

DOW JONES AND COMPANY, INC.

2019 Data Quality Report

Experienced, global team of multilingual researchers combined with innovative automation

OUR RESEARCH TEAM & SOURCES [PG.10]



500 quality checks per month on new and existing profiles

DATA ACCURACY [PG.12]



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

TIMELINESS [PG.14]



LETTER FROM GUY HARRISON

Welcome to the 2019 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 clear communication about our data quality 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 programs in the areas of Financial Crime Compliance, Third-Party Risk Management, Sanctions Compliance and Trade Compliance.

Data quality sits at the heart of Dow Jones Risk & Compliance. This has never been more important to us and to our clients, as new technologies are providing access to a wealth of new sources and information, not all of which are as reliable or as trustworthy as the market demands. We will endeavor to make sure that our data meets the most rigorous quality standards. Investment in quality data is imperative to running not only an effective compliance program but doing so at a sustainable cost.

Dow Jones will continue to support our clients with their risk-management programs, building on our unique access to global media and multilingual 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:

- **Growth of Sanctions Ownership Content** - in response to an increasingly active sanctions environment, including the OFAC and EU 50% rules, Dow Jones now covers 40 sanctions programs including more than 20,000 entities and bank branches, 1,500 of which were added over the past year.
- **Additional lists** - content coming under the Sanctions and Other Official Lists data sets
- **Expanded Trade Compliance data** - Dual-use Goods data is bundled with other datasets (vessels, sanctions and others) in ExImCheck, released by Dow Jones in 2018.

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 handwritten signature in black ink, appearing to read 'Guy Harrison'.

Guy Harrison

Managing Director

Dow Jones Risk & Compliance

September 30, 2019

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 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 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 means that customers can rely on receiving the data 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 primary source data 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.

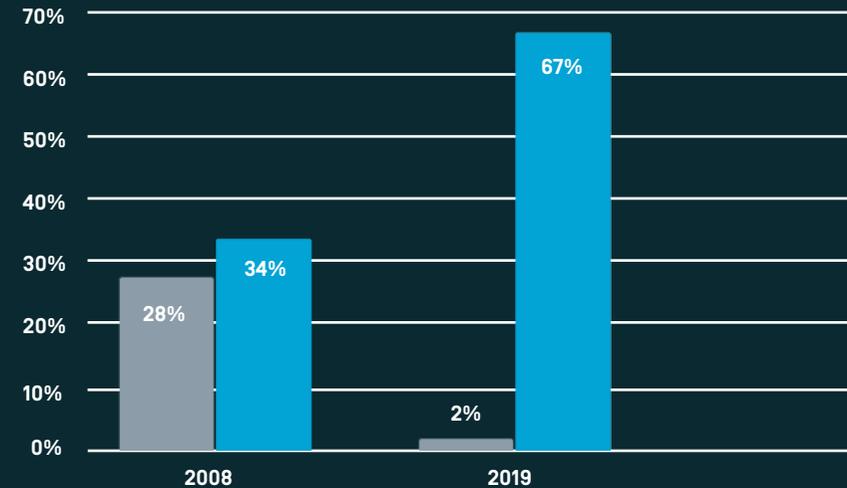
In addition, Dow Jones continually conducts quality assurance using a range of monitoring methods. This leads to long-term quality improvements in areas such as secondary identifiers. For example, the percentage of Risk & Compliance profiles with no secondary identifiers now stands at just 2% compared with 28% in 2008 against a background of a continuously expanding volume of profiles. 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.

Since 2008, the number of profiles has increased from 530,000 to 2.9 million in August 2019, up from 2.7 million in July 2018. 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 customer feedback.

As an illustration of the impact this improvement has had on the data, the ratio of Politically Exposed Persons (PEP*) with a date of birth has risen to 63% of 571,000 profiles as of August 2019. Over the course of the year to August 2019, the date of birth ratio has remained steady at 63% while the number of PEP profiles increased by 36,000.

