

Oracle Financial Services Customer Screening

Matching Guide

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Financial Services

Customer Screening Matching Guide

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Document Control

Table 1: Document Control

| Version Number | Revision Date | Change Log |
|----------------|---------------|----------------------------|
| 1.0 | July 2022 | Created the first version. |

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1 Introduction

Oracle Financial Services Customer Screening provides a flexible and customizable strategy for matching customer records to watch list records. **Sanctions screening** typically requires the business to employ tightly-defined, zero-tolerance matching policies that will identify every possible match against a sanctions list. In these cases, the additional review work of lower probability matches will be necessary. By contrast, a business carrying out **PEP screening** may choose a strategy of finding and investigating only the most likely matches against the PEP list, and the additional work required to confirm or eliminate weaker matches may not be cost-effective for the business.

Oracle Financial Services Customer Screening employs a range of clustering strategies and matching rules. These can be enabled and disabled as needed, to tune the behavior of Oracle Financial Services Customer Screening to your requirements.

The matching rules are built around name matching. Other identifiers are also used in the matching rules, but their main purpose is to rank matches by strength, and thereby to enable a most-likely approach to review potential matches. Oracle Financial Services Customer Screening also includes an evaluation of the risk posed by the potential match, allowing both strength of match and risk profile to be used in prioritizing reviews. For example, strong matches to Sanctions lists should be regarded as the most urgent matches, requiring immediate attention. Strong matches to PEP records will require follow-up, but may not be so urgent. Looser matches to PEP records may not be worth the time and operational cost of review.

In general, the looser the match rule, the more likely it is to raise false positives. It is not possible to eliminate all false positives, especially if there is a requirement to identify all true matches. Tuning the matching strategy is, therefore, a trade-off between the proportion of true matches that are not detected and the work required to manually eliminate false positives. This will be evident in the examples in this document.

1.1 General matching strategy

This section provides a brief description of the general strategy used in Oracle Financial Services Customer Screening. It consists of three main components: identifier preparation, clustering, and matching.

1.1.1 Identifier preparation

There are some differences between the structure of data sets that always need to be normalized before clustering and matching, so that the matching process does not need to repeat the configuration of transformations on each comparison.

Identifier preparation is used to ensure that the records conform to a pre-defined data structure which can be used by the rest of the matching process, and also to eliminate common forms of variance between the records (such as spelling variants of given names and abbreviations of frequently-used tokens).

1.1.2 Clustering

Clustering is used to minimize the work that must be performed by the final stage of matching. It works by splitting the working and reference data into wide tranches (clusters), based on similarities in significant data fields. Only subsets of the data which share similar characteristics, and will, therefore, be placed in the same cluster, will be compared on a record-by-record basis later in the matching process.

If very wide clusters are used, there will be a large number of records in each cluster. This means that there is a reduced risk that true matches will be missed, but also that a greater amount of processing power is required to compare all the clustered records by brute force. A tighter clustering strategy will result in smaller clusters, with fewer records per cluster. This results in reduced processing requirements for row-by-row comparisons but increases the likelihood that some true matches will not be detected.

1.1.3 Matching

Once the working and watch list records have been divided into clusters, the rows within each cluster are compared to one another according to the match rules defined for the matching processor. Each match rule defines a set of criteria, specified as comparisons, that the pair of records must satisfy in order to qualify as a match under that rule. The match rule also defines a decision to be applied to any records which satisfy the conditions of the rule. The majority of rules have a **Review** decision, meaning matches that hit the rule need to be reviewed. However, there are also elimination rules, where if the records being compared meet the rule's criteria, a **No Match** decision is reached and the two records will not be considered a match.

NOTE Oracle Financial Services Customer Screening does not use the **Match** decision as it never considers there to be an automatic match between two records that do not require review.

The rules are applied as a decision table, so if a pair of records qualifies as a match under a rule higher in the table, it will not be compared using any rules below that. All rules are configured to operate on a case-insensitive basis. Unless stated otherwise, all noise and whitespace characters are removed or normalized before matching.

1.2 Configuring Oracle Financial Services Customer Screening for different scenarios

As previously mentioned, Oracle Financial Services Customer Screening includes clusters and matching rules that are suited to various screening requirements. Tuning Oracle Financial Services Customer Screening to match your policies should be undertaken carefully and under the supervision of a risk and compliance expert, with knowledge of your business requirements and the relevant legislation.

The following general points may be useful when tuning the behavior of Oracle Financial Services Customer Screening:

- Some organizations use a zero-tolerance policy for individual name matches. Such a policy typically requires that all potential name matches must be manually reviewed, irrespective of the rest of the data associated with the record. If such a policy is in place, you should consider the following actions:
 - Disable all the elimination rules in the individual matching processors. If these rules are enabled, you run the risk of preventing close name matches from being detected by the remaining match rules.
 - Enable the conflict rules in the individual matching processors. These rules allow you to detect and manually review close name matches whose supporting information conflicts with the watch list records.

| | |
|------|---|
| NOTE | The conflict rules raise possible matches when the individual name appears to match a given watch list record, but the supporting data (such as date of birth or nationality) is in conflict. |
|------|---|

- If the name only clusters are enabled, the Name and Country and Name and YOB clusters are redundant and therefore can be disabled for PEP and EDD screening. They are disabled by default for Sanctions screening.
- Country prohibition screening is enabled by default for Sanctions screening. To screen for prohibited countries during PEP and EDD screening, enable the relevant country prohibition clusters and match rules:
 - The clusters used for country prohibitions in entity screening are the Registration Country cluster and the Operating Country cluster.
 - The match rules used for country prohibitions in entity screening are the Country Prohibition – Registration Country and the Country Prohibition – Operating Country match rules.
 - The clusters used for country prohibitions in individual screening are the Nationality Prohibition and the Residency Prohibition clusters.
 - The match rules used for country prohibitions in individual screening are the Country Prohibition – Nationality and the Country Prohibition – Residency match rules.
- In general, using a loose clustering strategy will result in relatively few clusters, each containing many records. This reduces the potential for missing true matches and increases the chance of false positives. It is also expensive in terms of processing requirements, as every record in the cluster must be directly compared with every other record in that cluster.
- Conversely, a tight clustering strategy will result in a relatively large number of clusters, each containing fewer records. This increases the potential for missing true matches and decreases the chance of false positives. It also reduces the overall cost of the processing requirements, as relatively few direct comparisons are required.

2 Chapter 2 Individual matching

This section details the default configuration when matching individuals to Sanctions, PEP and EDD lists.

2.1 Identifier preparation

The following identifiers are prepared for use in the individual matching process:

| Identifier Description | Standard prepared attribute name | Summary of preparation logic |
|------------------------|--|--|
| Given Names | dnGivenNames | A space-separated list of the first and middle names of the individual, after normalization (see the name normalization section, below). |
| Family Name | dnFamilyName | A normalized version of the family name (see the name normalization section, below). |
| Full Name | dnFullName | A concatenation of the given names and family name separated using spaces. |
| Original Script Name | dnOriginalScriptName | A whitespace normalized version of the original script name. |
| City | dnCity | A pipe-separated list of cities associated with the individual data. |
| Country Code | A space separated, deduplicated and sorted superset of all country codes provided in dnAddressCountryCode, dnResidencyCountryCode, dnNationalityCountryCodes and dnCountryOfBirthCode. | A space-separated list of standard 2-character country codes. |
| Date of Birth | dnDOB | A date attribute containing the date of birth of the individual. |

| | | |
|---------------|-------|--|
| Year of Birth | dnYOB | A string attribute containing a space-separated list of possible years of birth, in a four-digit format. |
|---------------|-------|--|

The following sections describe the data preparation strategy for each of these identifiers.

2.1.1 Name Normalization

The name identifiers map to the prepared attributes `dnGivenNames`, `dnFamilyName` and `dnFullName`. In all these fields, the following transformations are applied before matching:

- Standardization of accented characters.
- Replacement of non-alpha (A-Z or a-z) characters with spaces.

NOTE If matching data in the original language against original script names in watch lists, the appropriate character ranges should be removed from the Name Noise Characters Reference Data so that they are not replaced. If transliterating data before matching, transliteration must be done before the name normalization.

- Normalization of whitespace
- Conversion to upper case

The purpose of these transformations is not to create the most ‘correct’ name. For example, hyphens may be used in names in a number of ways, such as in a double-barreled surname, or as an alternative for a space when a surname has a qualifier (common in the World-Check data file).

In the former case, one might ideally want to preserve the hyphen, and in the latter case replace it with a space. In general, however, additional spaces in names will not cause names to miss matching, whereas different characters could.

Examples

| Input data | | Identifiers | | |
|------------|-----------|--------------|--------------|----------------------|
| Forename | Surname | dnGivenNames | dnFamilyName | dnFullName |
| Carmelo | Raschellà | CARMELO | RASCHELLA | CARMELO RASCHELLA |
| Darwen | MANN`A | DARWEN | MANN A | DARWEN |

| | | | | |
|-------------------------|------------|-------------------------|------------|------------------------------------|
| | | | | MANN A |
| Badr bin Saud bin Harib | AL-BUSAIDI | BADR BIN SAUD BIN HARIB | AL BUSAIDI | BADR BIN SAUD BIN HARIB AL BUSAIDI |
| A. Arnaldo G. | TAVEIRA | A ARNALDO G | TAVEIRA | A ARNALDO G TAVEIRA |
| Jose Mardônio | DA COSTA** | JOSE MARDONIO | DA COSTA | JOSE MARDONIO DA COSTA |

2.1.2 City and country identifiers

City and country values are derived from the source data wherever possible. There may be multiple possible cities or countries associated with an individual, perhaps because an individual resides in more than one country, has dual nationality, or resides in a different country from his/her nationality.

Country values are prepared as a space-separated list of two-character country codes in the `dnAllCountryCodes` attribute.

City values (which may contain spaces, for example, 'New York') are prepared as a pipe separated list of cities in the `dnCity` attribute.

2.1.3 Date of birth and Year of birth identifiers

A formal Date attribute holds the date of birth, where known. The year of birth is stored as a string and is either derived from the date of birth or may be derived from other data. The year of birth may include several possible years. This is most likely to occur when a reference source lists the age of individuals as of a given date, which may lead to two possible years of birth.

For example, if an individual is listed as 27 years old on 01/05/2007, the year of birth could either be 1980 (if born before 1st May) or 1979 (if born after 1st May). In this case, both possible years are derived and added to a list of possible years of birth. The year of birth comparison in matching looks for a common year of birth between the two records being compared.

2.2 Clustering

Oracle Financial Services Customer Screening provides eleven clusters for matching individuals to watch lists during Sanctions screening, and nine clusters for PEP and EDD screening:

| Cluster Method | SAN | PEP | EDD |
|----------------|-----|-----|-----|
|----------------|-----|-----|-----|

| | | | |
|-------------------------|---|-----|-----|
| Family Name | Y | N | N |
| Full Name Metaphone | Y | N | N |
| Given Names | Y | N | N |
| Full Name Trim | Y | N | N |
| Nationality Prohibition | Y | N/A | N/A |
| Residency Prohibition | Y | N/A | N/A |
| Name and Country | N | Y | Y |
| Name and YoB | N | Y | Y |
| First and Last Name | N | Y | Y |
| Original Script Name | N | N | N |
| First Initial Last Name | N | N | N |

NOTE

This table shows the default configuration of both Batch and RealTime screening processes, but these may be customized independently of one another.

The data used to create the clusters is created before matching by the preparation process. In all cases, the clusters use the prepared and normalized name attributes

`dnGivenNames`, `dnFamilyName`, `dnFullName`, and `dnOriginalScriptName`. For further information see Name Normalization.

2.2.1 Family Name Cluster (`dnClusterFamilyName`)

The Family Name cluster provides a backup to the full name clusters. This is especially important where the given name data is incomplete, making it difficult to form a complete cluster key for two names. For example, the following three example records do not share any Full Name cluster keys, due to the initials in the second record and the spacing and spelling variations seen throughout:

| dnFullName | Name tokens and trimmed values | | Cluster Keys | dnClusterFullNameTrim |
|---------------|--------------------------------|------------------------|-------------------------|-----------------------|
| STEPHEN NKOMO | JEQE | JEQ NKO STE | JEQNKO JEQSTE NKOSTE | JEQNKO JEQSTE NKOSTE |
| S J NKOMO | S NKOMO J | S NKO J | NKO | NKO |
| STEPHEN KOMO | JEKE N | JEK KOM N STE | JEKKOM JEKSTE KOMSTE | JEKKOM JEKSTE KOMSTE |

Clustering only on the family name circumvents this issue but results in large clusters and a concomitant increase in the processing required to cross-check all the records.

The **Family Name** cluster builder counters spacing and punctuation differences by generating **Metaphone** keys for all tokens of the family name, AND the whole of the family name after all white space is trimmed. This is to ensure that family names such as those in the last two records in the example table below are all clustered together despite the spacing differences.

The default logic of the cluster builder is as follows:

- Trim all white space from the normalized family name
- Apply the Metaphone transformation to the result, outputting a key with a length of up to 4 characters
- Strip common name qualifiers from the normalized family name, e.g. Abd, Al.
- Split the family name into several name tokens, using a space delimiter.

NOTE Many other punctuation and noise characters are normalized to spaces before generating the cluster. For further information see Name Normalization.

