appear;
- **d) country of residence, citizenship** selecting the country of residence and nationality does not narrow down the search. It is intended to check the presence of a country on the list of high-risk countries.

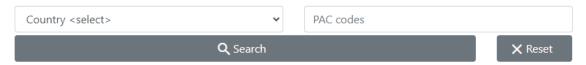


1.3. PKD/GEO

1.3.1. Country



Enter at least one of the following to search the lists.



This tab provides information on whether a country is on the high-risk list and to determine the category of risk assigned. Below is an example of the outcome of the search.

1.3.2. PKD

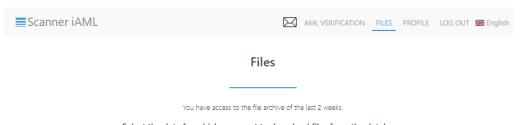


This tab gives you the opportunity to check whether an industry is on the high-risk list, according to the Polish classification of activities. The indicated codes are assigned to appropriate descriptions indicating "restrictions in activity". The example indicated explicitly defines that the risk applies only to luxury goods.

2. Files

The tab is used as a platform for downloading lists in the form of files, including archived lists. Files with PEP, RCA and sanctions lists are available with both the entire database and daily increments. In contrast, the lists of high-risk countries and industries and the list of FSC warnings only appear as a whole database. Each authorised user has the possibility to download a specific file up to 2 weeks back. Files are available in JSON, CSV and XML formats. There are currently 34 file services available, characterised by different scope, format, structure or coding.





Select the date for which you want to download files from the database:

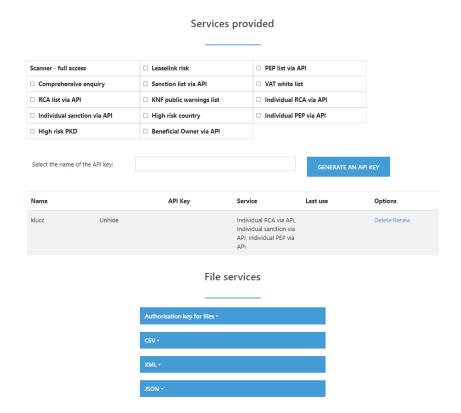
08.06.2023

Name	File format	File size	File
GWL PEP and RCA - the whole database	.xml	3МВ	◆ DOWNLOAD
High risk activities	.json	4KB	◆ DOWNLOAD
High risk countries	.json	24KB	◆ DOWNLOAD
KNF warning list	.json	11KB	◆ DOWNLOAD
PEP - daily changes	.json	100kb	♦ DOWNLOAD
PEP - daily changes	.CSV	2KB	♠ DOWNLOAD
PEP - daily changes	.CSV	2KB	♠ DOWNLOAD
PEP - the whole database	.json	змв	DOWNLOAD

NOTE: Database files are made available daily (including weekends). In order to take care of the validity of the data, the files should be downloaded regularly every day.

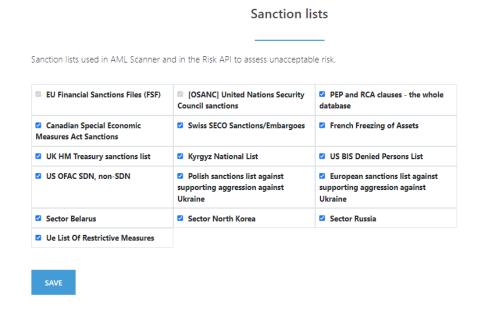


3. Profile



The tab serves as a place to manage the licences held. It allows authorised users to generate API keys and also shows the data assigned to the account.

In this tab, the licence administrator has the authority to manage the range of sanction lists against which analyses will be carried out. The selection of the range of lists by the administrator will affect other users using the same licence.

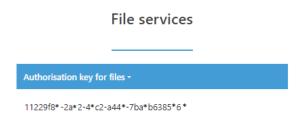




NOTE: Two mandatory sanction lists (EU and UN) are automatically assigned to the licence. To increase the scope of the lists, the desired lists must be added by ticking the

3.1. API key generation

To generate an API key, select the services for which the key is to be assigned, enter any key name and then confirm via the "Generate an API Key" button. The generated key will appear in the table below. To view the key, click the "unhide" button. If the user has access to file services, the Profile tab will contain the file authorisation key.



4. PDF Report

The user has the option of saving the result of the search in the form of a PDF file, which will contain precise information regarding, among other things:

- 1) the user, date and time of search;
- 2) search criteria, e.g. the name of the entity;
- 3) a detailed search result showing on which Restrictions List the entity or person is placed.





User: Incaso Group sp. z o.o., Cos, 2023.09.19 12:32:22

The document is taken from the iAML scanner information system maintained by Incaso Group Sp. z o.o. The report was generated based on data from 2023.09.18.