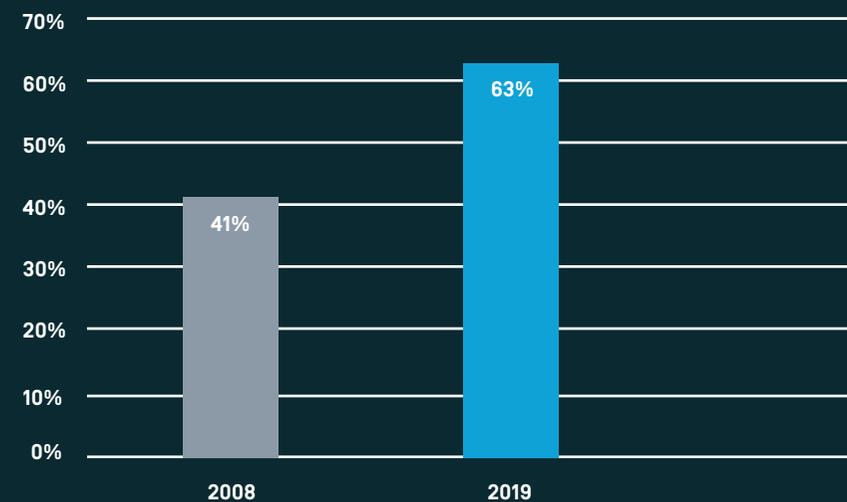
% OF RISK & COMPLIANCE PROFILES WITH MULTIPLE SECONDARY IDENTIFIERS

■ 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 90 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.		✓
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 • Organized crime • Trafficking • Financial crime • Tax crime • Terror 	✓	
RELATIVES OF PEP	31 categories of family members	✓	
CLOSE ASSOCIATES OF PEP	11 categories of close associates	✓	

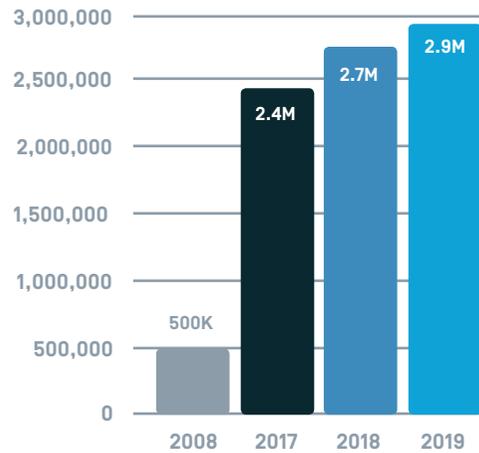
*As of August 2019.

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.]

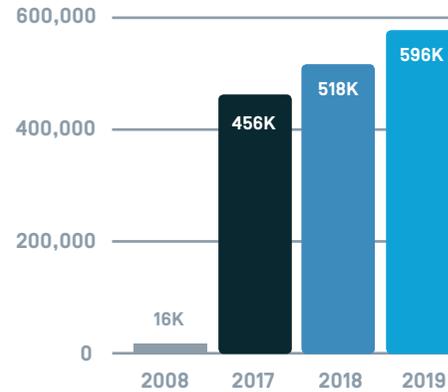
RISK CATEGORY	DESCRIPTION	COVERS PEOPLE	COVERS ENTITIES
STATE OWNED COMPANIES (SOC)			
GOVERNMENT OWNED OR CONTROLLED CORPORATIONS	Corporations owned by federal, regional or municipal governments in every country. The archive goes back to 2008.		✓
ADVERSE MEDIA ENTITIES (AME)			
ENTITIES WITH ADVERSE 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.		✓
SPECIALIST LISTS			
MARIJUANA-RELATED BUSINESSES	Licensed marijuana companies and their associated people and entities in the United States and Canada. Covers the 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 and goods codes used to describe dual-use goods and related information for use in trade compliance screening and related systems.		✓

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:

