

DOW JONES AND COMPANY, INC.

2018 Data Quality Report

Experienced, global team of multilingual researchers combined with innovative automation

OUR RESEARCH TEAM & SOURCES [PG.11]



500 quality checks per month on new and existing records

DATA ACCURACY [PG.13]



We process standard priority sanction updates within one business day of publication

TIMELINESS [PG.15]



LETTER FROM GUY HARRISON

It is with great pride that I introduce the 2018 Dow Jones Risk & Compliance Data Quality Report, sharing information and statistics about our performance over the previous year. We value the investment our clients make in our solutions and know that being transparent about our performance is critical to building and maintaining a trusted relationship.

Dow Jones has a rich tradition stretching back to 1882 of serving customers who demand the best data to make critical business decisions. Since 2000 our Risk & Compliance team has focused on supporting our clients in their mission to better understand, mitigate and avoid regulatory, commercial and reputational risk. More specifically we are focused on providing data solutions to help organizations with their anti-money laundering, anti-bribery & corruption and sanctions compliance programs.

In the past year we have seen tremendous scrutiny around the issue of media reliability and trust, as well as a continued focus from regulators on transparency and effectiveness in counterparty due diligence. These issues have highlighted the importance of data quality in the fight against financial crime.

Dow Jones is committed to continuing its role building on our unique access to global media and multi-lingual and experienced analysts to provide the highest quality data to financial institutions and global corporations. We aim to supply the most accurate, timely and relevant information, that allows our customers to take risk decisions more quickly and with more confidence.

This year's report highlights the successes of our research team over the past year. Recent examples of our timely reaction to customer requirements:

- **Enhanced PEP coverage** - in order to accommodate changes in domestic PEP regulations, an expanded research team created more than 82,000 PEP profiles and nearly 10,000 RCA profiles during the past year for 16 jurisdictions
- **Expansion of Sanctions Ownership Content** - in response to the changing sanctions environment, including the OFAC and EU 50% rules, Dow Jones has added to this content set, including additional categorization and sanctioned bank branches
- **Additional lists** - content coming under the Sanctions and Other Official Lists data sets
- **High-Risk Factors** - this new data set provides data focused on high-risk sectors of the market - Marijuana-Related Businesses and Money Services Businesses
- **Iran sanctions** - the U.S. government moved to re-impose sanctions related to Iran on November 5, 2018. More than 700 subjects were designated and added to the List of Specially Designated Nationals and Blocked Persons (SDN List). Risk & Compliance moved quickly to make all the necessary changes to the Sanctions data and update the related profiles covering companies owned or controlled by sanctioned subjects

We appreciate your trust and financial investment and give you our commitment that we will continue to provide the very best data to cover the risks that concern you the most.



A large, stylized handwritten signature in black ink that reads "Guy Harrison". The signature is written in a cursive, flowing style.

Guy Harrison

Managing Director

Dow Jones Risk & Compliance

December 13, 2018

QUALITY FOCUS AND CONTINUOUS IMPROVEMENT

Dow Jones Risk & Compliance content contains risk data to help our clients understand, mitigate and avoid regulatory, commercial and reputational risk. Data quality is of utmost importance to this mission.

This report describes how Dow Jones creates, structures and monitors Risk & Compliance content in order to provide accurate, timely and complete data -- continuously improved and delivered when and where our clients require it.

Elements of the Dow Jones model:

- The support of a global, trusted news-gathering organization that emphasizes quality, innovation and customer service
- A clear definition of coverage
- A large team of skilled, experienced multilingual researchers and quality analysts
- Reputable sources from around the world, including local-language sources
- Structured information to surface relevant data and minimize false positives
- Data monitoring for accuracy, validity, timeliness and completeness
- Quick response to customer feedback
- Content and coverage reviews that harness automation so we can continuously improve -- and be nimble in meeting the needs of our clients

DATA COVERAGE

One of the challenges organizations have when setting up and reviewing vendors for their anti-money laundering, anti-corruption and bribery and sanctions compliance programs is that it can be difficult to accurately compare offerings from data providers.

The criteria that providers use for including individuals and entities in lists vary widely, as does the depth and structure of coverage. Expanding the criteria naturally allows providers to build larger lists, which on the surface provides broader risk coverage. However, there is a serious downside to doing this: screening names against larger, less-defined or ill-defined lists increases the likelihood of false positives and the time required to clear names. Inefficiencies in the screening process cause operational delays without mitigating additional risk.

FALSE POSITIVE REDUCTION: CLEARLY RELEVANT

Dow Jones uses a two-pronged data strategy to reduce the number of false positives in screening.

Definition: In a climate of increasing data privacy legislation, carefully selecting the definitions for the individuals and entities going into our database has never been more critical. The margin for error is reduced from day one and the integrity of content within Risk & Compliance is of paramount importance. The integrity of our definitions combined with the categorization of our data mean that they expect to be there and not receive matches on names that are not relevant to their business.

Secondary Identifiers: Dow Jones researchers strive to add secondary identifiers to profiles so that customers can know with reasonable certainty whether or not the party in their data is the same as that in the Risk & Compliance data. These include, but are not limited to, dates and places of birth, gender, original script names, addresses and company identification numbers. Secondary identifiers often are lacking from the original data and are found only by conducting thorough research on relevant open source material.

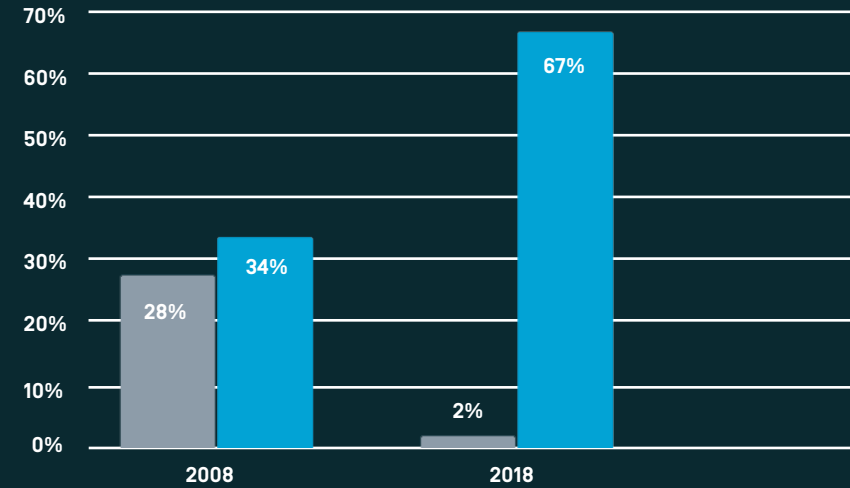
In addition, Dow Jones continually conducts quality assurance using a range of monitoring methods. This leads to long-term quality improvements in areas such as secondary identifiers. For example, the percentage of Risk & Compliance profiles with no secondary identifiers now stands at just 2% compared with 28% in 2008. In the same period, the percentage of Risk & Compliance profiles with two or more secondary identifiers has reached 67% compared with 34% in 2008 and 63% in October 2017. The secondary identifiers included in these calculations are gender, original script name, identity number, image URL, place of birth and date of birth.