Search criteria:

Entity name: Alagir Resistor Factory

NIP:: KRS: PKD:

Address: , /

Results of the search for AML verification:

Sanction lists: sector_russia-entity-211 - Aktywny Name: Alagir Resistor Factory Consolidated list: LISTA SANKCJI SEKTOROWYCH - Rosja Organisation: Rada Unii Europejskiej Function: Status: Aktywny https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02014R0833-20220413 Reason: Legal basis: Lista podmiotów wskazanych w załączniku nr IV do Rozporządzenia Rady (UE) nr 833/2014 wraz z aktami zmieniającymi z dnia 31 lipca 2014 r. dotyczące środków ograniczających w związku z działaniami Rosji destabilizującymi sytuację na Ukrainie Sanction lists: ch-seco-55597 - Aktywny Name: Alagir Resistor Factory Consolidated list: Swiss SECO Sanctions/Embargoes Function: Status: Aktywny KNF warning lists: No results Higher risk countries: No results Beneficial Owners: No results VAT white list: No data needed for search

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Working hours Mon-Fri 8:00-16:00



II. Interpretation of results and good practices

1. Sanction lists

The sanction lists include both entities and individuals. The application indicates as many similar hits as possible so that the user can make a final decision. Apart from the list provided by the Ministry of the Interior and Administration, no list has data such as **VAT number** or **PESEL number**.

Entities: To check whether an entity is on the sanction lists, enter the correct name of the entity in the "entity name" field. Then, after clicking on the "search" button, search will be executed.



RECOMMENDATION: We recommend that you search for entities by name only, without legal forms, as the application searches for each element of the phrase

For example: "X limited liability company".

The iAML scanner searches all four words, so it will find all limited liability companies that are listed and all entities that have "X" in their name. So to make the results more accurate, it is advisable to use the name of the entity itself. In addition, if we use the name itself we can hit the aliases that are found next to some records. These allow to additionally identify the potential entity.

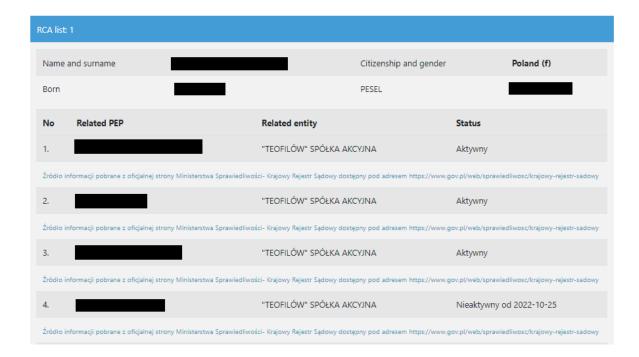
Individuals: We recommend that users provide only first and last name on sanction lists for full search. Only this data is included in all sanction lists. Searching for a person by other data may lead to non-appearance, despite the record being in the database. Entering a date of birth does not narrow down the search result. The final decision of the result is up to the user.



2. PEP/RCA List

Due to the lack of complete coverage of databases with PESEL numbers and dates of birth, we recommend that users check using only first and last name. Any additional information contained in the search criterion will narrow down the results.





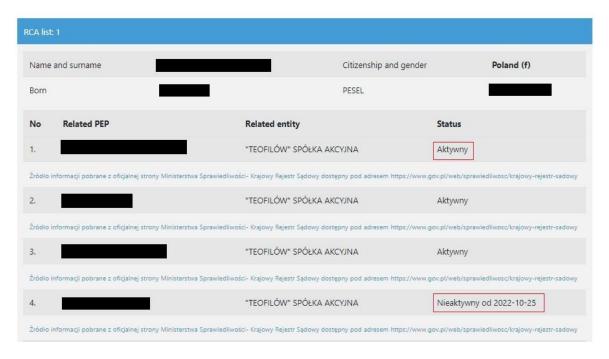
2.1. PEP/RCA status and source

Each time a check is executed, the user is informed of the current status of the respective PEP/RCA:

 a) active - in the case of PEPs, it provides information on the active holding of a politically exposed position. However, for RCAs, information is additionally provided on which PEPs (active and inactive) the RCA is currently working with and which companies it is affiliated with;



b) inactive - in the case of a PEP, it shall indicate the date from which the person ceased to hold a position in a politically exposed position or a close associate of the PEP. Such persons continue to be included in the database on the basis that, for not less than 12 months from the date the PEP/RCA ceased to hold the position, the obliged institution shall apply higher risk measures to such person (transition period). Upon cessation of the position and expiry of the transitional period, the person shall be removed from the database.



In addition, the publicly available source of information from which the personal data on the person being searched was taken is indicated. This is due to the implementation of the conditions for re-use based on the provisions of the Act of 11 August 2021 on open data and re-use of public sector information.

3. KNF warning list

As there is no unified number identifying an entity (KRS, NIP or REGON) on the KNF warning lists, we recommend users to enter only the names of entities without legal forms and without additional data in the form of NIP, KRS or REGON. Each additional piece of information in the search criterion narrows the results.

4. CRBO

Entities: To search an entity against CRBO data, a VAT number must be provided.



Persons: In order to search for the real beneficiary, the PESEL number or the name and date of birth must be provided (in the case of persons for whom no PESEL number has been registered in the notification).

In addition, the user will obtain information on related parties and their beneficiaries. The names of related companies will additionally be checked against the Restrictions Lists.