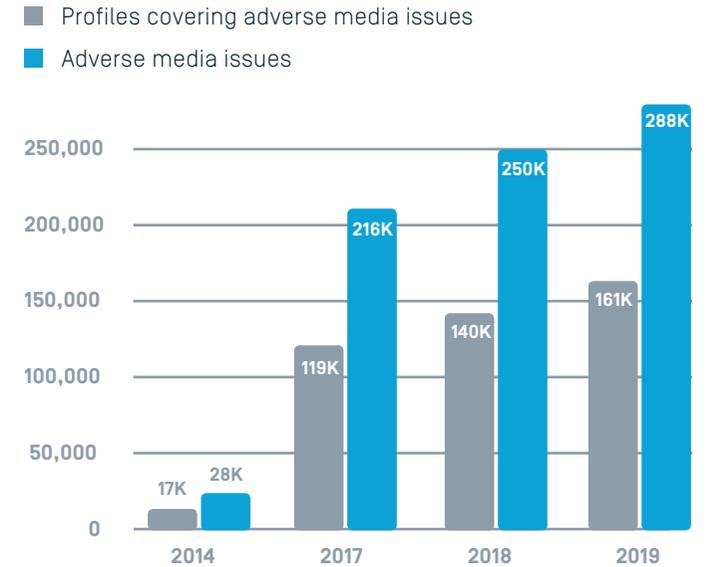
OVERALL RISK & COMPLIANCE GROWTH



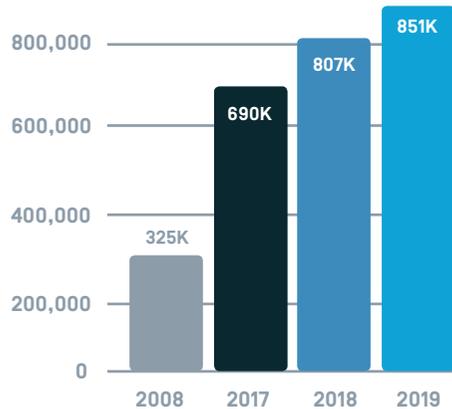
SPECIAL INTEREST PERSONS (SIP)



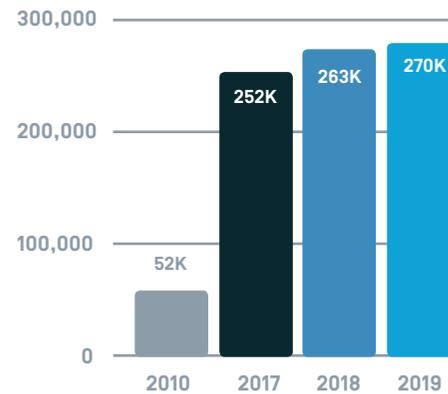
ADVERSE MEDIA ENTITIES (AME)



POLITICALLY EXPOSED PERSONS (PEP)



STATE OWNED COMPANIES (SOC)