- Apply the **Metaphone** transformation to each name token, outputting a key with a length of up to 4 characters. If there were no tokens remaining after stripping common name qualifiers, then apply the Metaphone transformation to each name token of the original normalized family name.
- Concatenate all the generated **Metaphone** keys
- Deduplicate the list of keys

Example

| dnFamilyName | Tokens derived from dnFamilyName | Metaphone transformations | dnClusterFamilyName |
|----------------|----------------------------------|---------------------------|---------------------|
| ZHONG | ZHONG | JNK | JNK |
| XIAOJIAN | XIAOJIAN | SJN | SJN |
| ABACHE | ABACHE | APX | APX |
| ABANDA | ABANDA | APNT | APNT |
| ABD AL HAFIZ | HAFIZ ABDALHAFIZ | HFS APTL | HFS APTL |
| AL BUTHE | BUTHE ALBUTHE | PO ALPO | PO ALPO |
| AL | AL | AL | AL |
| SOLEIMAN HAMAD | SOLEIMAN HAMAD SOLEIMANHAMAD | SLMN HMT SLMN | SLMN HMT |
| GOODRIDGE | GOODRIDGE | KTRJ | KTRJ |
| GOODRICH SR | GOODRICH SR GOODRICHSR | KTRX SR KTRK | KTRX SR KTRK |
| NKOMO | NKOMO | NKM | NKM |
| N KOMO | N KOMO NKOMO | N KM NKM | N KM NKM |

2.2.2 Full Name Metaphone Pairs Cluster (dnClusterFullNameMeta)

The **Full Name Metaphone Pairs** cluster uses the normalized full name for the individual to generate a cluster key for every pair of names within the full name. The default logic of this is as follows:

- Split the normalized full name into several name tokens, using space as a delimiter.

NOTE Many other punctuation and noise characters are normalized to spaces before generating the cluster. For further information see Name Normalization.

- Sort the name tokens alphabetically.
- Apply the Metaphone transformation (the standard double-metaphone algorithm) to each name token, outputting a key with a length of up to three characters.
- Concatenate the Metaphone values, generating a final key value for each distinct pair of tokens.
- Deduplicate the list of keys.

Example

| dnFullName | Name tokens and Metaphone values | | Distinct Cluster Keys | dnClusterFullName Meta |
|--------------------------------|----------------------------------|------|--|---|
| XIAO JIAN ZHONG | JIAN | JN | JNS JNJNK SJNK | JNS JNJNK SJNK |
| | XIAO | S | | |
| | ZHONG | JNK | | |
| ZHONG XIAOJIAN | XIAOJIAN | SJN | SJNJNK | SJNJNK |
| | ZHONG | JNK | | |
| MOHAMMED SANI ABACHE | ABACHE | ABX | APXMHM APXSN MHMSN | APXMHM APXSN MHMSN |
| | MOHAMMED | MHMT | | |
| | SANI | SN | | |
| JOSEPH TSANGA ABANDA | ABANDA | APNT | APNJSF APNTSN JSFTSN | APNJSF APNTSN JSFTSN |
| | JOSEPH | JSF | | |
| | TSANGA | TSNK | | |
| ABD AL WAHAB ABD AL HAFIZ | ABD | APT | APTAPT APTAL APTHFS APTAHP ALAL ALHFS ALAHP HFSAHP | APTAPT APTAL APTHFS APT AHP ALAL ALHFS ALAHP HFSAHP |
| | ABD | APT | | |
| | AL | AL | | |
| | AL | AL | | |
| | HAFIZ | HFS | | |
| | WAHAB | AHP | | |
| SULIMAN HAMD SULEIMAN AL BUTHE | AL | AL | ALPO ALHMT ALSLM POHMT POSLM HMTSLM SLMSLM | ALPO ALHMT ALSLM POHMT POSLM HMTSLM SLMSLM |

| | | | | |
|----------------------------|-----------|-------|--|--|
| | BUTHE | PO | | |
| | HAMD | HMT | | |
| | SULEIMAN | SLMN | | |
| | SULIMAN | SLMN | | |
| AL BUTHE SOLEIMAN HAMAD | AL | AL | ALPO ALHMT ALSML POHMT POSLM HMTSLM | ALPO ALHMT ALS M POHMT POSLM HM TSLM |
| | BUTHE | PO | | |
| | HAMAD | HMT | | |
| | SOLEIMAN | SLMN | | |
| REGINALD B GOODRIDGE | B | P | KTRRJN Note: Initials are ignored by default when generating cluster keys | KTRRJN |
| | GOODRIDGE | KTRJ | | |
| | REGINALD | RJNLT | | |
| REGINALD B SR GOODRICH | B | P | KTRRJN KTRSR RJNSR Note: Initials are ignored by default when generating cluster keys | KTRRJN KTRSR RJ NSR |
| | GOODRIDGE | KTRJ | | |

| | | | | |
|------------------------|----------|-------|--|------------------------|
| | REGINALD | RJNLT | | |
| | SR | SR | | |
| STEPHEN JEQE NKOMO | JEQE | JK | JKNKM JKSTF NKMSTF | JKNKM JKSTF NK MSTF |
| | NKOMO | NKM | | |
| | STEPHEN | STFN | | |
| S J NKOMO | J | J | NKM Note: Initials are ignored by default when generating cluster keys | NKM |
| | NKOMO | NKM | | |
| | S | S | | |
| STEPHEN JEKE N KOMO | JEKE | JK | JKKM JKSTF KMSTF | JKKM JKSTF KMST F |
| | KOMO | KM | | |
| | N | N | | |

| | | | | |
|--|---------|------|--|--|
| | STEPHEN | STFN | | |
|--|---------|------|--|--|

2.2.3 Given Names Cluster (dnClusterGivenNames)

The **Given Names** cluster provides a further backup to the remaining clusters, especially to deal with cases where names are not necessarily well structured into family and given names.

NOTE Depending on the quality and culture of the name information, this cluster will often not be required. You can test the number of additional alerts identified by the cluster by running matching with this cluster disabled, and then running with it enabled. Comparing the new relationships against the old will highlight the relationships identified by using this cluster.

The default logic of the cluster builder is as follows:

- Split the normalized full name into several name tokens, using space as a delimiter.

NOTE Many other punctuation and noise characters are normalized to spaces before generating the cluster. For further information see Name Normalization.

- Standardize the normalized given names before clustering. This ensures that names such as 'William' and 'Bill' will be clustered together, although their raw Metaphone values are not the same. A space delimiter is used to split the name before standardizing.
- Apply the Metaphone transformation to the whole of the given names value after token standardization, outputting a key with a length of up to 4 characters.

Example

| dnFullName | Name tokens and trimmed values | | Cluster Keys | dnClusterFullNameTrim |
|--------------------|--------------------------------|-------------------|----------------------------|-----------------------------|
| XIAO JIAN ZHONG | JIAN XIAO ZHONG | JIA XIA ZHO | JIA XIA JIA ZHO XIA ZHO | JIA XIA JIA ZHO XIA ZHO |
| ZHONG XIAO JIAN | XIAO JIAN ZHONG | XIA ZHO | XIA ZHO | XIA ZHO |
| MOHAMMED | ABACHE | ABA | | ABAMO H ABASAN MOHSAN |

| | | | | |
|---|----------|-----|--|--|
| SANI ABACHE | MOHAMMED | MOH | ABAMOH ABASAN | |
| | SANI | SAN | MOHSAN | |
| JOSEPH TSANGA ABANDA | ABANDA | ABA | ABAJOS ABATSA JOSTSA | ABAJOS ABATSA JOSTSA |
| | JOSEPH | JOS | | |
| | TSANGA | TSA | | |
| ABD AL WAHAB ABD AL HAFIZ | ABD | ABD | ABDABD ABDAL ABDHAF ABDWAH ALAL ALHAF ALWAH HAFWAH | ABDABD ABDAL ABDHAF ABDWAH ALAL ALHAF ALWAH HAFWAH |
| | ABD | ABD | | |
| | AL | AL | | |
| | AL | AL | | |
| | HAFIZ | HAF | | |
| | WAHAB | WAH | | |
| | | | | |
| SULIMAN HAMD SULEIMAN AL BUTHE | AL | AL | ALBUT ALHAM ALSUL ALSUL BUTHAM BUTSUL HAMSUL SULSUL | ALBUT ALHAM ALSUL BUTHAM BUTSUL HAMSUL SULSUL |
| | BUTHE | BUT | | |
| | HAMD | HAM | | |
| | SULEIMAN | SUL | | |
| | SULIMAN | SUL | | |
| AL BUTHE SOLEIMAN HAMAD | AL | AL | ALBUT ALHAM ALSOL BUTHAM BUTSOL HAMSOL | ALBUT ALHAM ALSOL BUTHAM BUTSOL HAMSOL |
| | BUTHE | BUT | | |

| | | | | |
|---------------------------|-----------|-----|--|----------------------|
| | HAMAD | HAM | | |
| | SOLEIMAN | | | |
| REGINALD B GOODRIDGE | B | B | GOOREG Note: Initials are ignored by default when generating cluster keys | GOOREG |
| | GOODRIDGE | GOO | | |
| | REGINALD | REG | | |
| REGINALD B SR GOODRICH | B | B | GOOREG GOOSR REGSR | GOOREG GOOSR REGSR |
| | GOODRICH | GOO | | |
| | REGINALD | REG | | |
| | SR | SR | | |
| STEPHEN JEQE NKOMO | JEQE | JEQ | JEQNKO JEQSTE NKOSTE | JEQNKO JEQSTE NKOSTE |
| | NKOMO | NKO | | |
| | STEPHEN | STE | | |
| S J NKOMO | S | S | NKO Note: Initials are ignored by default when generating cluster keys | NKO |
| | NKOMO | NKO | | |
| | J | J | | |
| STEPHEN JEKE N KOMO | JEKE | JEK | JEKKOM JEKSTE KOMSTE Note: Initials are ignored | JEKKOM JEKSTE KOMSTE |

| | | | |
|--|--|---|--|
| | | by default when generating cluster keys | |
|--|--|---|--|

2.2.4 Nationality Prohibition (Nationality Code)

This cluster uses the space-delimited list of nationality country codes to generate cluster keys by generating an array of the component country codes.

2.2.5 Residency Prohibition (Residency Code)

This cluster uses the space-delimited list of residency country codes to generate cluster keys by generating an array of the component country codes.

2.2.6 Name and Country (dnClusterNameCountry)

The **Name and Country** cluster provides a backup using more detailed information about names and combining them with country information. The cluster is used to compare very similar names that are located over the same countries.

The default logic of the cluster builder is as follows:

- Split the normalized Full Name into name tokens, using space as a delimiter.

NOTE Many other punctuation and noise characters are normalized to spaces before generating the cluster. For further information see Name Normalization.

- Apply the **Metaphone** transformation to each name token, outputting a key with a length of up to twelve characters.
- Sort the **Metaphone** values alphabetically.
- For each country code associated with the record:
 - Concatenate the country code with the full set of **Metaphone** values, using an underscore as a separator.
 - If more than two **Metaphone** values are present, then iterate through all groups of **Metaphone** values which have exactly one value from the set missing, concatenating the country code onto the front of the **Metaphone** value set.
 - If the overall length of the `dnClusterNameCountry` field has exceeded 1000 characters, discard the last key and stop key generation.

Example

| dnFullName | Country Codes | Name tokens and Metaphone values | Cluster Keys | dnClusterNameCountry |
|------------|---------------|----------------------------------|--------------|----------------------|
|------------|---------------|----------------------------------|--------------|----------------------|

| | | | | | |
|-----------------------------|-------------|--------------|------|---|---|
| MOHAMMED SANI | ES GB | MOHA MMED | MHMT | ES_MHMT_SN GB_MHMT_SN | ES_MHMT_SN GB_MHMT_SN |
| | | SANI | SN | | |
| SULIMAN HAMD SULEIMAN | ES TH GB | HAMD | HMT | ES_HMT_SLMN_SLMN | ES_HMT_SLMN_SLMN ES_SLMN_SLMN ES_HMT_SLMN ES_HMT_SLMN TH_HMT_SLMN_SLM N TH_SLMN_SLMN TH_HMT_SLMN T H_HMT_SLMN GB_HMT_SLMN_SLMN GB_SLMN_SLMN GB_HMT_SLMN GB _HMT_SLMN |
| | | SULEI MAN | SLMN | ES_SLMN_SLMN ES_HMT_SLMN ES_HMT_SLMN | |
| | | SULIM AN | SLMN | TH_HMT_SLMN_SLMN TH_SLMN_SLMN TH_HMT_SLMN | |
| | | | | TH_HMT_SLMN GB_HMT_SLMN_SLMN GB_SLMN_SLMN GB_HMT_SLMN GB_HMT_SLMN | |

2.2.7 Name and YOB (dnClusterNameYOB)

The Name and YOB cluster provides a backup using more detailed information about names and initials combining them with years of birth.

The default logic of the cluster builder is as follows:

- Standardize dnGivenNames and dnFamilyName;
- Apply transliteration followed by the Metaphone transformation to the standardized given name, outputting a key with a length of up to four characters;
- Apply transliteration followed by the Metaphone transformation to the standardized family name, outputting a key with a length of up to four characters;
- Extract and uppercase the first letter of the standardized dnGivenName;
- Extract and uppercase the first letter of the standardized dnFamilyName;
- Extract the first two years of birth from dnYOB to generate two values (referred to as 'First YOB' and 'Second YOB' in the remainder of this example);
- Create up to four cluster keys by concatenating the following combinations of elements, using the underscore character:
 - First YOB + dnFamilyName (uppercased initial) + dnGivenNames (Metaphone).
 - First YOB + dnGivenNames (uppercased initial) + dnFamilyNames (Metaphone).
 - Second YOB + dnFamilyName (uppercased initial) + dnGivenNames (Metaphone).
 - Second YOB + dnGivenNames (uppercased initial) + dnFamilyNames (Metaphone).

NOTE

If any of the required data elements are missing, then the corresponding cluster key will not be generated.

- Deduplicate the list of keys.