In that 10-year time period, the number of profiles has increased from 530,000 to 2.7 million. Dow Jones has emphasized continuous quality improvement even as content has expanded owing to organic growth and the addition of new data sets in response to regulatory changes and customer feedback.

As an illustration of the impact this improvement has had on the data, the percentage of PEP [excluding those categorized as Additional Domestic Screening Requirement profiles, or ADSR] with a date of birth has risen from 41% in 2008 to 63% as of October 2018.

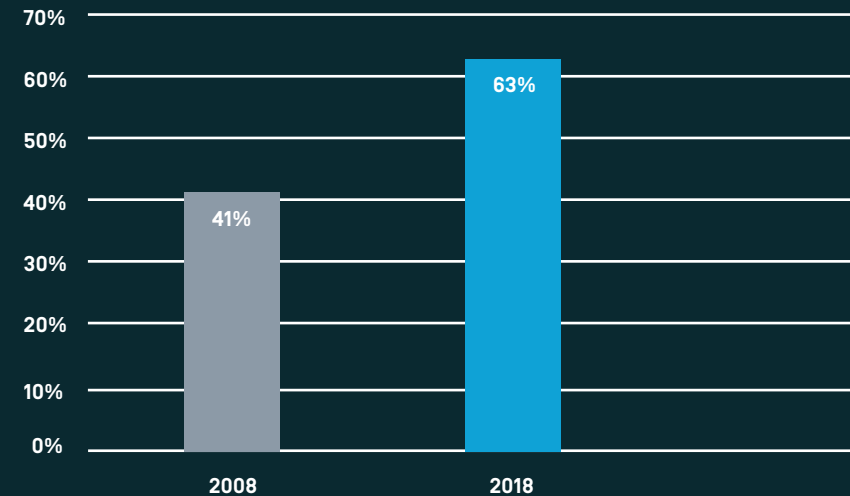
% OF RISK & COMPLIANCE PROFILES WITH MULTIPLE SECONDARY IDENTIFIERS

■ 0 Identifiers ■ 2+ Identifiers



% OF PEP DATE OF BIRTH

(excluding those categorized as Additional Domestic Screening Requirement profiles, or ADSR, i.e., those classified as PEP by a country's national regulation only.)



DOW JONES COVERAGE OF RISK CATEGORIES

The following table sets out Dow Jones coverage of risk categories. Each risk category was carefully defined to ensure the data meets client requirements.

RISK CATEGORY	DESCRIPTION	COVERS PEOPLE	COVERS ENTITIES
WATCHLIST			
POLITICALLY EXPOSED PERSONS (PEP)	22 Occupation Categories covering not only national and regional levels but also international organization officials, enabling users to screen for domestic, foreign and international PEP. Archive goes back to 2001.	✓	
SUBJECTS ON SANCTION LISTS	More than 50 sanctioning bodies*	✓	✓
SUBJECTS ON OTHER OFFICIAL LISTS	More than 400 other official lists*	✓	✓
SUBJECTS ON OTHER EXCLUSION LISTS	More than 85 lists*	✓	✓
SANCTION OWNERSHIP RESEARCH (50% RULE)	Companies owned or controlled by people or entities sanctioned by the U.S. Office of Foreign Assets Control (OFAC) or the European Union: <ul style="list-style-type: none"> • Minimum ownership stake of 10% • A sanctioned individual has a possible controlling interest (either as a member of the board or as a senior executive) 		✓
ENHANCED COUNTRY RISK	In addition to the vessels that appear on sanction or other official lists, vessels that are not sanctioned but are linked to one of the following comprehensively sanctioned countries are included: Cuba, Iran, North Korea and Syria. There are currently almost 1,600 such vessels.		✓
PEOPLE WITH ADVERSE MEDIA/NEGATIVE NEWS (SIP)	People who are reported (on Factiva) to have been formally accused, arrested or convicted of (the archive goes back to 2000): <ul style="list-style-type: none"> • Corruption • Organised crime • Trafficking • Financial crime • Tax crime • Terror 	✓	
RELATIVES OF PEP	31 categories of family members	✓	
CLOSE ASSOCIATES OF PEP	11 categories of close associates	✓	

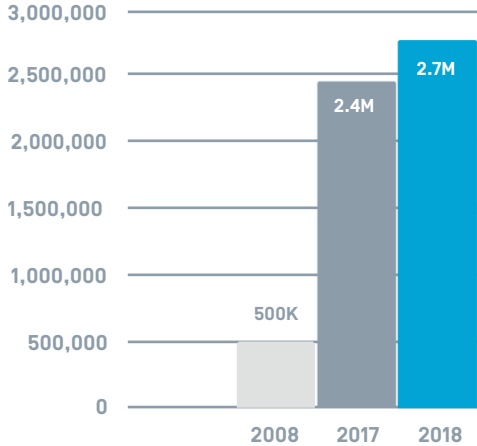
*As of October 2018.

An up-to-date list of our Sanctions Lists, Other Official Lists and Other Exclusions Lists coverage is available [here](#). [Please login to RiskCenter to view.]