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

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

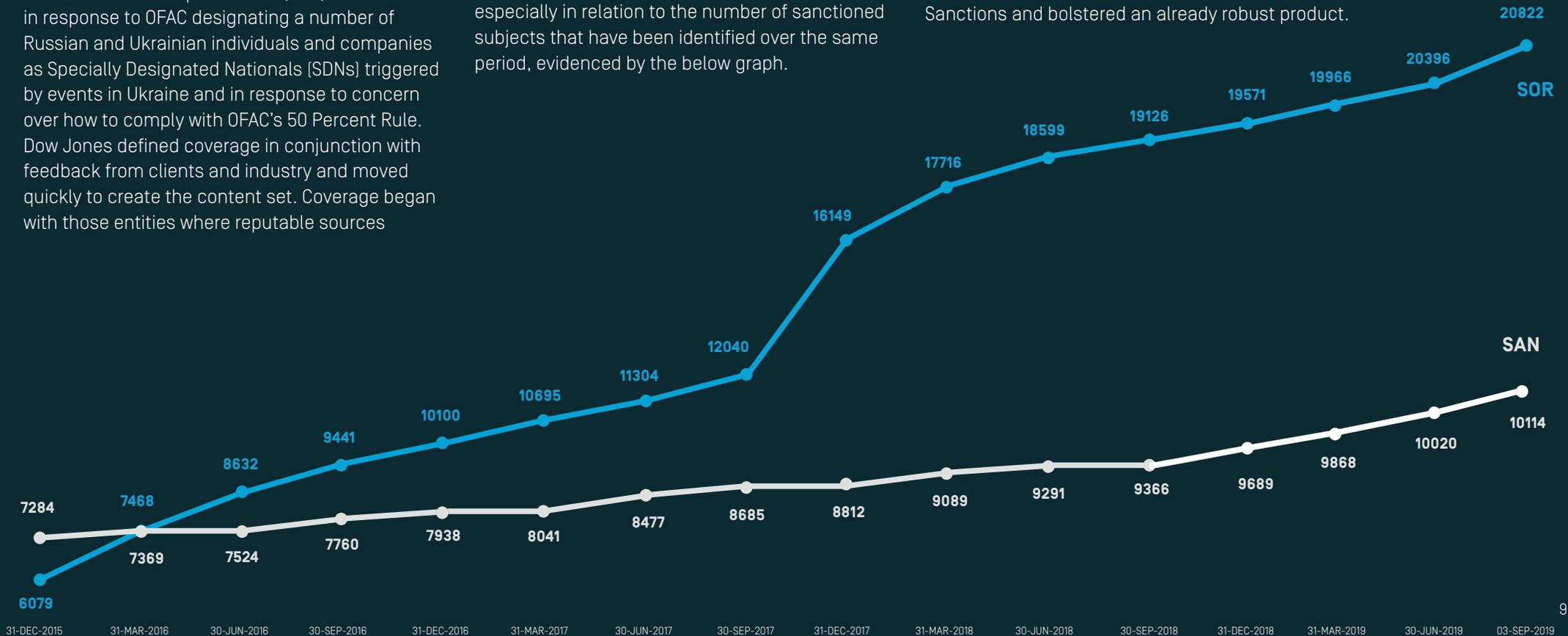
- Minimum ownership stake of 10%
- A sanctioned individual has a possible controlling interest (either as a member of the board or as a senior executive)

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 then the SOR content set 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 during the second quarter of 2017 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.





RESEARCH TEAM AND SOURCES

Dow Jones Risk & Compliance employs a global team of several hundred researchers, based in Dow Jones offices in the Americas, Europe and Asia. The researchers specialize in coverage of particular areas, including sanctions, politically exposed people, 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.

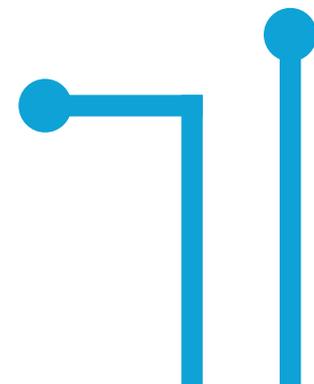
Information contained in Factiva articles is used to create and enrich Risk & Compliance profiles, particularly the adverse media profiles. Sources also include government and other official websites. The research team also maintains data for over 1,300 List References (Sanctions Lists, Other Official 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 researchers by examining hundreds of thousands of articles processed in any day, eliminating those 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 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 made up of controls carried out by the research team, those carried out by the Quality Assurance team as part of a profile quality monitoring program and 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 minimise 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 expanded and enhanced various automated components of our program. The combination of automation and research team expertise has boosted the effectiveness of our quality checks and Risk Database quality overall.