Example

| dnGivenNames, dnFamilyName | dnYOB | Name tokens and Metaphone values | | Cluster Keys | dnClusterNameYOB |
|-------------------------------|----------------------|-------------------------------------|------|--|---|
| MOHAMMED, SANI | 1969 1970 1971 | MOHAMMED | MHMT | 1969_S_MHMT 1969_M_SN 1970_S_MHMT 1970_M_SN | 1969_S_MHMT 1969_M_SN 1970_S_MHMT 1970_M_SN |
| SULIMAN HAMD, SULEIMAN | 1980 1981 1982 | HAMD | HMT | 1980_S_SLMN 1981_S_SLMN | 1980_S_SLMN 1981_S_SLMN |
| | | SULEIMAN | SLMN | | |
| | | SULIMAN | SLMN | | |

2.2.8 First and Last Name (dnClusterFirstLast)

The First and Last Name cluster provides a tighter name only clustering method that relies on the first given name and last family name matching after standardization and allows for variation in any of the name tokens in-between.

The default logic of the cluster builder is as follows:

- Strip initials from the normalized given name and family name.
- Strip all common name qualifiers from the normalized given names and family name, e.g. Al, Bin, Von.
- Extract the first token from the stripped given names. If all tokens were stripped in steps 1 and 2, then extract the first token from the original normalized given names.
- Extract the last token from the stripped family name. If all tokens were stripped in steps 1 and 2, then extract the last token from the original normalized family name.
- Trim the extracted values to a maximum length of 4 characters.
- Sort the trimmed values alphabetically and concatenate to generate the final key value.

Examples

| dnGivenNames | dnFamilyName | Extracted Values | | dnClusterFirstLast |
|-----------------|----------------|------------------|----------|--------------------|
| OSVALDO ANTONIO | CASTELL VALDEZ | OSVALDO | VALDEZ | OSVAVALD |
| ABU MAHDI | AL MUHANDIS | MAHDI | MUHANDIS | MAHDMUHA |
| ABU | NIDAL | ABU | NIDAL | ABUNIDA |

| | | | | |
|-----|---------|---|---------|-------|
| V U | SHEIMAN | V | SHEIMAN | SHEIV |
|-----|---------|---|---------|-------|

2.2.9 Original Script Name (dnClusterOriginalScript)

The Original Script Name cluster provides a clustering method for matching names represented in non-Latin writing systems. The cluster builder generates a key for each token in the name.

NOTE A single cluster value of "Myanmar" is generated for original script names written in the Burmese alphabet irrespective of the name. This is needed because token splitting is not possible for the Myanmar writing system as it does not use a space character between words. As a result, all original script names in the Burmese script will be compared during matching. This should not cause performance issues during screening provided there are a low number of customer records using this writing system.

The default logic of the cluster builder is as follows:

- Split the original script name into several name tokens, using a space character as the delimiter.
- Trim each name token to a maximum of 5 characters.
- Concatenate all of the trimmed token values with a pipe separator.
- Deduplicate the list of keys.

Examples

| dnOriginalScriptName | dnClusterOriginalScript |
|-----------------------|-------------------------|
| Іван Антонович Шчурок | Іван Антон Шчуро |
| 林紹蕙 | 林 紹 蕙 |
| မြန်မာ | Myanmar |
| محمد محمد باقری | محمد باقر |

2.2.10 First Initial Last Name (dnClusterInitials)

The First Initial Last Name cluster provides a clustering method to group together names that share the same first name initial and last name and allows some variation for transposed names.

The default logic of the cluster builder is as follows:

- Split the normalized given names into several name tokens, using a space character as the delimiter.
- Split the normalized family name into several name tokens, using a space character as the delimiter.

- Generate the cluster key value as follows:
 - If there are two or more characters in the last token of the family name, then concatenate the first character of the given name with the last token of the family name.
 - If the last token of the family name is a single initial, then concatenate that character with the first token of the given name.
- Trim the cluster key to a maximum of 12 characters.

Examples

| dnGivenNames | dnFamilyName | dnClusterFirstLast |
|--------------|--------------|--------------------|
| MARTIN | JONES | MJONES |
| MARTIN PETER | JONES | MJONES |
| MARTIN | MORGAN JONES | MJONES |
| JONES | M | MJONES |

2.3 Matching

Oracle Financial Services Customer Screening uses different approaches to matching for different use cases. For Sanctions screening, a zero-tolerance approach to matching is assumed, where secondary data such as dates and years of birth, and nationalities cannot necessarily be assumed to be correct. In this case, it may be important to present matches where there is a level of name match even if other data would indicate that a match is unlikely. When screening against lists of Politically Exposed Persons (PEPs) or other individuals on watch lists (Enhanced Due Diligence matching), where the occasional 'false negative' may be tolerable from a business perspective, match rules are generally 'tighter' and demand at least one item of secondary data (such as a nationality, year of birth or date of birth) matches as well as a name of match. However, the screening rules for each screening process can, and should, be tailored according to the business appetite to risk. Oracle Financial Services Customer Screening also provides separate processes for Batch and Real-Time screening, as these may be subject to different matching strategies.

The following general notes describe the approach to matching:

- Matches are ranked according to how well the name matches. An exact name match rates as a match at the highest level, with the lowest level being represented by two loosely possible name matches with a different name structure. Further ranking is imposed by how well additional information (such as city or country information, and date of birth information) matches between the records.
- Oracle Financial Services Customer Screening allows for various levels of name match, including, but not limited to:

- Name variation recognition. This is carried out by name standardization. For example, all variations of Mohammed (Muhamad, Mohammad, Mohamed and so on) are substituted with 'Mohammed' when matching. This is particularly used for given names, though also applied when matching whole names. For example, more than 20 variations of the name 'Mohammed' are recognized and considered to be the same name.
 - Allowances for name abbreviation and initials. For example, 'Pete' is a possible match to 'Peter', and 'J' is a possible match to 'John'.
 - Allowances for typographical errors and transliteration differences. For example, 'Abdool' is a possible match to 'Abdul', even if the variants are not standardized.
 - Allowances for names being out of order or structured differently. For example, 'Mohammed Abbas Al-Tikriti' can be matched with 'Mohammed Al-Tikriti Abbas'.
 - Allowance for additional names. For example, 'Juan Carlos Ferreira' can be matched with 'Juan Ferreira'.
 - Allowance for names being split differently. For example, 'Xiao Jian' is a match to 'Xiaojian'.
- Oracle Financial Services Customer Screening attempts to prevent false positives by various means, including, but not limited to, the following methods:
 - Backing up typo tolerance with Metaphone matching. For example, 'Mary' and 'Mark' are not considered a match, although they are only one character different.
 - Backing up typo tolerance with consideration of the percentage of characters that are different. For example, the initials 'A' and 'E' are not considered a match, even though they are only one character different.
 - Considering the different significance and commonality of name tokens. For example, if name qualifiers such as 'Al' are shared between two Arabic names, this is not as significant as if an uncommon name such as 'Abbas' is shared.
 - It is advisable to configure the set of match rules that are activated. In particular, you may wish to activate or deactivate some of the lower match rules in the list, which lead to the weakest name matches. Factors affecting the usefulness of these rules include:
 - the policies of the organization;
 - the quality of the customer data; and
 - the provenance of the customer data.

For example, Asian and Arabic names may be subject to more typographical and name ordering issues than other names. Where the data contains many of these names, the lower strength rules may identify more possible matches. The organization may want to review some or all of these as a matter of policy, or it may consider the matches too weak to review.

The required rules are easily activated or deactivated as needed in Oracle Financial Services Customer Screening.

2.3.1 Match Rules

The following match rules are involved in Individual Screening:

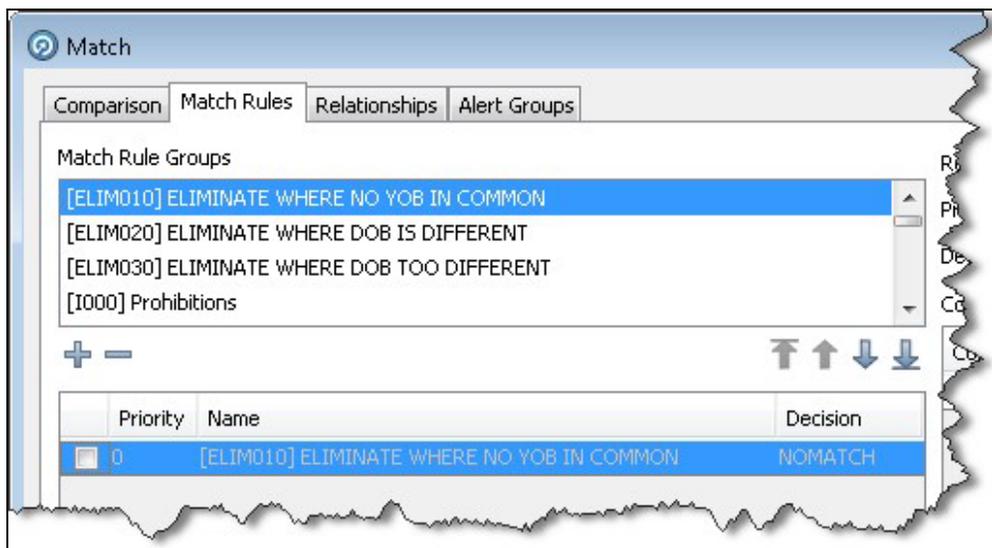
- The elimination rules. These are used in various positions in the rule templates to eliminate any records that have conflicting supporting data. The elimination rules may be moved up and down in order to change when they are applied during the matching process.
- The name matching rules. These are organized by the level of name match, with the strongest name matching rules placed at the top of the decision table.

NOTE

- Match rules are not ordered by strength across all identifiers. For example, a weaker name match that is strengthened by matches on date of birth, city, and country is likely to be a stronger overall match than a strong name with strongly contradictory data in the other fields.
- Oracle Financial Services Customer Screening includes many match rules for each level of name match, reflecting the match strength of any additional information, particularly date of birth and location data. The last rule in each set is a 'conflict' rule, and in many cases will be disabled by default. These rules allow records that fulfill the specified level of name match but have conflicting supporting data fields indicating that a true match is unlikely.

- The loose name matching rules. These are also based around name matching, but identify looser matches and are not enabled by default. These rules are likely to result in a large number of false-positive matches and are most likely to be of use when screening against sanctions lists, where it is important that no true matches are missed.

For the sake of clarity, match rules are divided into groups, as shown below:



As each group is selected, the match rules it contains are displayed in the window below.

The priority of the groups can be changed using the arrows below the Match Rules Group list. When a group is highlighted, you can:

- Click  to move it up one place on the list.
- Click  to move it down one place on the list.
- Click  to move it to the top of the list.
- Click  to move it to the bottom of the list.

The remainder of this section describes the matching rules that are present in Oracle Financial Services Customer Screening in greater detail.

2.3.2 Prohibition Rules

The Prohibition rules check for country information in an individual's record against the list of prohibited countries and nationalities maintained in List Management.

| Group Code | Matching Rule | Summary of Rule Logic |
|------------|-----------------------------------|--|
| I000A | Country prohibition - Residency | The country of residence given matches a prohibited country. |
| I000B | Country prohibition - Nationality | The nationality given matches a prohibited nationality. |

2.3.3 Elimination Rules

| Elimination Rule | Summary of Rule Logic | Enabled by default? |
|----------------------------------|---|---------------------|
| ELIMINATE WHERE NO YOB IN COMMON | This rule will eliminate pairs of records if both YOB fields are populated and there is no value in common. | Yes |
| ELIMINATE WHERE DOB IS DIFFERENT | This rule will eliminate pairs of records if both DOB fields are populated and there is no value in common. | No |

| | | |
|---|---|-----|
| ELIMINATE WHERE DOB TOO DIFFERENT | This rule will eliminate pairs of records if the date of birth differs too greatly between the two records. Pairs are eliminated if there are 6 or more years difference between DoBs, and one typographical error, and one typographical error in a month. | No |
| ELIMINATE WHERE GENDER IS DIFFERENT AND BOTH DERIVED OR BOTH STATED | This rule will eliminate pairs of records if the genders are different, and EITHER both records had the gender specified as part of the input record, OR both records have a gender value which was derived from other fields. | Yes |
| ELIMINATE WHERE NO COUNTRY SHARED AND ALL SAFE | This rule will eliminate pairs of records if there are no countries in common in the Country fields, AND if all countries listed are on the Safe list. The Safe list is maintained in the Match - Individual Safe Countries ISO Codes Reference Data. | Yes |
| ELIMINATE WHERE NO NATIONALITIES IN COMMON | This rule will eliminate pairs of records if the Nationality fields contain no common entries. | Yes |
| ELIMINATE WHERE LIST OCCUPATION IS SAFE | This rule will eliminate pairs of records if the List Occupation field contains only values in the Match - Safe Occupations Reference Data. | Yes |
| ELIMINATE WHERE CUSTOMER RISK SCORE BELOW THRESHOLD | This rule will eliminate pairs of records if the Customer Risk Score is below a threshold specified in the corresponding screening process. | No |
| ELIMINATE WHERE LIST RISK SCORE BELOW THRESHOLD | This rule will eliminate pairs of records if the List Risk Score is below a threshold specified in the corresponding screening process. | No |
| ELIMINATE WHERE LIST PEP RISK SCORE BELOW | This rule will eliminate pairs of records if the List PEP Risk Score is below a threshold specified in the corresponding screening process. | No |

| | | |
|-----------|--|--|
| THRESHOLD | | |
|-----------|--|--|

NOTE No elimination rules are enabled by default for Sanction records.