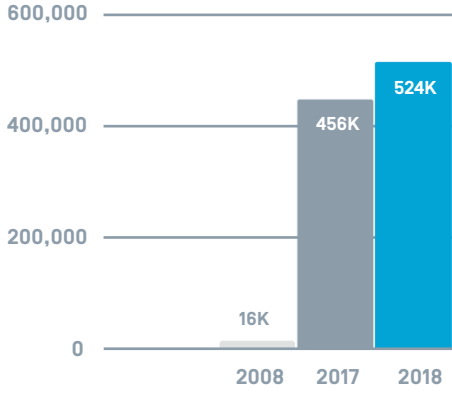
RISK CATEGORY	DESCRIPTION	COVERS PEOPLE	COVERS ENTITIES
STATE OWNED COMPANIES (SOC)			
GOVERNMENT OWNED OR CONTROLLED CORPORATIONS	Corporations owned by federal, regional or municipal governments in every country. The archive goes back to 2008.		✓
ADVERSE MEDIA ENTITIES (AME)			
ENTITIES WITH ADVERSE MEDIA OR NEGATIVE NEWS	<p>Profiles of entities with a corporate structure and commercial purpose that have had adverse/negative media coverage (on Factiva) falling into one or more of 17 categories in four broad areas (archive goes back to 2012):</p> <ul style="list-style-type: none"> • Regulatory • Environmental/Production • Competitive/Financial • Social/Labour 		✓
LOCATIONS			
CITIES & PORTS (LOCATIONS) IN SANCTIONED COUNTRIES	Structured data for regions, sub-regions, cities, seaports, airports and free trade zones in certain sanctioned countries and regions. Coverage includes variations of the place names in English, Chinese, French, German, Spanish, Japanese and the official language of the country to assist with the detection of risk associated with locations in sanctioned countries.		✓
HIGH -RISK FACTORS			
MARIJUANA-RELATED BUSINESSES	Licensed marijuana companies and their associated people and entities in the United States and Canada. Covers states or provinces (and Washington, D.C. and Guam) where there is some form of marijuana legalization and publicly available information on licensees.	✓	✓
MONEY SERVICES BUSINESSES	Entities and individuals that are licensed providers of money transfer services, including currency exchange, check cashing and issuing, cashing or selling money orders in Canada, Hong Kong, Malaysia, Singapore, and the United States.	✓	✓
TRADE COMPLIANCE			
DUAL-USE GOODS	A dataset comprising match phrases used to describe dual-use goods and related information for use in trade compliance screening and related systems. This data is bundled with other datasets (vessels, sanctions and others) in ExImCheck, released by Dow Jones in 2018.		✓

As risk-category coverage has grown, the number of profiles available in Risk & Compliance has increased. The following charts show overall growth, as well as growth in several data sets. 2018 figures are as of October.

OVERALL RISK DB GROWTH

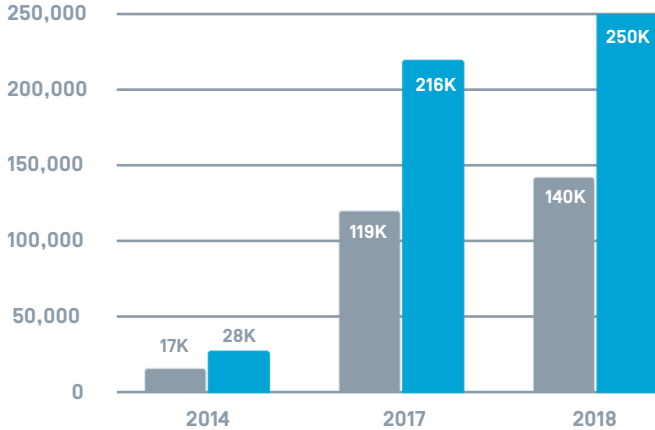


SIP (EXCLUDING LIST PROFILES)

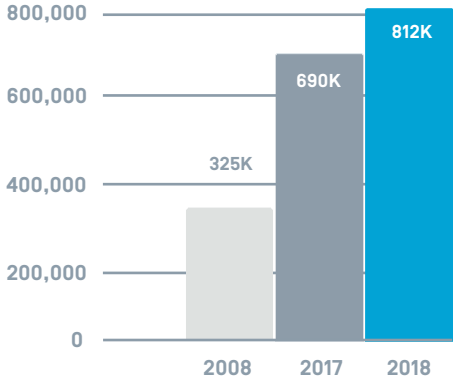


AME

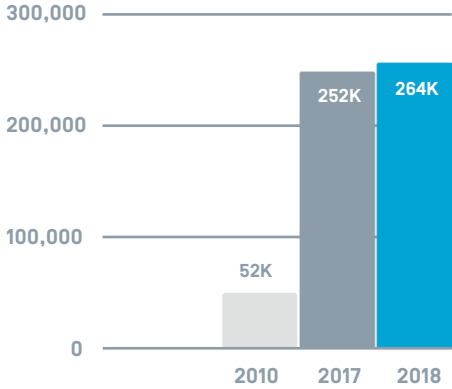
- Profiles covering adverse media issues
- Adverse media issues



PEP



SOC



SANCTIONS OWNERSHIP RESEARCH: UNIQUE CONTENT IN RESPONSE TO THE 50% RULE

This unique Dow Jones Risk & Compliance content set covers companies owned or controlled by people or entities sanctioned by the U.S. Office of Foreign Assets Control (OFAC) or the European Union:

- Minimum ownership stake of 10%
- A sanctioned individual has a possible controlling interest (either as a member of the board or as a senior executive)