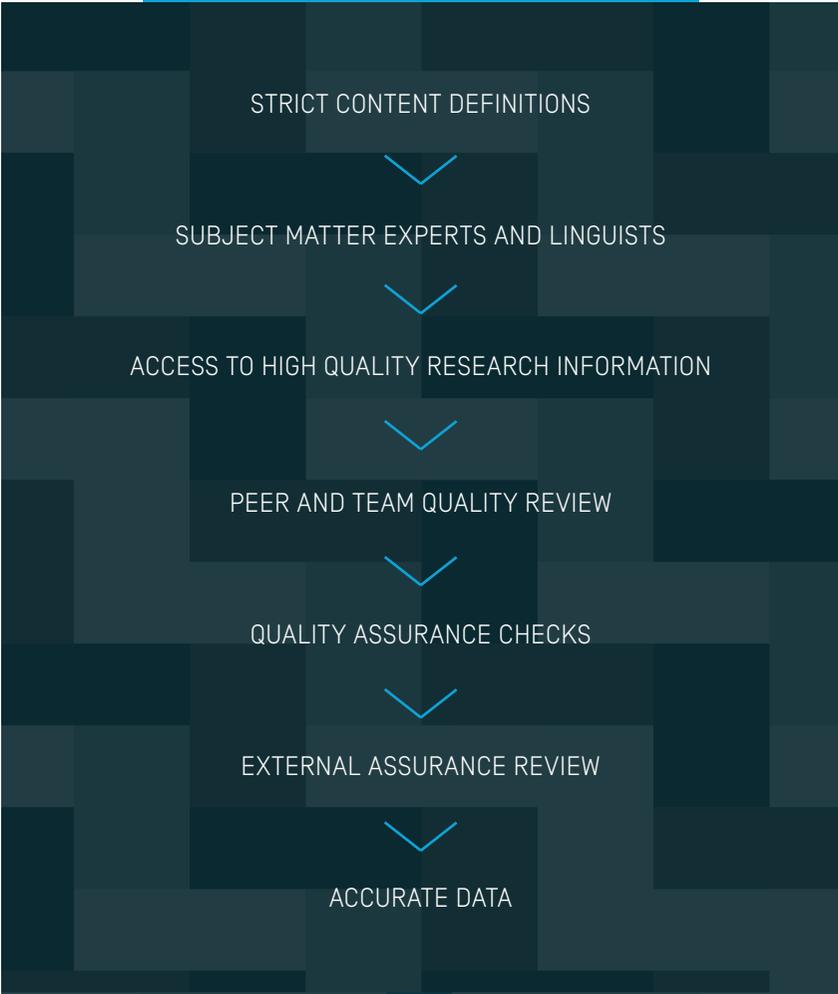
MONITORING FOR ACCURACY

The Quality Assurance team samples a portion of new and changed profiles to maintain high levels of data precision. Each field within a sampled profile 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 June 2019 was maintained at a very high 99.35%. 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. A Recall score is given, as mentioned, and the average score over the 12 months to June 2019 was 98.95%. (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 9% in the same period). In addition, we perform regular sampling activities, checking for relevant news articles in Factiva and the internet then cross-checking to ensure profiles exist on the Risk & Compliance database for particular categories.