2.3.4 Name Matching Rules

| Group Code | Matching Rule | Logic Summary | Example Matching Data | |
|------------|----------------------------|--|-----------------------|----------------------|
| I010 | Exact name | Given names and family name match exactly. | Given Names | Family Name |
| | | | JOSEPH | TSANGA |
| | | | JOSEPH | T'SANGA |
| I020 | Original script name exact | The original script Name fields match exactly. | Original Script Name | Original Script Name |
| | | | АЛЕКСАНДР ОСОКИН | АЛЕКСАНДР ОСОКИН |
| I030 | Standardized given name | Given names match after name standardization using Given name map. Family name matches exactly. | Given Names | Family Name |
| | | | BILL | JONES |
| | | | WILLIAM | JONES |
| I040 | Full name | | Full Names | |

| | | | | |
|--------------------|-------------------------------------|--|---|--|
| | | The full name matches exactly, after standardization of all name tokens using the Given Name Map. | JOHN MIKE SMITH <hr/> JOHN MICHAEL SMITH | |
| I050 | Full name without titles | The full name matches exactly, after standardization of all name tokens using the Given Name Map and removal of titles. | Full Names <hr/> DR DOUGLAS BAKER <hr/> DOUGLAS BAKER | |
| I060 | Abbreviated standardized given name | Given names match using a 'Starts With' comparison, after name standardization using the Given Name Map. Family name matches exactly. | Given Names <hr/> JOSEPH ABANDA <hr/> JOSEPH | Family Name <hr/> TSANGA <hr/> T'SANGA |
| I070 Group Code | Given name similar and sounds like | Given name matches with an Edit Distance of 1 or 2 after name standardization. At least one of the given names, excluding initials, must match by a 4-character Metaphone key. Family name matches exactly | Given Names | Family Name |
| I070 | Given name similar and sounds like | Given name matches with an Edit Distance of 1 or 2 after name standardization. At least one of the given names, excluding initials, must match by a 4-character Metaphone key. Family name matches exactly | Given Names <hr/> JOSEPH JOESPH <hr/> | Family Name <hr/> ABANDA ABANDA <hr/> |
| I080 | First name similar and sounds like | The first given name matches with an Edit Distance of 1 or 2 and with a Character Match Percentage of 66% or more after given | Given Names <hr/> AMER MOHAMMAD RASHEED | Family Name <hr/> AL UBAIDI |

| | | | | |
|------|-----------------------------------|--|---------------------------|----------------------|
| | | name standardization. At least one of the given names, excluding initials, must match by a 4-character Metaphone key. Family name matches exactly. | AMIR RASHID MOHAMMED | AL UBAIDI |
| I090 | Additional given names | All name tokens from the given names field with fewest tokens must be present in the other given names field. Family name matches exactly. | Given Names | Family Name |
| | | | MOHAMMED | HANIF |
| | | | DIN MOHAMED | HANIF |
| I100 | Additional names | All name tokens from the full name with fewest tokens must be present in the other full name. At least 2 name tokens must match with the same matching logic; that is, if a name only has one token it is not considered a match. At least 2 name tokens must exist in the Full Name. Note: Word Match Count may return >1 if a single name matches twice in a longer name string. For example, 'ABDUL' matches 'ABDUL ABDUL' with a Word Match Count of 2. Matching is order sensitive. | Full Name | |
| | | | LOTFI RIHANI | |
| | | | LOTFI BEN ABDUL HAMID BEN | |
| | | | ALI RIHANI | |
| I110 | Original script name in any order | All names in the original script name fields match, regardless of order. | Original Script Name | Original Script Name |
| | | | Καρλος Μολινα | Μολινα Καρλος |
| I120 | Original script name with typos | Original script name fields match with an | Original Script Name | Original Script Name |

| | | 80%+ Character Match Percentage score. | Καρλος Μολινα | Καρλος Μολινα | | | | | | | | |
|-----------------------|--|--|--|------------------|-------------|-------------|--------------------|---------|--------------------|-----------|---------|----------|
| I130 | All names in any order | All names in the full name match (using a Word Edit Distance of 0) after name token standardization, in any order. A single typo (1 character edit) is allowed in each name token. | <table border="1"> <tr><th colspan="2">Full Name</th></tr> <tr><td colspan="2">ABDUL JABBER OMARI</td></tr> <tr><td colspan="2">OMARI ABDUL JABBER</td></tr> </table> | | Full Name | | ABDUL JABBER OMARI | | OMARI ABDUL JABBER | | | |
| Full Name | | | | | | | | | | | | |
| ABDUL JABBER OMARI | | | | | | | | | | | | |
| OMARI ABDUL JABBER | | | | | | | | | | | | |
| I140 Group Code | Abbreviated given name | Given names match using a 'Starts With' comparison. Family name is a close Metaphone match. | <table border="1"> <tr><th>Given Names</th><th>Family Name</th></tr> <tr><td>CHRIS</td><td>HUNT</td></tr> <tr><td>CHRISTOPHER</td><td>HUNTER</td></tr> </table> | | Given Names | Family Name | CHRIS | HUNT | CHRISTOPHER | HUNTER | | |
| Given Names | Family Name | | | | | | | | | | | |
| CHRIS | HUNT | | | | | | | | | | | |
| CHRISTOPHER | HUNTER | | | | | | | | | | | |
| I150 | Abbreviated given name and family name typos | Given names match using a 'Starts With' comparison, after name standardization using Given Name Map. Family name matches with an edit difference of 1-2. At least one of the family name tokens, excluding initials, must match by a 4character Metaphone key. | <table border="1"> <tr><th>Given Names</th><th>Family Name</th></tr> <tr><td>IBRAHIM</td><td>MOHAMED</td></tr> <tr><td>ABDUL SALAM</td><td>BOYASSEER</td></tr> <tr><td>IBRAHIM</td><td>BOYASEER</td></tr> </table> | | Given Names | Family Name | IBRAHIM | MOHAMED | ABDUL SALAM | BOYASSEER | IBRAHIM | BOYASEER |
| Given Names | Family Name | | | | | | | | | | | |
| IBRAHIM | MOHAMED | | | | | | | | | | | |
| ABDUL SALAM | BOYASSEER | | | | | | | | | | | |
| IBRAHIM | BOYASEER | | | | | | | | | | | |
| I160 | Abbreviated given name without titles and family name with typos | The first given name matches with a "Starts With" match, after name token standardization and stripping titles. Family name matches with an edit difference of 12. At least one of the family name tokens, excluding initials, must match by a 4character Metaphone key. | <table border="1"> <tr><th>Given Names</th><th>Family Name</th></tr> <tr><td>SAHIR</td><td>BARHAN</td></tr> <tr><td>DR SAHIR MUSA</td><td>BERHIN</td></tr> </table> | | Given Names | Family Name | SAHIR | BARHAN | DR SAHIR MUSA | BERHIN | | |
| Given Names | Family Name | | | | | | | | | | | |
| SAHIR | BARHAN | | | | | | | | | | | |
| DR SAHIR MUSA | BERHIN | | | | | | | | | | | |

| I170 | Original script name in any order with typos | All names in the original script name fields match, regardless of order, with each name requiring an 80%+ Character Match Percentage score. | <table border="1"> <tr> <th data-bbox="894 201 1109 296">Original Script Name</th> <th data-bbox="1109 201 1331 296">Original Script Name</th> </tr> <tr> <td data-bbox="894 296 1109 352">Хасан Ченгић</td> <td data-bbox="1109 296 1331 352">Ченгић Хасан</td> </tr> </table> | Original Script Name | Original Script Name | Хасан Ченгић | Ченгић Хасан | | | |
|-----------------------|---|--|---|----------------------|----------------------|-----------------------|--------------|--------|------|--|
| Original Script Name | Original Script Name | | | | | | | | | |
| Хасан Ченгић | Ченгић Хасан | | | | | | | | | |
| I180 | First name and full name similar and sounds like | The full name matches with a Character Match Percentage of 80% or above, after name token standardization. At least one of the family name tokens, excluding initials, must match by a 4-character Metaphone key. | <table border="1"> <tr> <th data-bbox="894 455 1109 506">Given Names</th> <th data-bbox="1109 455 1331 506">Family Name</th> </tr> <tr> <td data-bbox="894 506 1109 611">MOHAMMAD HUSAYN</td> <td data-bbox="1109 506 1331 611">MASTASAEED</td> </tr> </table> | Given Names | Family Name | MOHAMMAD HUSAYN | MASTASAEED | | | |
| Given Names | Family Name | | | | | | | | | |
| MOHAMMAD HUSAYN | MASTASAEED | | | | | | | | | |
| I190 | Given name similar and family names and sounds like | The given name matches with an Edit Distance of 1 or 2, after name standardization. The given name matches by 4-character Metaphone key, after name standardization. The family name matches with an Edit Distance of 1-2. The family name matches by 4-character Metaphone key. | <table border="1"> <tr> <th data-bbox="894 871 1109 921">Given Names</th> <th data-bbox="1109 871 1331 921">Family Name</th> </tr> <tr> <td data-bbox="894 921 1109 1077">AMER MOHAMMAD RASHEED</td> <td data-bbox="1109 921 1331 1077">AL UBAIDI</td> </tr> </table> | Given Names | Family Name | AMER MOHAMMAD RASHEED | AL UBAIDI | | | |
| Given Names | Family Name | | | | | | | | | |
| AMER MOHAMMAD RASHEED | AL UBAIDI | | | | | | | | | |
| I200 | Abbreviated given name and family name similar | The first given name matches with a "Starts With" match, after name token standardization. The family name matches with an Edit Distance of 1 or 2. The family name matches by 4-character Metaphone key. | <table border="1"> <tr> <th data-bbox="894 1417 1159 1505">Given names</th> <th data-bbox="1159 1417 1331 1505">Family name</th> </tr> <tr> <td data-bbox="894 1505 1159 1610">VIKTOR ANATOLYEVIC H</td> <td data-bbox="1159 1505 1331 1610">BOUT</td> </tr> <tr> <td data-bbox="894 1610 1159 1669">VICTOR</td> <td data-bbox="1159 1610 1331 1669">BOOT</td> </tr> </table> | Given names | Family name | VIKTOR ANATOLYEVIC H | BOUT | VICTOR | BOOT | |
| Given names | Family name | | | | | | | | | |
| VIKTOR ANATOLYEVIC H | BOUT | | | | | | | | | |
| VICTOR | BOOT | | | | | | | | | |

| | | | | |
|--------------------|--|---|---|---|
| I210 | Original script name additional names | All names in one original script name field must be fully contained within the other field, provided there are at least two names in each field. | Original Script Name Миленко Врачар | Original Script Name Миленко Иванович Врачар |
| I220 Group Code | Additional names typo tolerant | All name tokens from the full name with fewest tokens must be present in the other full name. A character error tolerance of 20% is allowed (that is, one character edit every 5 characters). At least 2 name tokens must match with the same matching logic. If a name contains only one token it is not considered a match according to this rule. Note: Word Match Count may return >1 if a single name matches twice in a longer name string. For example, 'ABDUL' matches 'ABDUL ABDUL' with a Word Match Count of 2. Matching is order sensitive. | Full Name ABDUL WAHED SHAFIQ ABDUL WAHAD | |
| I230 | Full name contained and multiple names in common | The full name matches with a 'Contains' match, after standardization of all name tokens using the Given Name Map. At least 2 name tokens must match in the full name. | Full Name ABU BAKAR ABU BAKAR BA'ASYI | |
| I240 | Full name characters longer | The full name matches with a Longest | Full Name MOHAMMED AL GHABRA ALGHABRA MUHAMAD | |

| | | | | |
|------|--|---|---|--|
| | | Common Substring Sum Percentage of 90%+, relating to the longer string, and considering substrings of 5 characters or more in length, after name standardization. | RAMATULLAH WAHIDYAR FAQIR MOHAMMAD <hr/> WAHIDYAR RAMA TULLAH | |
| I250 | Original script name additional names with typos | All names in one original script name field must be fully contained within the other field, provided there are at least two names (all of which have an 80%+ Character Match Percentage) in each field. | Original Script Name Юри Неёлов | Original Script Name Юрий Васильевич Неёлов |
| I260 | Abbreviated first name | The first given name matches with a "Starts With" match, after name token standardization. Family name matches exactly. | Given Names KHADAF ABUBAKAR KHADAFFI | Family Name JANJALANI JANJALANI |
| I270 | Additional names in any order | All name tokens from the full name with fewest tokens must be present in the other full name. At least 2 name tokens must match with the same matching logic. If a name contains only one token it is not considered a match according to this rule. Note: Word Match Count may return >1 if a single name matches twice in a longer name string. For example, 'ABDUL' matches 'ABDUL ABDUL' with a Word Match Count of 2. Matching is not order-sensitive. | Full Name HA THI NGUYEN THI HA | |
| I280 | Additional names in any | All name tokens from the full name with fewest tokens must be | Full Name STEPHENS MARTIN | |

| | | | | | | | |
|----------|------------------------|--|--|---------|------|----------|--|
| | order tolerant typo | <p>present in the other full name. A character error tolerance of 20% is allowed (that is, one character edit every 5 characters). At least 2 name tokens must match with the same matching logic. If a name contains only one token it is not considered a match according to this rule.</p> <p>Note: Word Match Count may return >1 if a single name matches twice in a longer name string. For example, 'ABDUL' matches 'ABDUL ABDUL' with a Word Match Count of 2.</p> <p>Matching is not order-sensitive.</p> | <table border="1"> <tr> <td>MARRTIN</td> <td>JOHN</td> </tr> <tr> <td>STEPHENS</td> <td></td> </tr> </table> | MARRTIN | JOHN | STEPHENS | |
| MARRTIN | JOHN | | | | | | |
| STEPHENS | | | | | | | |