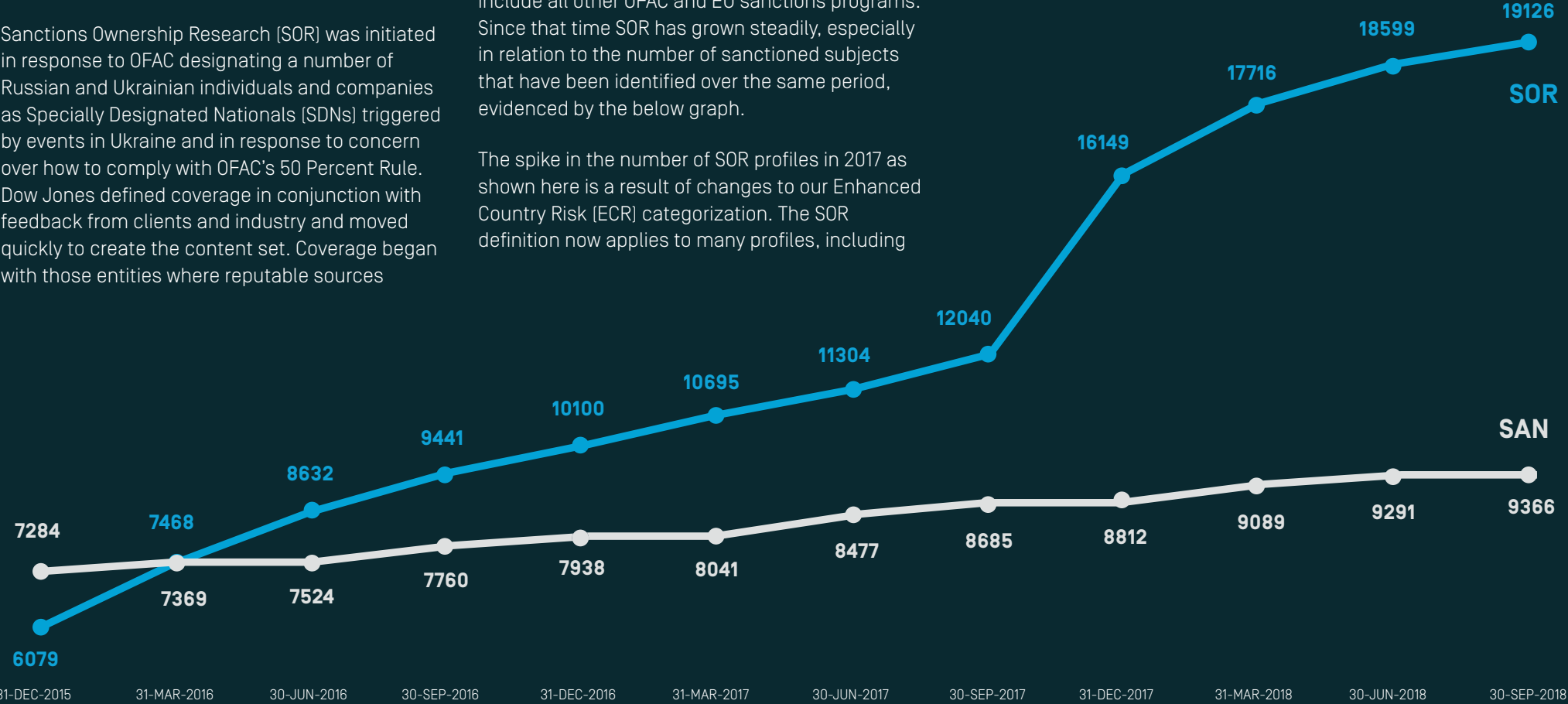
Sanctions Ownership Research (SOR) was initiated in response to OFAC designating a number of Russian and Ukrainian individuals and companies as Specially Designated Nationals (SDNs) triggered by events in Ukraine and in response to concern over how to comply with OFAC's 50 Percent Rule. Dow Jones defined coverage in conjunction with feedback from clients and industry and moved quickly to create the content set. Coverage began with those entities where reputable sources

showed the Ukraine-related SDNs held shares, exercised control or sat on an entity's board of directors. Similar holdings based on further sanctions by both OFAC and the European Union plus OFAC's additional list designation of SSI (Sectoral Sanctions Identifications, Directives 1-4) are included.

Beginning in December 2015, research coverage was extended in response to client feedback to include all other OFAC and EU sanctions programs. Since that time SOR has grown steadily, especially in relation to the number of sanctioned subjects that have been identified over the same period, evidenced by the below graph.

The spike in the number of SOR profiles in 2017 as shown here is a result of changes to our Enhanced Country Risk (ECR) categorization. The SOR definition now applies to many profiles, including

those from Iran, Syria, North Korea and Sudan, which were previously classified as ECR. The SOR OFAC - Regional Sanctions Related tag has also been added to SOC profiles from Cuba and Crimea where the government of those countries owned more than 1% of the companies after January 1st, 2015. These changes have increased the visibility of profiles that are subject to a number of OFAC Regional Sanctions and bolstered an already robust product.



Another feature that enhances our SOR content is the addition of International Securities Identification Numbers (ISIN) for the OFAC SSI program. Owing to OFAC's rules prohibiting certain transactions in debt or equity by U.S. Persons under the SSI program, Dow Jones monitors the issuance of securities and, when possible, where new debt or equity is issued after the effective date of sanctions by any SSI-related entity [both those directly sanctioned as well as any of its holdings included in the SOR content]. These securities are added to the profiles using the ID type International Securities Identification Number (ISIN). In addition to the ISIN itself, where the date of issue and/or the date of maturity can be determined those dates are also included.

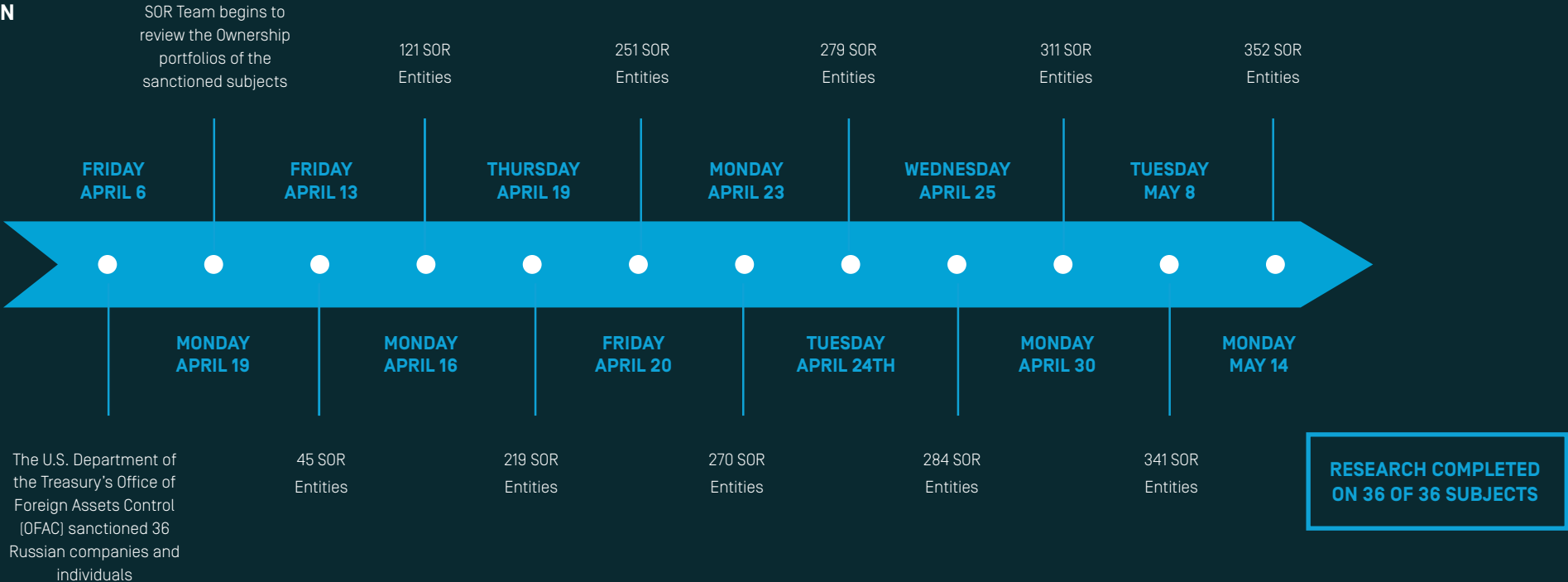
The below chart demonstrates the real-time effort to complete research into entities owned or controlled by the 36 subjects sanctioned by OFAC on April 6th, 2018.