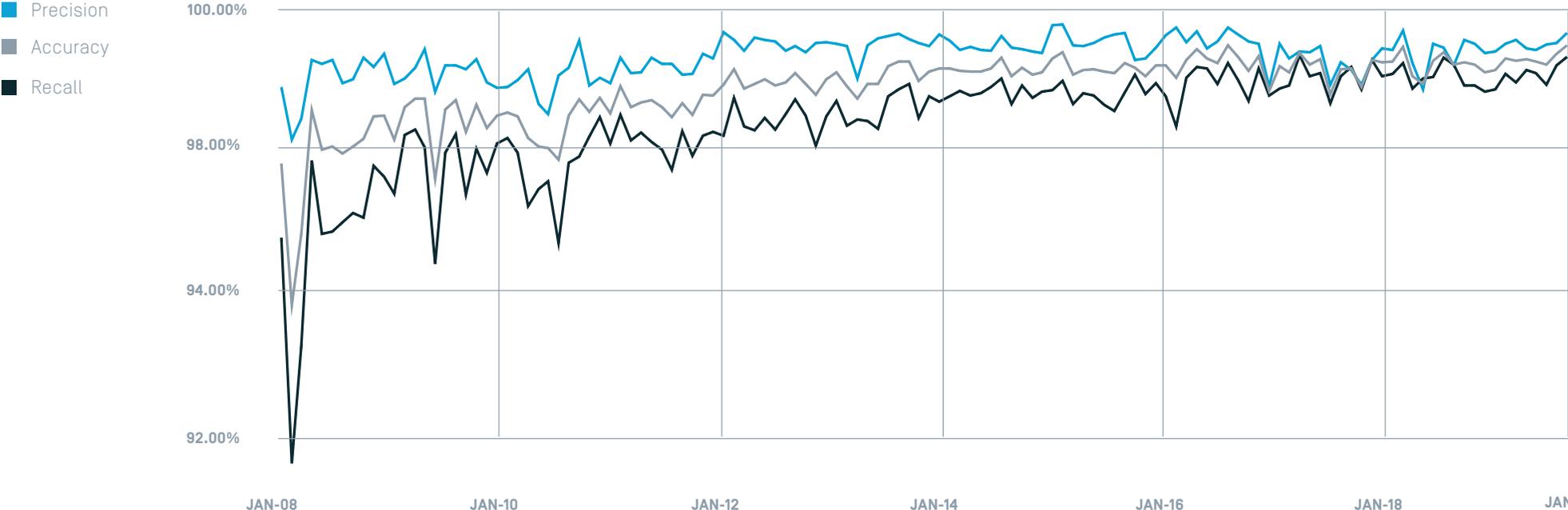
As part of Precision and Recall monitoring, incorrect items are corrected and if an error/omission spotlights a potential issue, the Quality Assurance team will include systematic checks in our quality cycle to ensure the issue does not reoccur.

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 profile types since January 2009, 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 can lead to 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 accessed via RiskCenter or API are available immediately
- Sanctions data available as part of the "Watchlist" feed is delivered every 24 hours via the download of an XML or CSV file. The premium Sanction Alert feed provides updates up to six times a day (up to 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 September 2018, Dow Jones has completed its processing of all regular sanctions updates issued on the following lists within one business day of publication:

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

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
SEP-18	37	9	96	142	142	100
OCT-18	87	11	502	613	613	100
NOV-18	73	7	33	122	122	100*
DEC-18	70	0	45	115	115	100
JAN-19	105	33	71	211	211	100
FEB-19	37	36	12	85	85	100
MAR-19	206	19	92	337	337	100
APR-19	80	73	108	271	271	100
MAY-19	62	35	193	307	307	100
JUNE-19	140	47	21	208	208	100
JUL-19	82	50	47	191	191	100
AUG-19	64	42	91	200	200	100
TOTAL	1043	362	1311	2802	2802	100

* 773 OFAC listings as a result of re-instatement of Iranian sanctions were excluded