2.3.5 Loose Name Matching Rules

| Group Code | Matching Rule | Summary of Rule Logic | Example Matching Data | | | |
|-------------------|--|---|---|-----------|---------------|-------------------|
| I290 | Full name characters shorter | The full name matches with a Longest Common Substring Sum Percentage of 90%, relating to the shorter string, and considering substrings of 5 characters or more in length, after name standardization. At least 2 name tokens must exist in the full name. | <table border="1"> <tr> <td>Full Name</td> </tr> <tr> <td>ABU BAKAR</td> </tr> <tr> <td>ABU BAKAR BA'ASYI</td> </tr> </table> | Full Name | ABU BAKAR | ABU BAKAR BA'ASYI |
| Full Name | | | | | | |
| ABU BAKAR | | | | | | |
| ABU BAKAR BA'ASYI | | | | | | |
| I300 | Full name no initials match with initials in any order relating to shorter | All initials in one Full Name field must be fully contained within the initials of the other Full Name field; AND the standardized Full Name field without initial must be fully contained within the other standardized Full Name field without initials; AND both fields must contain at least two names. | <table border="1"> <tr> <td>Full Name</td> </tr> <tr> <td>CARL J FISHER</td> </tr> <tr> <td>J C FISHER</td> </tr> </table> | Full Name | CARL J FISHER | J C FISHER |
| Full Name | | | | | | |
| CARL J FISHER | | | | | | |
| J C FISHER | | | | | | |

| | | | |
|------|--|--|-----------|
| I310 | Full name contained, last initial same, primary list is single token | The Full Name field from the watch list record contains only one name, which is fully contained within the record being screened; AND the initial of the last name in the record being screened must match the initial of the name in the watch list record. | Full Name |
| | | | JANINE |
| | | | CHERRY |
| | | | CHERRY |

2.3.6 Deprecated Name Matching Rules

The following rules are assigned the Rule Group Code I990. These are legacy rules that are superseded by the Deprecated Name Matching Rules set, and are included here to assist existing Customer Screening customers with the transition to the current version.

| Name matching rule | Summary of rule logic | Example matching data | |
|----------------------|--|-----------------------|-------------|
| Given name in common | At least one given name is found in common, after name standardization. Family name matches exactly. | Given Names | Family Name |
| | | HASSAN ALI | AL TIKRITI |
| | | IBRAHIM HASSAN | AL TIKRITI |
| | | | |

| Name matching rule | Summary of rule logic | Example matching data | |
|---|--|-------------------------|-------------|
| Full name similar and family name sounds like | Full name matches with a Character Match Percentage of 80% or more after name standardization. At least one of the family name tokens (excluding initials) must match by a 4character Metaphone key. | Full Name | |
| | | AKHYAR MOHAMMED MANSOUR | |
| | | AKHTAR MANZUR | MUHAMED |
| Similar first name | The first given name matches with an edit distance of between 1 and 2 after | Given Names | Family Name |

| | | | |
|---|---|---|--------------------------------------|
| | name standardization, and with a Character Match Percentage of 66% or more. Family name matches exactly. | MIKOLAI NIKOLAI TIMOFEEVICH | METELITSA METELITSA |
| Similar first name and family name | The first given name matches with an edit distance of between 1 and 2 after name standardization, and with a Character Match Percentage of 66% or more. Family name matches with a Character Match Percentage of 66% or more. At least one of the family name tokens (excluding initials) must match by a 4-character Metaphone key. | Given Names GENNADY GENNADIY | Family Name NEVYGLAS NYAVIGLAS |
| Given names in common and similar family name and sounds like | At least one given name is found in common, after name standardization. The family name matches with a Character Edit Distance of 1-2. The family name matches by 4-character Metaphone key. | Given Names ABDUL JABBAR FAROUK ABDUL | Family Name OMAIRI OMARI |
| Abbreviated standardized given name and family name contained | Given names match using a 'Starts With' comparison, after name standardization using the Given Name Map. Family name matches using 'Contains' comparison after token standardization. | Given Names A ABDUL | Family Name RAHIMI RAHIM |
| Similar given name | The given name matches with a Character Edit Distance of between 1 and 2 after name standardization. Family name matches exactly. | Given Names NAY NYAW | Family Name WIN WIN |
| Full name contained | The full name matches with a 'Contains' match, after standardization | Full Name CHARNI KOKO | |

| | | | | | | | | | |
|--|--|--|--|-------------|------------------------|-------------------------|-----------|----------|-----------|
| | of all name tokens using the Given Name Map. | KO KO | | | | | | | |
| Full name similar | The full name matches with a Character Match Percentage of 80% or above, after name token standardization. | <table border="1"> <tr><td>Full Name</td></tr> <tr><td>JUAN LOIS RUBENACHROIG</td></tr> <tr><td>JUAN LOIS RUBENACH ROIZ</td></tr> </table> | | Full Name | JUAN LOIS RUBENACHROIG | JUAN LOIS RUBENACH ROIZ | | | |
| Full Name | | | | | | | | | |
| JUAN LOIS RUBENACHROIG | | | | | | | | | |
| JUAN LOIS RUBENACH ROIZ | | | | | | | | | |
| Abbreviated first name and similar family name | The first given name matches with a 'Starts With' match, after name token standardization. The family name matches with a Character Edit Distance of 1-2. | <table border="1"> <tr><td>Given Names</td><td>Family Name</td></tr> <tr><td>A</td><td>UMARI</td></tr> <tr><td>ABU</td><td>OMAR</td></tr> </table> | | Given Names | Family Name | A | UMARI | ABU | OMAR |
| Given Names | Family Name | | | | | | | | |
| A | UMARI | | | | | | | | |
| ABU | OMAR | | | | | | | | |
| Given name in common and similar family name | At least one given name is found in common, after name standardization. The family name matches with a Character Edit Distance of 1-2. The family name matches by 4-character Metaphone key. | <table border="1"> <tr><td>Given Names</td><td>Family Name</td></tr> <tr><td>NURJAMAN RIDUAN</td><td>ISAMU DIN</td></tr> <tr><td>RIDUAN</td><td>ISOMUDDIN</td></tr> </table> | | Given Names | Family Name | NURJAMAN RIDUAN | ISAMU DIN | RIDUAN | ISOMUDDIN |
| Given Names | Family Name | | | | | | | | |
| NURJAMAN RIDUAN | ISAMU DIN | | | | | | | | |
| RIDUAN | ISOMUDDIN | | | | | | | | |
| First name and family similar | The first given name matches with a Character Edit Distance of between 1 and 2 after name standardization, and with a Character Match Percentage of 66% or more. Family name matches with a Character Match Percentage of 66% or more. | <table border="1"> <tr><td>Given Names</td><td>Family Name</td></tr> <tr><td>REGINADL</td><td>GOODRIDGE</td></tr> <tr><td>REGINALD</td><td>GOODRICH</td></tr> </table> | | Given Names | Family Name | REGINADL | GOODRIDGE | REGINALD | GOODRICH |
| Given Names | Family Name | | | | | | | | |
| REGINADL | GOODRIDGE | | | | | | | | |
| REGINALD | GOODRICH | | | | | | | | |

2.3.7 Ranking matches within Name rules

| Match Rule | Summary of Matching Logic | Example Matching Data | | | | | | |
|------------------------|---|--|---------|------|------------|--------|------------|------------------|
| [Name rule], city, DoB | At least one city matches. The date of birth matches exactly. | <table border="1"> <tr><td>DoB</td><td>City</td></tr> <tr><td>01/11/1963</td><td>London</td></tr> <tr><td>01/11/1963</td><td>New York London</td></tr> </table> | DoB | City | 01/11/1963 | London | 01/11/1963 | New York London |
| DoB | City | | | | | | | |
| 01/11/1963 | London | | | | | | | |
| 01/11/1963 | New York London | | | | | | | |
| | | DoB | Country | | | | | |

| | | | | |
|--|---|------------|-------------------|---------|
| [Name rule], country, DoB | At least one country matches. The date of birth matches exactly. | 25/01/1959 | PK IN US | |
| | | 25/01/1959 | PK | |
| [Name rule], DoB | The date of birth matches exactly. | DoB | | |
| | | 19/09/1968 | | |
| | | 19/09/1968 | | |
| [Name rule], city, YoB, no DoB | At least one city matches. Year of birth matches. No date of birth provided. | YoB | City | DoB |
| | | 1978 | Lahore Mumbai | - |
| | | 1978 | Lahore | - |
| [Name rule], country, YoB, no DoB | At least one country matches. Year of birth matches. No date of birth provided. | YoB | Country | DoB |
| | | 1962 | IQ US | - |
| | | 1962 | IQ | - |
| [Name rule], YoB, no DoB | Year of birth matches. No date of birth provided. | YoB | | DoB |
| | | 1975 | | - |
| | | 1975 | | - |
| [Name rule], city, DoB similar Match Rule | At least one city matches. Dates of birth are a close match, according to one of the following parameters only: DD and MM values are transposed, but YYYY matches exactly. DD and MM match, YYYY does not. DD and YYYY match, MM does not. DD values differ by 5 or less. | DoB | | City |
| | | 08/04/1967 | | Riyadh |
| | | 04/08/1967 | | Riyadh |
| | | | | |
| [Name rule], country, DoB similar | At least one country matches. Dates of birth are a close match, according to one of the following parameters only: | DoB | | Country |
| | | 08/04/1967 | | SA |
| | | 08/04/1977 | | SA |

| | | |
|---|---|---|
| | DD and MM values are transposed, but YYYY matches exactly. DD and MM match, YYYY does not. DD and YYYY match, MM does not. DD values differ by 5 or less. | |
| [Name rule], DoB similar | Dates of birth are a close match, according to one of the following parameters only: DD and MM values are transposed, but YYYY matches exactly. DD and MM match, YYYY does not. DD and YYYY match, MM does not. DD values differ by 5 or less. | DoB 19/06/1967 16/06/1967 |
| [Name rule], city, YoB (DoB conflict) | At least one city matches. Year of birth matches. Dates of birth do not match. | YoB City DoB 1978 Lahore Mumbai 1978 Lahore 04/08/1978 |
| [Name rule], country, YoB (DoB conflict) | At least one country matches. Year of birth matches. Dates of birth do not match. | YoB Country DoB 1962 IQ 05/07/1962 1962 IQ 04/11/1962 |
| [Name rule] YoB (DoB conflict) | Year of birth matches. Dates of birth do not match. | YoB DoB 1962 05/07/1962 1962 04/11/1962 |
| [Name rule], city | At least one city matches. | City Lahore Mumbai Lahore |
| | At least one country matches. | Country |

| | | | | | |
|-------------------------|---|--|------------------------------------|---------|------------|
| [Name rule], country | | | IQ PK | | |
| | | | IQ | | |
| [Name only] | [Name rule] | The name rule returns a match. No data in other fields. | Name | Country | DoB |
| | | | J SMITH | - | - |
| | | | J SMITH | - | - |
| [Name rule] (conflict) | [Name rule] | The name rule returns a match. Data in other fields do not match. | Name | Country | DoB |
| | | | J SMITH | IQ | 05/07/1962 |
| | | | J SMITH | UK | 04/11/1974 |
| E040 | Name without suffixes exact | The entity names match exactly after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. | CAPITAL DIRECT LTD | | |
| | | | CAPITAL DIRECT AG | | |
| E050 | Name without business words similar and sounds like | The entity names match with a Word Match Percentage of 80% after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. | PARAGON UK | | |
| | | | PARAGON INVESTMENT CORPORATION | | |
| E060 | Name without business words exact | The entity names match exactly after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. | LIFE HEALTHCARE GROUP HOLDINGS LTD | | |
| | | | LIFE HEALTH CARE | | |

| | | | |
|--------------------|--|--|---------------------------------------|
| | | | INC |
| E070 | Name without business words has all words out-oforder | All remaining words in each entity name match exactly, but in any order, after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. | EDUCATION FOR HEALTH |
| | | | HEALTH EDUCATION SERVICES |
| | | | |
| E080 | Name without suffixes 'Starts With' and multiple names in common | The entity names are a 'Starts With' match after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two significant words (not common business words) in common between the two names. The listed name is not an acronym alias of a longer primary entity name. | BAE SYSTEMS (LANCASTER HOUSE) LIMITED |
| | | | BAE SYSTEMS PLC |
| | | | |
| E090 | Name without business words has all words with typos | All remaining words in each entity name match with a Character Match Percentage of 80 or more, after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. | GERBERA ASSOCIATES LTD |
| | | | BERBERA |
| | | | |
| E100 Group Code | Original script name in any order | All words in the Original Script Names match exactly, in any order. | ΟΑΟ ΗΙΑΕΠ |
| | | | ΗΙΑΕΠ ΟΑΟ |
| E110 | Original script name with typos | The Original Script Names match with a Character Match Percentage of 80% or more. | Επαναστατική Αριστερά |
| | | | Επαναστατική Αριστερά |
| E120 | | The entity names match with a Character Match Percentage of 80 ore more after | GOLDSTREAM PROPERTIES LTD |

| | | | |
|------|--|--|--|
| | Name without business words with typos, and sounds like | number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key and the first three letters of each name are the same. | GOLDSTEIN PROPERTIES INC |
| E130 | Name without suffixes contains, similar and multiple names in common | The entity names are a 'Contains' match and the Word Edit Distance is no more than one between the names (where each word matches with a Character Match Percentage of 80 or more), after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two significant words (not common business words) in common between the two names. | HAMPSHIRE HERITAGE DEVELOPMENTS LTD HERITAGE DEVELOPMENT CORPORATION |
| E140 | Name has additional words, sounds like and multiple names in common | All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two significant words (not common business words) in common between the two names. The list name is not an acronym alias of a longer primary entity name. | MOSCOW CITY CENTER PLC MOSCOW CENTER |
| E150 | Name without business words contains, sounds like and multiple names in common | The entity name is a 'Contains' match with a listed entity name, after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There are at least two significant words (not common business words) in common between the two names. The first word of each name has the same 4-character Metaphone key. | HI-TECH RECRUITMENT LTD HI TECH GROUP |
| E160 | | | Μαύρος Σεπτέμβρης |