We recognize that capturing all significant ownership stakes gives the most flexibility to risk-management and compliance professionals. While firms must cease dealing with companies who meet strict regulatory ownership definitions, they also may wish to steer clear of those with significant minority ownership by sanctioned individuals.

Additionally, ISINs are added for all debt issues, as well as for all new equity issues, for the entities sanctioned under OFAC Executive Order 13808 or any companies owned or controlled by these sanctioned subjects, where these are available through publicly available open sources and are not subject to licence restrictions.

When completing SOR research we not only strive to ensure that our data is as complete and up to date as possible but that coverage of new sanctions is completed as quickly as possible.

APRIL 6TH RUSSIAN OFAC SANCTIONS
SOR IN REAL TIME





RESEARCH TEAM AND SOURCES

Dow Jones Risk & Compliance employs a global team of researchers. Our team includes hundreds of research analysts based in Dow Jones offices in the Americas, Europe and Asia, who specialize in coverage of particular areas, including sanctions, politically exposed persons, adverse media and company ownership structures. We see the in-house research team as one of our key assets.

Research excellence impacts data quality in two ways:

- Subject matter expertise (whether related to countries, sanction lists, political or corporate structures) allows researchers to identify, authenticate and consolidate disparate pieces of information about the same individual or entity in order to ascertain what is relevant.
- Broad expertise in languages provides access to information sourced locally in the original language, which is more likely to be accurate, complete and up-to-date. Collectively the Dow Jones Research team is fluent in approximately 60 languages including those languages valued most by our clients: Chinese, Russian and Farsi.

One key advantage Dow Jones researchers have is the ability to leverage Factiva, the Dow Jones archive of nearly 33,000 sources in 28 languages. More than 1 million articles from these reputable sources are added to Factiva daily, many of which are otherwise accessible only via paid subscription. In some cases, the archive goes back more than 40 years.

Information contained in Factiva articles is used to create and enrich Risk & Compliance profiles, particularly the adverse media profiles. Sources also include government and other official websites. The research team also maintains data for over 1,200 List References (Sanctions Lists, Other Official Lists, Other Exclusion Lists) sourced from over 400 list-issuing bodies (i.e. sanctions, official regulators, financial intelligence units, law enforcement bodies, supervisory authorities etc) using a thorough data collection, management and transfer methodology.

For all our content sets, we cast a wide net to find the data that our clients need, whatever the language, and also focus on the most relevant data to save our clients time.

Risk & Compliance is innovating with the use of automation to augment the research team's data discovery and quality assurance efforts. Dow Jones considers artificial intelligence (AI) and machine learning (ML) fundamental priorities, critical to the company's growth. One area of investment involves developing and refining large scale data analysis techniques for Risk & Compliance to identify and retrieve relevant issues for coverage.

We use AI and ML tools to augment the abilities of our research analysts by examining hundreds of thousands of multilingual articles processed in any day, eliminating articles that are irrelevant and capturing and structuring the data needed to associate and classify the event, person and/or entity. This allows our researchers to focus on ensuring the most accurate, timely and complete data possible is being passed to our customers.

In addition, the expertise of our in-house team enables us to maintain rigorously defined coverage parameters, so our clients receive consistent, valid information for each of our coverage areas.



QUALITY ASSURANCE

The Dow Jones Risk & Compliance Data Quality Assurance program covers four factors: **accuracy**, **completeness**, **validity** and **timeliness**. Dow Jones aims to ensure consistent quality across all of our content sets.

QUALITY ASSURANCE: FOUR FACTORS, THREE LAYERS AND REVIEW

To measure the four key quality factors (accuracy, completeness, validity and timeliness), the Risk & Compliance teams use a three-layered approach as well as an overall assessment of the quality program.

The three layers of quality assurance are:

- Controls carried out by the research team.
- Checks carried out by the R&C Quality Assurance team as part of a profile quality monitoring program.
- Quality checks carried out across the entire database by a third team that looks at the integrity of Risk & Compliance data overall.

The Research team's checks cover data at the input stage and post processing to minimize the risk of errors or a mismatch in coverage, categorization or linking to other profiles.

The Quality Assurance team conducts regular internal audits of data for each category. Scoring methods include industry standard precision and recall. This is applied to the audited data and the results are fed back on an individual and team basis as part of a quality cycle.

The Data Integrity team assesses quality via hundreds of automatic quality checks performed on a regular basis covering all content sets included in Risk & Compliance.

Lastly, the Quality Assurance program itself is the subject of review to ensure continuous improvement. As part of our reviews, we have enhanced some of the automated components of our QA program. The combination of automation and Research team expertise has boosted the effectiveness of our quality checks and risk database quality overall.

MONITORING FOR ACCURACY

The Quality Assurance team samples a portion of new and changed profiles to maintain high levels of data precision. Each field within a sampled record is checked against publicly available information and given two scores: a Precision score denoting the accuracy of the content within a profile, and a Recall score denoting the completeness of the data within a profile.

Average Precision for the 12 months to October 2018 was maintained at 99.48% -- a very high level.

In addition, almost 500 quality checks are performed as part of the accuracy assurance process on new and existing Dow Jones profiles.