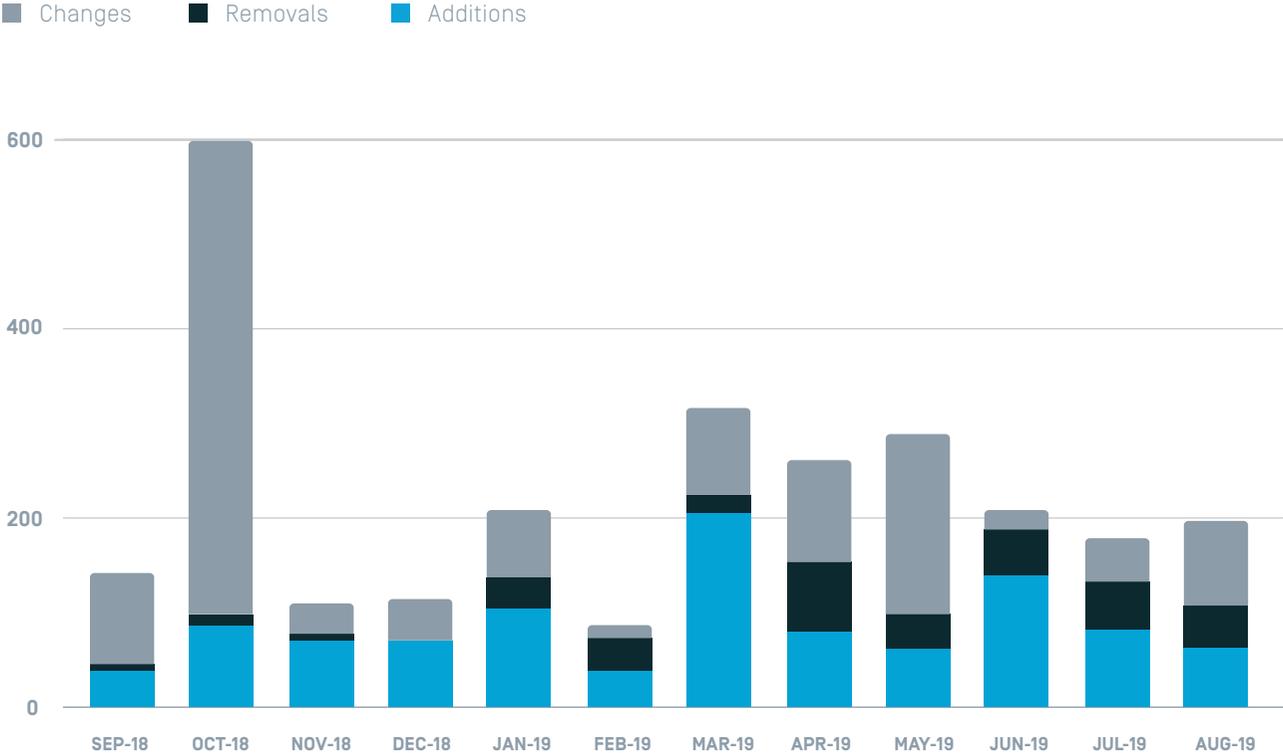
Occasionally, governments release additions, changes and deletions to their sanctions lists on the same day that fall outside the boundaries of normal business. Processing these irregular updates can take additional time, but the Dow Jones team prioritizes research activities to make the updates as quickly as possible. For example, following the U.S. withdrawal from the Joint Comprehensive Plan of Action (JCPOA), on November 5, 2018 OFAC deleted the Executive Order 13599 List and fully re-imposed sanctions on people and entities identified as meeting the definition of the terms “Government of Iran” or “Iranian financial institution” by adding them to the Specially Designated Nationals (SDN) list. This constituted the regulator’s largest ever single-day action targeting Iran; a total of 773 profiles for people, entities, financial institutions, vessels and aircraft were updated in just two working days. This volume of deltas equates to nearly as many changes processed in the preceding three months combined.

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 changes in October 2018 is due to the fact that OFAC made administrative changes to highlight the specific secondary sanctions risk associated with certain subjects on the SDN list. As a result, 371 SDN profiles were updated, and Dow Jones utilised the ID type ‘OFAC Additional Sanctions Information’ to capture this information in a structured way.

A notable spike in delistings occurred in April 2019. This is as a result of the UN removing subjects from their Iraq list and other regulators following suit. This means 66 of the total 73 changes made that month took place on 22 profiles, and each profile was updated three times in under two weeks.

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 PROFILES



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 and our Technology teams are responsible for ensuring optimal systems capacity and availability. The company has well-defined processes for the escalation, resolution, evaluation and tracking of incidents.