| | | | |
|-----------------------|---|---|--|
| | Original script name in any order with typos | All words in the original script name match with a Character Match Percentage of 80 or more, in any order. | Σεπτέμβρης Μαύροζς |
| E170 Group Code | Name without business words has most words out-oforder | The entity names match (in any order) with a Word Match Percentage of between 75 and 99, after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The list name is not an acronym alias of a longer primary entity name. | BACK TO HEALTH CLINICS LIMITED |
| | | | BACK TO HEALTH CHIROPRACTIC |
| | | | |
| E180 | Name without business words, similar, sounds like, with multiple names and a residual token in common | All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There are at least two significant words (not common business words) in common between the two names, and at least one of these is not a word in the English dictionary or a very common word in Watchlist name data. The list name is not an acronym alias of a longer primary entity name. | CHARLES ASH UK LTD |
| | | | CHARLES F ASH CONSTRUCTION CO INC |
| | | | |
| E190 | Name without business words, similar with typos, sounds like, with multiple names and residual token in common. | All words in the shorter entity name match with a Character Match Percentage of 80 or more in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There are at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more, and at least one of these is not a word in the English dictionary or a very common word in Watchlist name data. The list name is not | CLARKS HOME BAKERY LTD |
| | | | CLARK HOMES INC |
| | | | |

| | | | |
|------|--|--|---|
| | | <p>an acronym alias of a longer primary entity name.</p> <p>The group name differs from the rule name.</p> | |
| E200 | <p>Name without business words, similar, sounds like, and residual token in common</p> | <p>All words in the shorter entity name match in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The names match with a Word Match Percentage of 50 or more when common business words are not stripped. There are at least two significant words (not common business words) that match. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name.</p> | AMERICAN MILITARY SUPPLY |
| | | | AMERICAN SUPPLY CO |
| | | | |
| E210 | <p>Name has additional words tolerant, sounds like and multiple names in common</p> | <p>All words in the shorter entity name match in the longer entity name (in order) with a Character Match Percentage of 80 or more after number cardinal and ordinal standardization. There are at least two significant words (not common business words) in common between the two names. The list name is not an acronym alias of a longer primary entity name.</p> | GENERAL ATOMICS |
| | | | GENERAL BUREAU OF ATOMIC ENERGY GBAE |
| | | | |
| E220 | <p>Name without suffixes contains, similar and residual token in common</p> | <p>The entity names are a 'Contains' match and the Word Edit Distance is no more than one between the names (where each word matches with a Character Match Percentage of 80 or more), after number cardinal and ordinal</p> | ACCLAIM ACM LTD |
| | | | ACM |
| | | | |

| | | | |
|------|--|--|---|
| | | standardization, and after common company | |
| | | prefixes and suffixes are removed. There is at least one significant word in common (not a common business word, a word in the English dictionary or a very common word in Watchlist name data). | |
| E230 | Name without suffixes 'Starts With' and residual token in common | The entity names are a 'Starts With' match after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There is at least one significant word in common (not a common business word, a word in the English dictionary or a very common word in Watchlist name data). The listed name is not an acronym alias of a longer primary entity name. | ENRON METALS BROKERS LTD |
| | | | ENRON CORP |
| | | | |
| E240 | Name without suffixes 'Starts With' and substring in common | The entity names are a 'Starts With' match, and there is a common substring at least 8 characters in length, after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. The listed name is not an acronym alias of a longer primary entity name. | ACCURATE SECTION BENDERS LTD |
| | | | ACCURATE |
| | | | |
| E250 | Name without suffixes contains, residual token in common and significant overlap | The entity names are a 'Contains' match and the Word Match Percentage is 50 or more, after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There is at least one significant word in common (not a common business word, a word in the English dictionary or a very common word in Watchlist name data). | NON EMERGENCY TRANSPORT INC |
| | | | ACTION NON EMERGENCY TRANSPORTATION |
| | | | |
| E260 | Name without common tokens | The entity names match exactly, with at least two words matching, after number | LIFE CARE CENTER PUNTA GORDA |

| | | | |
|-----------------------|--|---|---|
| | exact, and multiple residual tokens in common | cardinal and ordinal standardization, and after common company prefixes, suffixes, and other words, and all English dictionary and common Watchlist name words are removed. | PORT OF PUNTA GORDA |
| E270 | Original script name has additional names | All words in the shorter original script name match in the longer original script name (in order), and there are at least two matching words. | Въроръжена ислямска група Въроръжена група |
| E280 | Name without suffixes contains, multiple names in common and significant overlap | The entity names are a 'Contains' match and the Word Match Percentage is 50 or more, after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There is at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more. | CITY TRANS LTD CAPITAL CITY TRANS SERV INC |
| E290 Group Code | Name without business words | The entity names match with a Character Match Percentage of between 80 and 99 after number cardinal and ordinal standardization, and after | IBERIA AIRLINES IBERAIR LINES |
| | similar and full name sounds like | common company prefixes, suffixes and other words are removed. The names share the same metaphone key after number cardinal and ordinal standardization. | |
| E300 | Name without business words similar with typos, sounds like | All words in the shorter entity name match with a Character Match Percentage of 80 or more in the longer entity name (in order) after number | MED CLINIC LTD MED AMERICA CLINICS INC |

| | | | |
|------|--|---|---|
| | and significant overlap | cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The names match with a Word Match Percentage of 50 or more when common business words are not stripped. There are at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more. The first word of each name has the same 4character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | |
| E310 | Name has additional words, sounds like and residual token in common | All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization. There is at least one significant word (not a common business word, an English dictionary word or a word or a common Watchlist name word) in common between the two names. The list name is not an acronym alias of a longer primary entity name. | DJ CASE AND ASSOCIATES INC DJ AND ASSOCIATES INC |
| E320 | Name has additional words with typos, sounds like and residual token in common | All words in the shorter entity name match with a Character Match Percentage of 80 or more in the longer entity name (in order) after number cardinal and ordinal standardization. There is at least one significant word (not a common business word, an English dictionary word or a word or a common Watchlist name word) that matches with a Character Match Percentage of 80 or more. The list name is not an acronym alias of a longer primary entity name. | GARLOCK GARLICK HELICOPTERS INC |
| E330 | Name has additional words, sounds like | All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal | NATIONWIDE SECRETARIAL SERVICES LTD |

| | | | |
|-----------------|---|---|---|
| | and substring in common | standardization. There is a common substring of at least 8 characters in length between the two names after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The list name is not an acronym alias of a longer primary entity name. | NATIONWIDE SERVICES |
| E340 Group Code | Name without business words, similar, sounds like and multiple names in common | All words in the shorter entity name match in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There are at least two | CENTRAL OKLAHOMA FAMILY MEDICAL CENTER |
| | | significant words (not common business words) that match. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | CENTRAL MEDICAL INC |
| E350 | Name without business words, similar with typos, sounds like and multiple names in common | All words in the shorter entity name match with a Character Match Percentage of 80 or more in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There are at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | BLACK CHAIR LTD BLACK WORLD COLLEGE OF HAIR DESIGN |
| E360 | Name without business words has | The entity names match with a Character Match Percentage of between 80 and 99 after number cardinal and ordinal | BOURNE CHIROPRACTIC LTD |

| | | | |
|------|--|---|--|
| | typos and sounds like | standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. | BARNO CHIROPRACTIC |
| E370 | Name without suffixes contains with typos and multiple names in common | The entity names are a "Contains" match where each word matches with a Character Match Percentage of 80 or more after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two significant words (not common business words) that match. | NEW ORLEANS MEDICAB OF METRO NEW ORLEANS |
| E380 | Name without suffixes contains, similar, and multiple words in common | The entity names are a 'Contains' match and the Word Edit Distance is no more than one between the names (where each word matches with a Character Match Percentage of 80 or more), after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more. | GROSVENOR NURSING SERVICES NURSING SERVICES INC |
| E390 | Original script name has additional names with typos | All words in the shorter original script name match in the longer original script name (in order) with a Character Match Percentage of 80 or more, and there are at least two matching words. | Арабски революционни бригади Арабски революциони |
| E400 | Name has additional words and sounds like | All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization. | ATRIUM INCORPORATORS WORLDWIDE LTD ATRIUM |
| E410 | Name has additional words | All words in the shorter entity name match in the longer entity name (in | BRILLIANT GENERAL |

| | | | |
|------|---|--|---|
| | with typos and sounds like | order) with a Character Match Percentage of 80 or more after number cardinal and ordinal standardization. The first word of each name has the same 4-character Metaphone key. | BUILDING CONTRACTOR LTD BRILLIANCE |
| E420 | Name without business words loose match and full name sounds like | The entity names match with a Character Match Percentage of between 60 and 79 after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The names have the same Metaphone key. | BRC PRC |

2.3.8 Loose Entity Matching Rules

| Group Code | Name Matching Rule | Summary of Rule Logic | Example Matching Data |
|------------|---|--|---|
| E430 | Name without business words contains, sounds like, and residual token in common | The entity names are a 'Contains' match after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There is at least one significant word (not a common business word, and an English dictionary word or a very common word in Watchlist name data) in common between the two names. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | HENDERSON EQUITY PARTNERS GP LTD |
| | | | HENDERSON MANAGEMENT GROUP INC |
| E440 | Name without business words contains, sounds | The entity names are a 'Contains' match and there is a common substring at least 8 characters in length after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has | HAMILTON NEWS |
| | | | HAMILTON INVESTMENT CORP |

| | | | |
|------|---|--|---|
| | like, and substring in common | the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | |
| E450 | Name without suffixes 'Starts With' | The entity names are a 'Starts With' match after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. The list name is not an acronym alias of a longer primary entity name. | JACOB |
| | | | JACOBSON MANAGEMENT CO |
| | | | |
| E460 | Name without business words has additional words and sounds like | All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | IDEAL SOLUTION ESTATES MANAGEMENT LTD |
| | | | IDEAL ENTERPRISES INC |
| | | | |
| E470 | Name without business words has additional words with typos and sounds like | All words in the shorter entity name match with a Character Match Percentage of 80 or more in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | AVANT GARD LTD |
| | | | AVANTI ENTERPRISES INC |
| | | | |
| E480 | Name without business words contains and sounds like | The entity names are a 'Contains' match after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | MOREX TRADING LTD |
| | | | MOREXPRESS SA DE CV |
| | | | |

| | | | |
|------|--|--|---|
| E490 | Name without suffixes 'Starts With' and allows acronyms | The entity names are a 'Starts With' match after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. | INTERTRADE CLASSIC LTD |
| | | | INTER |
| | | | |
| E500 | Name without suffixes contains, significant overlap and multiple words in common | The entity names are a 'Contains' match, there are at least two words that match with a Character Match Percentage of 80 or more, and the two entity names match with a Word Match Percentage of 50 or more after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. | EG ANDG TECHNICAL SERVICES INC |
| | | | TECHNICAL SERVICES |
| | | | |
| E510 | Name contains with typos and multiple words in common | The entity names are a "Contains" match where each word matches with a Character Match Percentage of 80 or more after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two words (not prefixes or suffixes) that match. | FIRSA INTERNATIONAL LTD |
| | | | FIRST INTERNATIONAL COMMERCE BANK LTD |

2.3.9 Ranking matches within Entity Name rules

For each entity or vessel name matching rule, matches are ranked according to how much and how strongly additional data matches between the customer record and the watch list:

| Match Rule | Summary of Matching Logic | Example Matching Data | |
|-----------------------------|--|-----------------------|---------|
| [Entity name city, country] | At least one city matches. At least one country matches. | City | Country |
| | | New York London | GB |
| | | London | GB US |

| [Entity name rule], city | At least one city matches. | <table border="1"> <tr><th>City</th></tr> <tr><td>Paris London</td></tr> </table> | | | City | Paris London | | | | | | | |
|-------------------------------|--|--|--|--|---------|----------------|----------|---------|----|--------|---------|----|-------|
| City | | | | | | | | | | | | | |
| Paris London | | | | | | | | | | | | | |
| | | Paris | | | | | | | | | | | |
| [Entity name rule], country | At least one country matches. | <table border="1"> <tr><th>Country</th></tr> <tr><td>US</td></tr> <tr><td>PK IN US</td></tr> </table> | | | Country | US | PK IN US | | | | | | |
| Country | | | | | | | | | | | | | |
| US | | | | | | | | | | | | | |
| PK IN US | | | | | | | | | | | | | |
| [Entity name rule] only | The entity name rule returns a match. No data in other fields. | <table border="1"> <tr><th>Name</th><th>Country</th><th>City</th></tr> <tr><td>ACM</td><td>-</td><td>-</td></tr> <tr><td>ACM</td><td>-</td><td>-</td></tr> </table> | | | Name | Country | City | ACM | - | - | ACM | - | - |
| Name | Country | City | | | | | | | | | | | |
| ACM | - | - | | | | | | | | | | | |
| ACM | - | - | | | | | | | | | | | |
| [Entity name rule] (conflict) | The entity name rule returns a match. Data in other fields do not match. | <table border="1"> <tr><th>Name</th><th>Country</th><th>City</th></tr> <tr><td>ACM</td><td>UK</td><td>London</td></tr> <tr><td>ACM</td><td>FR</td><td>Paris</td></tr> </table> | | | Name | Country | City | ACM | UK | London | ACM | FR | Paris |
| Name | Country | City | | | | | | | | | | | |
| ACM | UK | London | | | | | | | | | | | |
| ACM | FR | Paris | | | | | | | | | | | |
| [Vessel name rule] country | At least one country matches. | <table border="1"> <tr><th>Country</th></tr> <tr><td>US</td></tr> <tr><td>PK IN US</td></tr> </table> | | | Country | US | PK IN US | | | | | | |
| Country | | | | | | | | | | | | | |
| US | | | | | | | | | | | | | |
| PK IN US | | | | | | | | | | | | | |
| [Vessel name rule] only | Vessel name rule returns a match. No data in other fields. | <table border="1"> <tr><th>Name</th><th>Country</th><th>City</th></tr> <tr><td>Dynasty</td><td>-</td><td>-</td></tr> <tr><td>Dynasty</td><td>-</td><td>-</td></tr> </table> | | | Name | Country | City | Dynasty | - | - | Dynasty | - | - |
| Name | Country | City | | | | | | | | | | | |
| Dynasty | - | - | | | | | | | | | | | |
| Dynasty | - | - | | | | | | | | | | | |
| | | <table border="1"> <tr><th>Name</th><th>Country</th><th>City</th></tr> </table> | | | Name | Country | City | | | | | | |
| Name | Country | City | | | | | | | | | | | |

| | | | | |
|----------------------------------|---|---------|----|--------|
| [Vessel name rule] (conflict) | Vessel name rule returns a match. Data in other fields do not match. | Dynasty | UK | London |
| | | Dynasty | FR | Paris |

3 Entity Matching

This section details the default configuration when matching entities to Sanctions, PEP and EDD lists. In general, and by default, the matching strategy for entities in Oracle Financial Services Customer Screening will raise a possible match if there is an exact match or a fuzzy name match to a normal (non-acronym) entity name, or if there is an exact match to an acronym entity name.