Dow Jones also engages a third party to conduct an annual sanctions data reconciliation exercise. This involves comparing the data on a number of official sanctions lists with the data stored in the Dow Jones sanctions database. The report's key finding was an accuracy rate of 99.99% when comparing Dow Jones name and alias data to eight significant sanctions lists. A copy of the report is available upon request.

ACCURACY: UNDERPINNED BY PROCESS



MONITORING FOR COMPLETENESS AND VALIDITY

The Dow Jones team monitors data for completeness in several ways. As mentioned, a Recall score is calculated, and the average score over the 12 months to October 2018 was 99.01%. [The Precision and Recall ratios should also be seen in the context of the growth in size of the Risk & Compliance database. The number of profiles in the database grew by nearly 13% in the same period]. In addition, we perform regular sampling activities, checking for relevant news articles in Factiva.com and the internet, then cross-checking to ensure profiles exist on the Risk & Compliance database for particular categories.

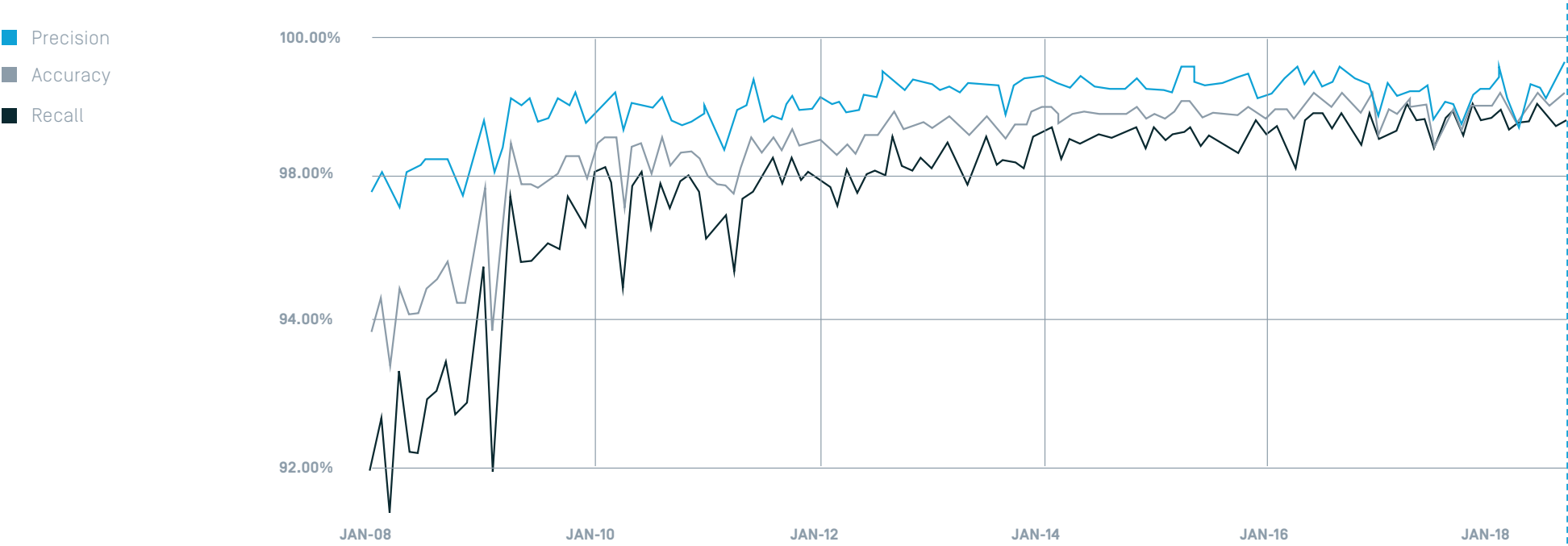
As part of Precision and Recall monitoring, incorrect items are corrected and if an error/omission spotlights a potential issue, the Quality team will include systematic checks in our quality cycle to ensure the issue does not reoccur.

The Dow Jones team also looks at completeness as part of the bigger picture of validity. Constructing and maintaining a comprehensive, consolidated and actionable database of individuals and entities of interest is not simply a case of repackaging primary source information. Tenacious research is required to complete profiles and reduce the likelihood of false positives during screening.

In addition to the audits by the dedicated Quality Assurance team, Dow Jones builds in quality assurance as part of all research team workflows. These include quality efforts at time of input, system validations, proofing processes, field level surveying -- in short, structured and consistent data quality checks.

The graph below shows the Precision and Recall trends for quality monitoring across record types since January 2008, and the averaged 'accuracy' figure. We have seen a continued rise in both areas of Precision and Recall throughout the reporting period, primarily attributed to significant improvements in our quality processes, fine-tuning of our monitoring system, and the expansion of our global Research team.

PRECISION, RECALL, AND ACCURACY



TIMELINESS

Data can be accurate, complete and valid, but unless it is timely the value is severely reduced as lengthy time lags result in increased exposure to regulatory, commercial and reputational risk.

Timeliness targets are included in research team performance objectives for each Risk & Compliance data set. Whether the content covers PEP updates from national or regional elections, ownership information associated with newly-sanctioned subjects from OFAC or the EU or updated Sanctions Lists, the appropriate timeliness targets are reviewed and monitored.

Access to Risk & Compliance data is an important component of timeliness. Clients have a choice of how they access Dow Jones data and the frequency of updates they require.

- Risk data, which includes sanctions data, accessed via the RiskCenter or API is continually updated
- Risk data accessed via feed delivery is updated every 24 hours via the download of an XML or CSV feed. The premium Sanction Alert feed provides updates up to six times a day (every four hours.) This is an enhancement introduced in 2018, based on customer feedback, from the previous Sanctions Alert frequency of up to three times a day. The improved frequency, where subscribers can choose interval windows as narrow as four hours, minimizes the chance that a firm's counterparty has sanctions listings that the firm does not know about, and can make the difference in ensuring a prohibited transaction does not leave the organization.

SANCTIONS TIMELINESS: A MATTER OF URGENCY

The timeliness of Sanctions data is imperative. Over the last 12 months, since October 2017, Dow Jones has completed its processing of all regular sanctions updates issued on the following lists within one business day of publication or of taking effect:

- OFAC Specially Designated Nationals List (SDN)
- EU restrictive measures published in the EU Official Journal
- UN ISIL (Da'esh) & Al-Qaida Sanctions List
- UN 1988 Sanctions List (Taliban/Afghanistan)

The table below indicates the total number of profiles updated and the monthly update timeliness for the above OFAC, EU and UN sanctions lists for the last 12 months.