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 September 2018, twenty new Sanctions and Other Official list references have been added from eleven jurisdictions including Australia, Canada, China, New Zealand, Peru, Russia,

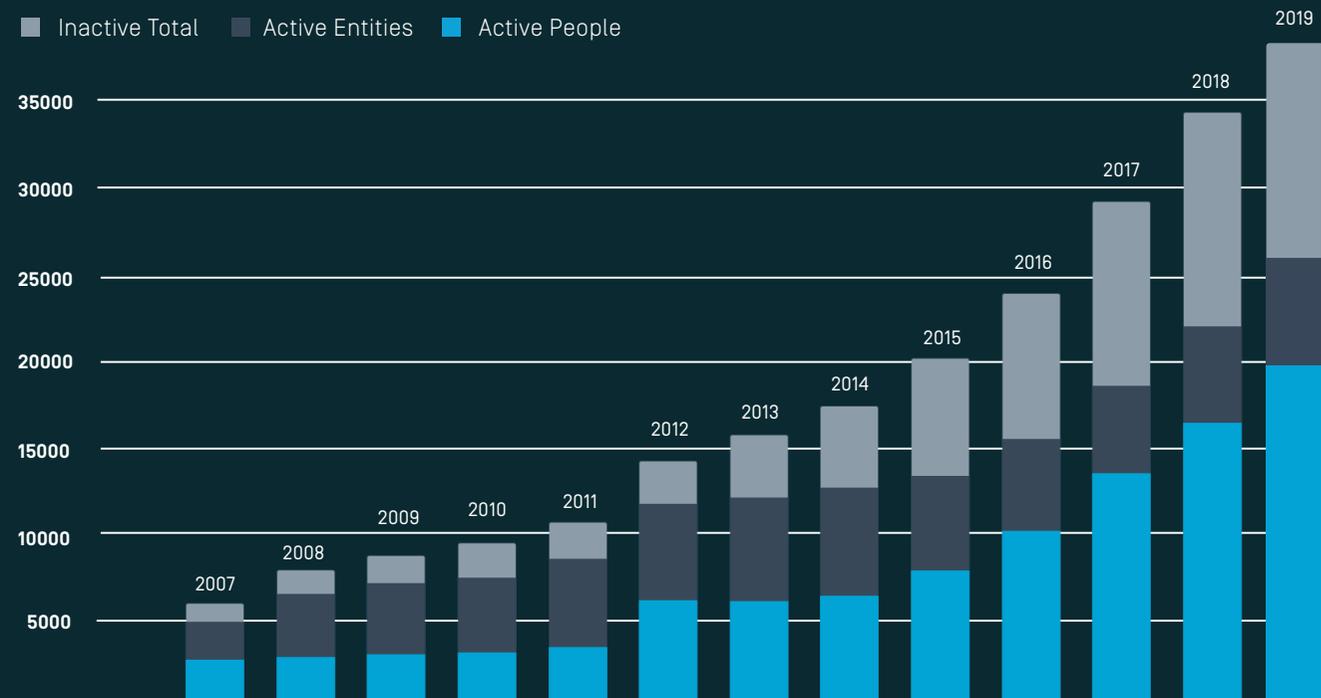
Taiwan, U.K., U.S., Vietnam as well as the African Development Bank Group and European Union. They were added as a result of requests from our clients or regulatory changes.

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 PROFILES

■ 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 delivery mechanisms 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:

- **Ultimate Beneficial Ownership (UBO):** Customers can choose to subscribe to UBO, a crucial part of the third-party onboarding process, helping our customers manage their financial crime risks such as Sanctions, Anti-Money Laundering and Know Your Customer. UBO profiles consist of a list of individuals and companies found to have ownership stakes according to in-country corporate registers. The data may include percentage ownership stakes, degree of separation from the original entity, and whether the owner is a beneficiary.
- **RiskCenter KYBP:** This is an end-to-end workflow for knowing your business partners. Customers may choose to subscribe to KYBP, which covers onboarding, risk assessment and risk level assignment, due diligence, risk mitigation and ongoing monitoring of third parties. It is offered as a stand-alone solution or as part of RiskCenter.

- **Trade Compliance:** Dow Jones has launched new offerings within the Trade Compliance portfolio such as ExImCheck and Vessel Tracking to help our customers comply with Trade Finance regulations.
- **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 appreciates 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, questions or concerns 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.