The fuzzy entity name matching algorithms include the following techniques (amongst others):

- Standardizing entity names (for example, different forms of company name suffixes are standardized to a common form)
- Ignoring insignificant name tokens
- Typo tolerance
- Allowance for missing name tokens
- Allowance for different tokenization of the name

3.1 Identifier Preparation

The following identifiers are prepared for use in the entity matching process:

| Identifier | Summary of preparation logic |
|--------------------------|---|
| Original Entity Name | The original entity name, after Name Normalization. See section 3.1.1 "Name Normalization" below. |
| Standardized Entity Name | A standardized version of the entity name, with common entity name suffixes standardized. The standardization process may be amended by changing the Reference Data used to standardize tokens (such as LTD) and phrases (such as FIN SERVS). |
| Original Script Name | A whitespace normalized version of the original script name. |
| City | A pipe-separated list of cities. |
| Country Codes | A space-separated list of standard 2-character country codes. |

3.1.1 Name Normalization

Entity names are normalized using the following logic:

- Standardization of accented characters.

- Removal of apostrophes.
- Replacement of all other characters apart from alpha (A-Z or a-z), numeric (0-9) or ampersand (&) characters with spaces.

NOTE

If matching data in the original language against original script names in watch lists, the appropriate character ranges should be removed from the Name Noise Characters Reference Data so that they are not replaced. In addition, if transliterating data before matching, transliteration must be done before the name normalization.

- Normalization of whitespace.
- Conversion to upper case.

3.2 Clustering

Oracle Financial Services Customer Screening provides three different clustering strategies for matching entities: Entity Name Tokens, Name Metaphone, and Name Trimmed. Any of the clusters may be activated or deactivated, as required, and different cluster limits can be configured.

3.2.1 Entity Name Tokens (dnClusterNameTokens)

This cluster uses the standardized entity name to generate cluster keys. The default logic is as follows:

- Remove initials.
- Remove common name tokens, such as Limited, or Corporation.
- Normalize whitespace.
- Convert space characters to pipe characters.

Examples

| dnEntityName | Name with initials and common name tokens stripped | dnClusterNameTokens |
|------------------------------|--|---------------------|
| ANGLO CARIBBEAN CO LTD | ANGLO CARIBBEAN | ANGLO CARIBBEAN |
| GUAMATUR S A | GUAMATUR | GUAMATUR |

3.2.2 Name Metaphone (dnClusterLongName)

This cluster uses the standardized entity name to generate cluster keys. The default logic is as follows:

- Remove initials.
- Remove common name tokens, such as Limited, or Corporation.
- Normalize whitespace.
- Remove common business words, such as Company, or Association.
- Transliterate any non-Latin characters into Latin.
- Apply the Metaphone transformation (the standard double-Metaphone algorithm) outputting a key with a length of up to eight characters.

Examples

| dnEntityName | Name with initials, common name tokens and common business words stripped | dnClusterLongName |
|-------------------------------|---|-------------------|
| HAVANA INTERNATIONAL BANK LTD | HAVANA BANK | HFNPNK |
| CIMEX S A | CIMEX | SMKS |
| LA EMPRESA CUBANA DE FLETES | EMPRESA CUBANA FLETES | AMPRSKPN |

3.2.3 Name Trimmed (dnClusterShortName)

This cluster uses the standardized entity name to generate cluster keys. The default logic is as follows:

- Remove all whitespace.
- Left-trim the value to a maximum of 4 characters.

Examples

| dnEntityName | dnClusterShortName |
|-------------------------------|--------------------|
| HAVANA INTERNATIONAL BANK LTD | HAVA |
| CIMEX S A | CIME |
| LA EMPRESA CUBANA DE FLETES | LAEM |

3.2.4 Registration Country Prohibition (Registration Country Code)

This cluster uses the space-delimited list of registration country codes to generate cluster keys by generating an array of the component country codes.

3.2.5 Operating Country Prohibition (Operating Country Code)

This cluster uses the space-delimited list of operating country codes to generate cluster keys by generating an array of the component country codes.

3.2.6 Start/End Name Tokens (dnClusterStartEndNameTokens)

This clustering method is designed as a looser version of the Entity Name Tokens cluster and allows for variation in entity names by creating clusters for the first five and last five characters of each name token.

The default logic is as follows:

- Remove initials.
- Remove common name tokens, such as Limited, or Corporation.
- Normalize whitespace.
- For each token that is longer than five characters, replace with two new tokens that are:
 - The first five characters of the token.
 - The last five characters of the token.

Examples

| dnEntityName | Name with initials and common name tokens stripped | dnClusterStartEndNameTokens |
|-------------------------------|--|--|
| HAVANA INTERNATIONAL BANK LTD | HAVANA INTERNATIONAL BANK | HAVAN AVANA INTER IONAL BANK |
| CIMEX S A | CIMEX | CIMEX |
| LA EMPRESA CUBANA DE FLETES | LA EMPRESA CUBANA FLETES | LA EMPRE PRESA CUBAN UBANA FLETE LETES |

3.2.7 Original Script Name (dnClusterOriginalScript)

The Original Script Name cluster provides a clustering method for matching names represented in non-Latin writing systems. The cluster builder generates a key for each token in the name.

NOTE A single cluster value of "Myanmar" is generated for original script names written in the Burmese alphabet irrespective of the name. This is needed because token splitting is not possible for the Myanmar writing system as it does not use a space character between words. As a result, all original script name in Burmese will be compared during matching. This should not cause performance issues during screening provided there are a low number of customer records using this writing system.

The default logic of the cluster builder is as follows:

- Split the original script name into several name tokens, using a space character as the delimiter.
- Trim each name token to a maximum of 5 characters.
- Concatenate all of the trimmed token values with a pipe delimiter
- Deduplicate the list of keys.

Examples

| dnOriginalScriptName | dnClusterOriginalScript |
|----------------------|-------------------------|
| Черен септември | Черен септе |
| 北京航空航天大学 | 北 京 航 空 航 天 大 学 |
| မြန်မာ | Myanmar |

3.3 Matching

Entity matching is centered on entity names. Other items of data, such as associated countries and cities, are used to strengthen a possible match.

3.3.1 Match Rules

The match rules in Oracle Financial Services Customer Screening are organized by the level of entity name match, with the strongest name matching rules at the top of the decision table.

Optional elimination rules exist that allow lower risk matches to be suppressed.

The following match rules are involved in entity screening:

- The elimination rules, which are used in the rule templates to suppress the generation of lower risk matches - for example, low quality matches against list records with a low-risk score. The elimination rules may be moved up and down in order to change where they apply.

- The entity name matching rules. Entity name matching rules are organized by the level of entity name match, with the strongest matching rules placed at the top of the decision table.

NOTE

This means that the match rules are not ordered by strength across all identifiers. For example, a weaker match rule that is strengthened by matches on City and Country is likely to be a stronger overall match than a strong match rule with strongly contradictory data in the other fields.

- The loose entity matching rules. These are also based around entity name matching, but identify looser matches and are not enabled by default. These rules are likely to result in a large number of false-positive matches and are most likely to be of use when screening against sanctions lists, where it is important that no true matches are missed.

For the sake of clarity, match rules are divided into groups, as shown below:



As each group is selected, the match rules it contains are displayed in the window below.

The priority of the groups can be changed using the arrows below the Match Rules Group list. When a group is highlighted, you can:

- Click  to move the group up one place on the list.
- Click  to move the group down one place on the list.
- Click  to move the group to the top of the list.
- Click  to move the group to the bottom of the list.

The remainder of this section describes the entity matching rules that are present in Oracle Financial Services Customer Screening in greater detail.

3.3.2 Prohibition Rules

The Prohibition rules check for country information in an entity's record against the list of prohibited countries and nationalities maintained in List Management.

| Group Code | Matching Rule | Summary of Rule Logic |
|------------|--|---|
| E000A | Country prohibition - Operating country | The country or countries of operation given match at least one prohibited country. |
| E000B | Country prohibition - Registration country | The country or countries of registration given match at least one prohibited country. |

3.3.3 Elimination Rules

| Elimination Rule | Summary of Rule Logic | Enabled by default? |
|---|--|---------------------|
| ELIMINATE WHERE NO COUNTRY SHARED AND ALL SAFE | This rule will eliminate pairs of records if there are no countries in common in the Country fields, AND if all countries listed are on the Safe list. The Safe list is maintained in the Match - Entity Safe Countries ISO Codes Reference Data. | Yes |
| ELIMINATE WHERE CUSTOMER RISK SCORE BELOW THRESHOLD | This rule will eliminate pairs of records if the Customer Risk Score is below a threshold specified in the corresponding screening process. | No |
| ELIMINATE WHERE LIST RISK SCORE BELOW THRESHOLD | This rule will eliminate pairs of records if the List Risk Score is below a threshold specified in the corresponding screening process. | No |
| ELIMINATE WHERE LIST PEP RISK SCORE BELOW THRESHOLD | This rule will eliminate pairs of records if the List PEP Risk Score is below a threshold specified in the corresponding screening process | Yes |

NOTE No elimination rules are enabled by default in Sanctions screening.

3.3.4 Entity Matching Rules

All entity matching rules use a standardized form of the entity name. The strongest rules use the 'part-standardized name', meaning the entity names match after only simple global standardizations (such as considering 'AND', 'and', '&' as the same) are applied. Other rules apply additional rules for standardization as noted in the table below.

NOTE Wherever the term 'word' is used below, this means that there is a space-delimited token in the prepared names.

| Group Code | Name Matching Rule | Summary of Rule Logic | Example Matching Data |
|------------|---|---|----------------------------|
| V010 | Vessel partstandardized name exact | The part-standardized entity name matches the name of a listed vessel exactly. | DYNASTY |
| | | | DYNASTY |
| | | | |
| V020 | Vessel name exact | The entity name matches the name of a listed vessel after number cardinal and ordinal standardization. | 4TH OCEAN |
| | | | FOURTH OCEAN |
| | | | |
| V030 | Vessel partstandardized name with typos | The part-standardized entity name matches the name of a listed vessel with a Character Match Percentage of 80-99%. | RAHIM |
| | | | RAHIM 3 |
| | | | |
| V040 | Vessel name with typos | The entity names match with a Character Match Percentage of 80-99% after number cardinal and ordinal standardization. | RAHUM 3 |
| | | | TRAHIM THREE |
| | | | |
| E010 | Part-standardized name exact | The part-standardized entity name matches a listed entity name exactly. | HUMAN APPEAL INTERNATIONAL |
| | | | HUMAN APPEAL INTERNATIONAL |

| | | | |
|------|---|--|------------------------------------|
| | | | |
| E020 | Name exact | The entity names match exactly after number cardinal and ordinal standardization. | NOVEMBER 17 |
| | | | NOVEMBER SEVENTEEN |
| E030 | Original script name exact | The original script names match exactly. | НИАЭП ОАО |
| | | | НИАЭП ОАО |
| E040 | Name without suffixes exact | The entity names match exactly after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. | CAPITAL DIRECT LTD |
| | | | CAPITAL DIRECT AG |
| E050 | Name without business words similar and sounds like | The entity names match with a Word Match Percentage of 80% after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. | PARAGON UK |
| | | | PARAGON INVESTMENT CORPORATION |
| E060 | Name without business words exact | The entity names match exactly after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. | LIFE HEALTHCARE GROUP HOLDINGS LTD |
| | | | LIFE HEALTH CARE INC |
| E070 | Name without business words has all words out-oforder | All remaining words in each entity name match exactly, but in any order, after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. | EDUCATION FOR HEALTH |
| | | | HEALTH EDUCATION SERVICES |

| | | | |
|------|--|--|---------------------------------------|
| E080 | Name without suffixes 'Starts With' and multiple names in common | The entity names are a 'Starts With' match after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two significant words (not common business words) in common between the two names. The listed name is not an acronym alias of a longer primary entity name. | BAE SYSTEMS (LANCASTER HOUSE) LIMITED |
| | | | BAE SYSTEMS PLC |
| | | | |
| E090 | Name without business words has all words with typos | All remaining words in each entity name match with a Character Match Percentage of 80 or more, after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. | GERBERA ASSOCIATES LTD |
| | | | BERBERA |
| | | | |
| E100 | Original script name in any order | All words in the Original Script Names match exactly, in any order. | ΟΑΟ ΗΙΑΕΠ |
| | | | ΗΙΑΕΠ ΟΑΟ |
| E110 | Original script name with typos | The Original Script Names match with a Character Match Percentage of 80% or more. | Επαναστατική Αριστερά |
| | | | Επαναστατική Αριστερά |
| E120 | Name without business words with typos, and sounds like | The entity names match with a Character Match Percentage of 80 or more after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key and the first three letters of each name are the same. | GOLDSTREAM PROPERTIES LTD |
| | | | GOLDSTEIN PROPERTIES INC |
| | | | |
| E130 | Name without suffixes contains, | The entity names are a 'Contains' match and the Word Edit Distance is no more than one between the names (where each word matches with a | HAMPSHIRE HERITAGE DEVELOPMENTS LTD |