MONTH-YEAR	ADDITIONS	REMOVALS	CHANGES	TOTAL DELTAS	# OF DELTAS COMPLETED WITHIN 24 HOURS MON-SAT	%OF DELTAS COMPLETED WITHIN 24 HOURS MON-SAT
OCT-17	91	193	38	322	322	100
NOV-17	67	2	5	74	74	100
DEC-17	83	11	17	111	111	100
JAN-18	192	6	33	231	231	100
FEB-18	161	26	29	216	216	100
MAR-18	85	16	128	229	229	100
APR-18	127	3	60	190	190	100
MAY-18	196	4	97	297	297	100
JUN-18	97	5	28	130	130	100
JUL-18	37	9	21	67	67	100
AUG-18	44	1	20	65	65	100
SEP-18	36	6	57	57	57	100
TOTAL	1216	282	533	1989	1989	100

The graph below shows the breakdown of monthly updates for OFAC, EU and UN sanctions lists.

Occasionally, governments release additions, changes and deletions to their sanctions lists on the same day that fall outside the boundaries of normal business. Processing these irregular updates can take additional time, but the Dow Jones team prioritizes research activities to make the updates as quickly as possible. For example, on 21 December 2017, OFAC created a new program under the Global Magnitsky Human Rights Accountability Act with over 50 profiles. Despite the fact that this was a new OFAC list, requiring a new Dow Jones List Reference to assist with filtering, the Dow Jones Sanctions team processed all the new profiles within a few hours.

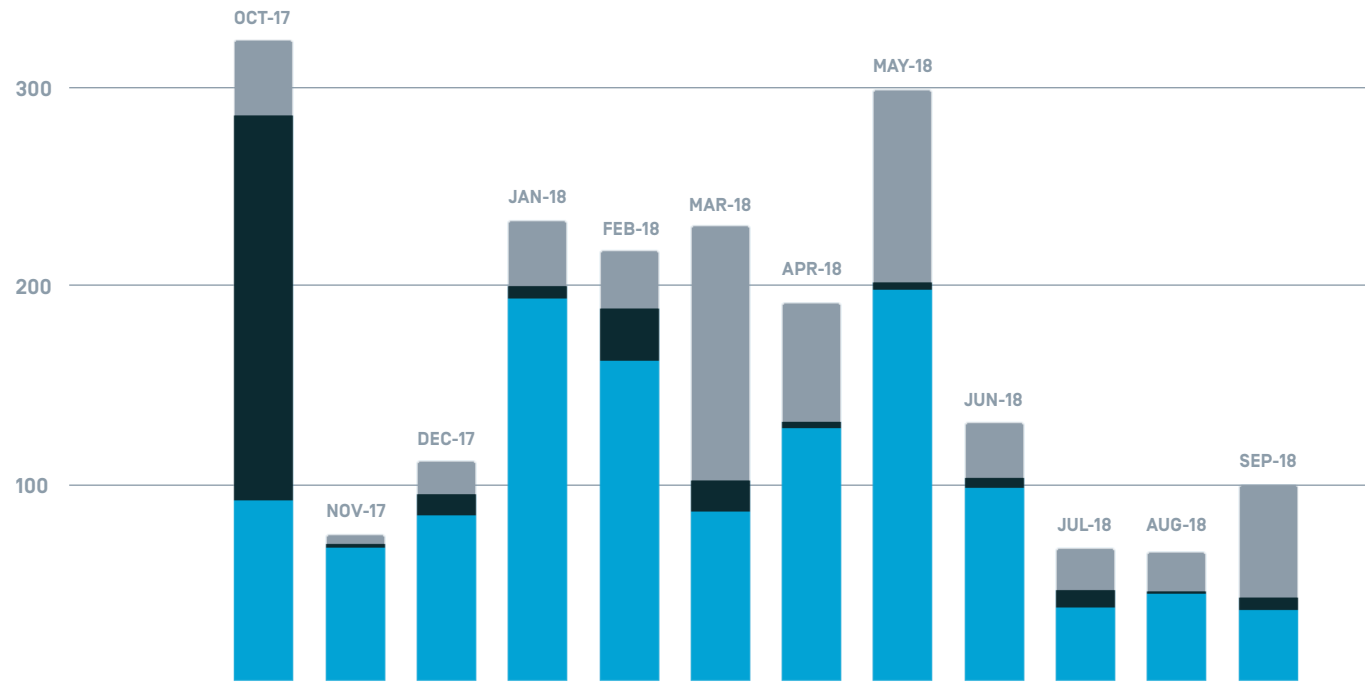
As shown in the chart, the number of updates to Sanctions data profiles can vary dramatically from day to day and month to month. The spike in the number of updates in October, 2017 is due to the fact that OFAC's Sudan program was terminated. As a result, 157 profiles were removed from OFAC - Specially Designated National List.

Another notable spike occurred in May, 2018. OFAC designated 31 aircraft and entities associated with Mahan Air for being suspected of playing "a critical role in exporting the Iranian regime's malign influence". According to OFAC's Press Release, Mahan Air has ferried IRGC-QF operatives, weapons, equipment, and funds to international locations in furtherance of Iranian state-sponsored terror operations.

Achieving the target of updating our lists in one business day is a testament to the dedication and skill of our research staff and their ability to work around the processing challenges imposed by the update format of some official lists.

SANCTIONS DATA RECORDS

■ Changes ■ Removals ■ Additions



SYSTEM RELIABILITY

An important part of timeliness of data is system reliability. The corporate mission of Dow Jones is to meet and exceed the business needs and operational requirements of our customers.

Dow Jones takes product availability very seriously; availability calculations are based on the best practice models in the information technology industry, are measured daily and reported monthly to all technical and product management, the Dow Jones Leadership Team and the Board of Directors. The company has well-defined processes for the escalation, resolution, evaluation and tracking of incidents and a formal Capacity Planning Team responsible for ensuring optimal systems capacity and availability.

Employees of Dow Jones are customer-focused, with service to customers being of the highest importance. Clients are served and supported by local account teams present in more than 40 countries as well as a dedicated Risk & Compliance Specialist team, experts in the field. Clients also receive the full support of Dow Jones Global Customer Service, which provides customer service and technical assistance and is available 24/7 by telephone, email and chat. The Support area on RiskCenter provides Customer Service links and information.