| | | | |
|------|--|---|---|
| | similar and multiple names in common | Character Match Percentage of 80 or more), after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two significant words (not common business words) in common between the two names. | HERITAGE DEVELOPMENT CORPORATION |
| E140 | Name has additional words, sounds like and multiple names in common | All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two significant words (not common business words) in common between the two names. The list name is not an acronym alias of a longer primary entity name. | MOSCOW CITY CENTER PLC MOSCOW CENTER |
| E150 | Name without business words contains, sounds like and multiple names in common | The entity name is a 'Contains' match with a listed entity name, after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There are at least two significant words (not common business words) in common between the two names. The first word of each name has the same 4-character Metaphone key. | HI-TECH RECRUITMENT LTD HI TECH GROUP |
| E160 | Original script name in any order with typos | All words in the original script name match with a Character Match Percentage of 80 or more, in any order. | Μαύρος Σεπτέμβρης Σεπτέμβρης Μαύρος |
| E170 | Name without business words has most words out-oforder | The entity names match (in any order) with a Word Match Percentage of between 75 and 99, | BACK TO HEALTH CLINICS LIMITED BACK TO HEALTH CHIROPRACTIC |

| | Name Matching Rule | after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The list name is not an acronym alias of a longer primary entity name. Summary of Rule Logic | Example Matching Data |
|------|---|---|-----------------------------------|
| E180 | Name without business words, similar, sounds like, with multiple names and a residual token in common | All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There are at least two significant words (not common business words) in common between the two names, and at least one of these is not a word in the English dictionary or a very common word in Watchlist name data. The list name is not an acronym alias of a longer primary entity name. | CHARLES ASH UK LTD |
| | | | CHARLES F ASH CONSTRUCTION CO INC |
| | | | |
| E190 | Name without business words, similar with typos, sounds like, with multiple names and residual token in common. | All words in the shorter entity name match with a Character Match Percentage of 80 or more in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There are at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more, and at least one of these is not a word in the English dictionary or a very common word in Watchlist name data. The list name is not an acronym alias of a longer primary entity name. The group name differs from the rule name. | CLARKS HOME BAKERY LTD |
| | | | CLARK HOMES INC |
| | | | |
| E200 | Name without business words, | All words in the shorter entity name match in the longer entity name (in | AMERICAN MILITARY |

| | | | |
|------|--|--|--|
| | similar, sounds like, and residual token in common | order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The names match with a Word Match Percentage of 50 or more when common business words are not stripped. There are at least two significant words (not common business words) that match. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | SUPPLY AMERICAN SUPPLY CO |
| E210 | Name has additional words tolerant, sounds like and multiple names in common | All words in the shorter entity name match in the longer entity name (in order) with a Character Match Percentage of 80 or more after number cardinal and ordinal standardization. There are at least two significant words (not common business words) in common between the two names. The list name is not an acronym alias of a longer primary entity name. | GENERAL ATOMICS GENERAL BUREAU OF ATOMIC ENERGY GBAE |
| E220 | Name without suffixes contains, similar and residual token in common | The entity names are a 'Contains' match and the Word Edit Distance is no more than one between the names (where each word matches with a Character Match Percentage of 80 or more), after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There is at least one significant word in common (not a common business word, a word in the English dictionary or a very common word in Watchlist name data). | ACCLAIM ACM LTD ACM |
| E230 | Name without suffixes 'Starts With' | The entity names are a 'Starts With' match after number cardinal and ordinal standardization, and after | ENRON METALS BROKERS LTD ENRON CORP |

| | | | |
|------|--|---|-------------------------------------|
| | and residual token in common | common company prefixes and suffixes are removed. There is at least one significant word in common (not a common business word, a word in the English dictionary or a very common word in Watchlist name data). The listed name is not an acronym alias of a longer primary entity name. | |
| E240 | Name without suffixes 'Starts With' and substring in common | The entity names are a 'Starts With' match, and there is a common substring at least 8 characters in length, after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. The listed name is not an acronym alias of a longer primary entity name. | ACCURATE SECTION BENDERS LTD |
| | | | ACCURATE |
| | | | |
| E250 | Name without suffixes contains, residual token in common and significant overlap | The entity names are a 'Contains' match and the Word Match Percentage is 50 or more, after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There is at least one significant word in common (not a common business word, a word in the English dictionary or a very common word in Watchlist name data). | NON EMERGENCY TRANSPORT INC |
| | | | ACTION NON EMERGENCY TRANSPORTATION |
| | | | |
| E260 | Name without common tokens exact, and multiple residual tokens in common | The entity names match exactly, with at least two words matching, after number cardinal and ordinal standardization, and after common company prefixes, suffixes, and other words, and all English dictionary and common Watchlist name words are removed. | LIFE CARE CENTER PUNTA GORDA |
| | | | PORT OF PUNTA GORDA |
| | | | |
| E270 | Original script name has additional names | All words in the shorter original script name match in the longer original script name (in order), and there are at least two matching words. | Въръжена ислямска група |
| | | | Въръжена група |
| | | | |

| | | | |
|-----------------|---|--|-----------------------------|
| E280 | Name without suffixes contains, multiple names in common and significant overlap | The entity names are a 'Contains' match and the Word Match Percentage is 50 or more, after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There is at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more. | CITY TRANS LTD |
| | | | CAPITAL CITY TRANS SERV INC |
| | | | |
| E290 Group Code | Name without business words similar and full name sounds like | The entity names match with a Character Match Percentage of between 80 and 99 after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The names share the same metaphone key after number cardinal and ordinal standardization. | IBERIA AIRLINES |
| | | | IBERAIR LINES |
| E300 | Name without business words similar with typos, sounds like and significant overlap | All words in the shorter entity name match with a Character Match Percentage of 80 or more in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The names match with a Word Match Percentage of 50 or more when common business words are not stripped. There are at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more. The first word of each name has the same 4character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | MED CLINIC LTD |
| | | | MED AMERICA CLINICS INC |
| | | | |
| E310 | | All words in the shorter entity name exist in the longer entity name (in | DJ CASE AND ASSOCIATES INC |

| | | | |
|------|--|---|--|
| | Name has additional words, sounds like and residual token in common | order) after number cardinal and ordinal standardization. There is at least one significant word (not a common business word, an English dictionary word or a word or a common Watchlist name word) in common between the two names. The list name is not an acronym alias of a longer primary entity name. | DJ AND ASSOCIATES INC |
| E320 | Name has additional words with typos, sounds like and residual token in common | All words in the shorter entity name match with a Character Match Percentage of 80 or more in the longer entity name (in order) after number cardinal and ordinal standardization. There is at least one significant word (not a common business word, an English dictionary word or a word or a common Watchlist name word) that matches with a Character Match Percentage of 80 or more. The list name is not an acronym alias of a longer primary entity name. | GARLOCK GARLICK HELICOPTERS INC |
| E330 | Name has additional words, sounds like and substring in common | All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization. There is a common substring of at least 8 characters in length between the two names after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The list name is not an acronym alias of a longer primary entity name. | NATIONWIDE SECRETARIAL SERVICES LTD NATIONWIDE SERVICES |
| E340 | Name without business words, similar, sounds | All words in the shorter entity name match in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other | CENTRAL OKLAHOMA FAMILY MEDICAL CENTER |

| | | | |
|------|---|---|---|
| | like and multiple names in common | words are removed. There are at least two significant words (not common business words) that match. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | CENTRAL MEDICAL INC |
| | | | |
| E350 | Name without business words, similar with typos, sounds like and multiple names in common | All words in the shorter entity name match with a Character Match Percentage of 80 or more in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There are at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | BLACK CHAIR LTD BLACK WORLD COLLEGE OF HAIR DESIGN |
| E360 | Name without business words has typos and sounds like | The entity names match with a Character Match Percentage of between 80 and 99 after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. | BOURNE CHIROPRACTIC LTD BARNO CHIROPRACTIC |
| E370 | Name without suffixes contains with typos and multiple names in common | The entity names are a "Contains" match where each word matches with a Character Match Percentage of 80 or more after number cardinal and ordinal standardization, and after common company prefixes and suffixes are | NEW ORLEANS MEDICAB OF METRO NEW ORLEANS |

| | | | |
|------|---|---|--|
| | | removed. There are at least two significant words (not common business words) that match. | |
| E380 | Name without suffixes contains, similar, and multiple words in common | The entity names are a 'Contains' match and the Word Edit Distance is no more than one between the names (where each word matches with a Character Match Percentage of 80 or more), after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more. | GROSVENOR NURSING SERVICES |
| | | | NURSING SERVICES INC |
| | | | |
| E390 | Original script name has additional names with typos | All words in the shorter original script name match in the longer original script name (in order) with a Character Match Percentage of 80 or more, and there are at least two matching words. | Арабски революционни бригади |
| | | | Арабски революциони |
| E400 | Name has additional words and sounds like | All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization. | ATRIUM INCORPORATORS WORLDWIDE LTD |
| | | | ATRIUM |
| E410 | Name has additional words with typos and sounds like | All words in the shorter entity name match in the longer entity name (in order) with a Character Match Percentage of 80 or more after number cardinal and ordinal standardization. The first word of each name has the same 4-character Metaphone key. | BRILLIANT GENERAL BUILDING CONTRACTOR LTD |
| | | | BRILLIANCE |
| | | | |
| E420 | Name without business words loose match and full name sounds like | The entity names match with a Character Match Percentage of between 60 and 79 after number cardinal and ordinal standardization, and after common company prefixes, | BRC |
| | | | PRC |
| | | | |

| | | | |
|--|--|---|--|
| | | <p>suffixes and other words are removed. The names have the same Metaphone key.</p> | |
|--|--|---|--|

3.3.5 Loose Entity Matching Rules

| Group Code | Name Matching Rule | Summary of Rule Logic | Example Matching Data |
|------------|---|--|---|
| E430 | Name without business words contains, sounds like, and residual token in common | The entity names are a 'Contains' match after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There is at least one significant word (not a common business word, and an English dictionary word or a very common word in Watchlist name data) in common between the two names. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | HENDERSON EQUITY PARTNERS GP LTD |
| | | | HENDERSON MANAGEMENT GROUP INC |
| | | | |
| E440 | Name without business words contains, sounds like, and substring in common | The entity names are a 'Contains' match and there is a common substring at least 8 characters in length after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | HAMILTON NEWS |
| | | | HAMILTON INVESTMENT CORP |
| | | | |
| E450 | Name without suffixes 'Starts With' | The entity names are a 'Starts With' match after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. The list name is not an acronym alias of a longer primary entity name. | JACOB |
| | | | JACOBSON MANAGEMENT CO |
| | | | |

| | | | |
|------|---|--|---------------------------------------|
| E460 | Name without business words has additional words and sounds like | All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | IDEAL SOLUTION ESTATES MANAGEMENT LTD |
| | | | IDEAL ENTERPRISES INC |
| | | | |
| E470 | Name without business words has additional words with typos and sounds like | All words in the shorter entity name match with a Character Match Percentage of 80 or more in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | AVANT GARD LTD |
| | | | AVANTI ENTERPRISES INC |
| | | | |
| E480 | Name without business words contains and sounds like | The entity names are a 'Contains' match after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name. | MOREX TRADING LTD |
| | | | MOREXPRESS SA DE CV |
| | | | |
| E490 | Name without suffixes 'Starts With' and allows acronyms | The entity names are a 'Starts With' match after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. | INTERTRADE CLASSIC LTD |
| | | | INTER |
| | | | |
| E500 | Name without suffixes contains, | The entity names are a 'Contains' match, there are at least two words that match with a Character Match Percentage of 80 or more, | EG ANDG TECHNICAL SERVICES INC |

| | | | |
|------|---|--|--|
| | significant overlap and multiple words in common | and the two entity names match with a Word Match Percentage of 50 or more after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. | TECHNICAL SERVICES |
| E510 | Name contains with typos and multiple words in common | The entity names are a "Contains" match where each word matches with a Character Match Percentage of 80 or more after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two words (not prefixes or suffixes) that match. | FIRSA INTERNATIONAL LTD FIRST INTERNATIONAL COMMERCE BANK LTD |

3.3.6 Ranking matches within Entity Name rules

For each entity or vessel name matching rule, matches are ranked according to how much and how strongly additional data matches between the customer record and the watch list:

| Match Rule | Summary of Matching Logic | Example Matching Data | |
|-----------------------------------|--|-----------------------------------|------------------------|
| [Entity rule], name city, country | At least one city matches. At least one country matches. | City New York London London | Country GB GB US |
| [Entity rule], name city | At least one city matches. | City Paris London | |
| | | Paris | |
| [Entity rule], name country | At least one country matches. | Country US | |

| | | | | |
|-------------------------------|--|----------|---------|--------|
| | | PK IN US | | |
| [Entity name rule] only | The entity name rule returns a match. No data in other fields. | Name | Country | City |
| | | ACM | - | - |
| | | ACM | - | - |
| [Entity name rule] (conflict) | The entity name rule returns a match. Data in other fields do not match. | Name | Country | City |
| | | ACM | UK | London |
| | | ACM | FR | Paris |
| [Vessel name rule] country | At least one country matches. | Country | | |
| | | US | | |
| | | PK IN US | | |
| [Vessel name rule] only | Vessel name rule returns a match. No data in other fields. | Name | Country | City |
| | | Dynasty | - | - |
| | | Dynasty | - | - |
| [Vessel name rule] (conflict) | Vessel name rule returns a match. Data in other fields do not match. | Name | Country | City |
| | | Dynasty | UK | London |
| | | Dynasty | FR | Paris |