LISTS COVERAGE: A GROWTH STORY

One area where our dialogue and responsiveness to client needs is most obvious is in our Sanctions, Other Official and Other Exclusion Lists coverage. Requests from clients have resulted in the expansion of the content covered, requiring investments in Research Team resources and automated tools to research and maintain the data.

Lists were added to the risk database in 2002, and since then new sanctions and other official lists and exclusion lists have been added every year. The extent of the archive varies per list.

In the last 12 months, since October 2017, 16 new Sanctions and Other Official list references have been added for lists originating in nine countries - Colombia, Taiwan, Peru, Panama, Qatar, U.S., China, Jersey and

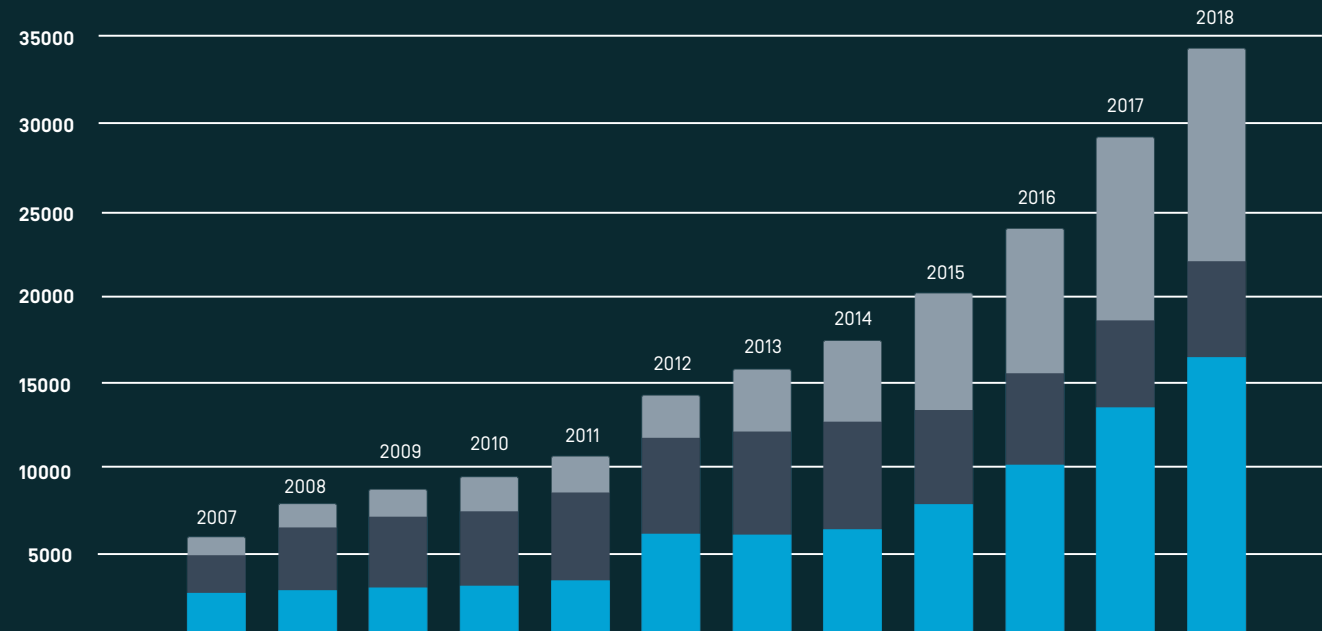
India. Additionally two new lists from World Bank and European Union were added. All these additions were a result of requests from our clients or regulatory changes.

As the number of lists has grown, the number of profiles has increased in tandem.

Details of the lists covered and the Lists References used to identify the various lists within the database, can be found [here](#) and we recommend clients subscribe to this FAQ via the Support area on RiskCenter. New lists can be requested via FAQ "[How do I request the addition of a new sanctions/official list to Dow Jones Risk & Compliance?](#)". The Research Team responds to such new list requests by determining the suitability of the list for inclusion in terms of content, format and update frequency and then prioritizes adding any content based on resources required and value to clients.

SANCTIONS DATA RECORDS

■ Inactive Total ■ Active Entities ■ Active People



CONTINUOUS IMPROVEMENT

Dow Jones is aware the data requirements of our clients are not static as business requirements and regulatory expectations change. The growth in the content sets covered by Dow Jones and the changes within content sets reflect our understanding of the changing climate and risk appetites. We welcome dialogue and partnership with our clients to shape our content and delivery.

In addition to the content enhancements mentioned above, Dow Jones is continually innovating to provide solutions that deliver our content when and where our clients need it. Our online RiskCenter products, Data Feed services, API and RiskReports enhanced due diligence services offer many delivery options.

A partial list of recent product enhancements we've made to better meet the needs of our clients:

- **Profile Update History:** Subscribers can view recent updates to the profiles in RiskCenter, allowing them to determine whether the change is material and perform further due diligence in an efficient manner.
- **Batch Screening:** Users can benefit from enhanced export capability, additional filters to assist with reporting, and better reporting on when screening last occurred, providing clearer reassurance from an audit perspective.
- **Sanctions Alert Feed:** Customers can now choose to get the Sanction Alert feed updates every four hours instead of every eight hours to stay on top of the updates related to Sanctions.

In addition to dialogue with clients and the enhancements made in response to client needs, Dow Jones strives to keep subscribers informed on content and product changes. We communicate enhancements to Risk & Compliance content and products via a quarterly Product Update. A link to the Update is emailed to clients and also is available on the Support area of RiskCenter, along with an archive of previous Updates, available in nine languages. Additional monthly Product Updates are provided as needed.

Dow Jones Risk & Compliance thanks you for your business and extends our commitment that we will provide the best data to cover the risks that concern you the most. Should you have any suggestions or questions about Risk & Compliance, please contact us via email at service@dowjones.com.

Dow Jones engages a third party on an annual basis to undertake the ISAE 3000 Reasonable Assurance Report on the Dow Jones Sanctions Platform and Data Set. The ISAE 3000 is a widely recognized standard used by accounting firms to independently assess Management's assertion on the design and implementation of effective controls.

Dow Jones is proud to share a copy of the ISAE 3000 report upon request.