# La tecnologia come fattore abilitante per la conformità all’IPR

## SAS Real Time Watch-List Screening

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# Agenda

- Challenges and trends
- Solution Overview
- Video Demo

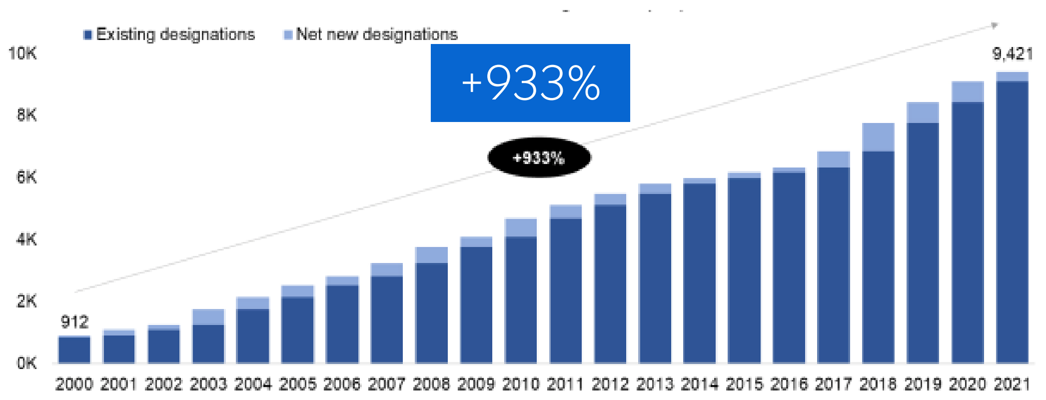
# Challenges and Trends

# Challenges and Trends

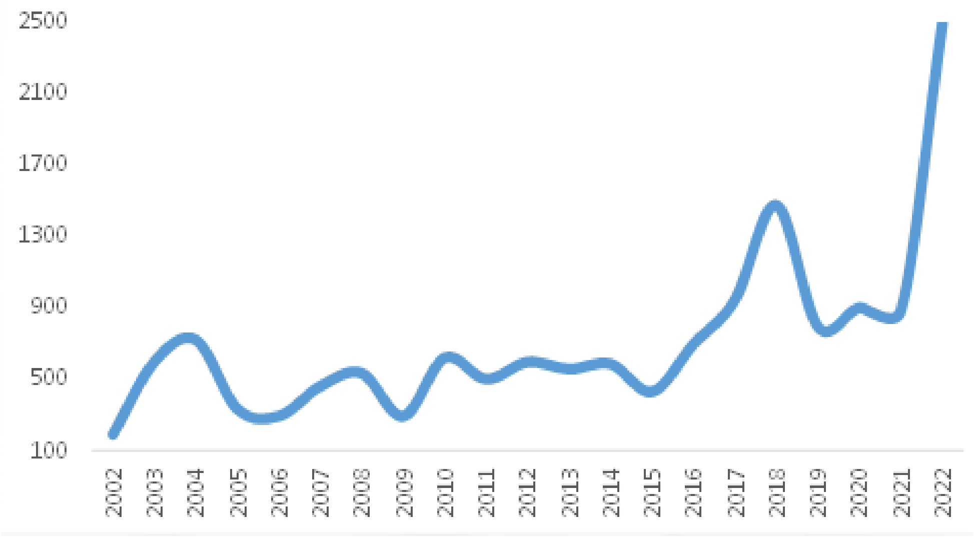
| Challenge | Requirement | Technology Trend |
|---|---|---|
| Growing volumes, geopolitical instability, fast regulatory pace, lack of flexibility | Scalability | Cloud Computing |
| High alert rates, resource requirements and operational costs | Efficiency | Holistic Matching |
| Lack of transparency of models and need to demonstrate understanding of system | Explainability | Glass Box Models |
| Outdated and fragmented industry standard technology | Robust Ecosystem | All of The Above |

# The Need for Scalability

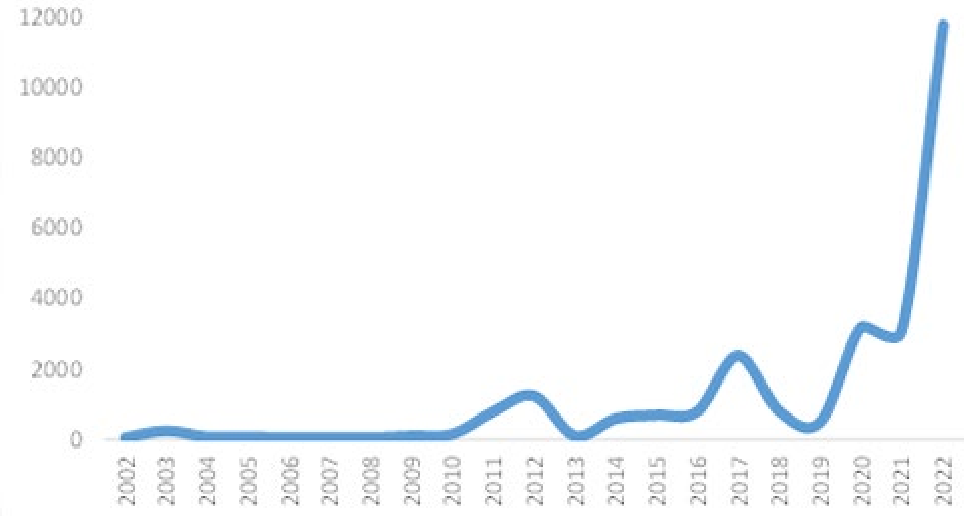
## OFAC Designations




## New OFAC Designations




## New EU Designations




*And it's not just volumes:*

Complexity : new types of sanctions, new measures on export control and sanction circumvention
Pace : Accelerated (e.g since invasion of Ukraine, 19 rounds of EU sanctions)
Flexibility : need for full configurability, instantly, by the end user to adapt to changing situation
Feature evolution and list update process: release/deployment/testing

# EU Evolution Instant Payments Regulation

## Instant Payment Regulation - 9th October 2025 for EURO payments

### Instant credit transfers

Payment service providers (PSPs) that offer the service of sending and receiving credit transfers shall also offer the service of sending and receiving instant credit transfers (Article 5a).

### Equality of charges

Any charges levied by a PSP for sending and receiving instant credit transfers shall not be higher than the charges levied by that PSP in respect of sending and receiving other credit transfers of corresponding type (Article 5b).

### Verification of payee

PSPs shall offer the payer a service ensuring verification of the payee to whom the payer intends to send a credit transfer (Article 5c); this applies to both standard and instant credit transfers. This service shall be offered free of charge to the payer.

### Simplified sanctions screening

PSPs offering instant credit transfers shall verify periodically, and at least daily, whether any of their payment service users are persons or entities subject to targeted financial restrictive measures (Article 5d).

# Simplified Sanctions Screening

## Instant Payment Regulation imposes an immediate rescreening of your PSU

*Article 5d*

**Screening of PSUs by PSPs that offer instant credit transfers to verify whether a PSU is a person or entity subject to targeted financial restrictive measures**

1. PSPs offering instant credit transfers shall verify whether any of their PSUs are persons or entities subject to targeted financial restrictive measures.

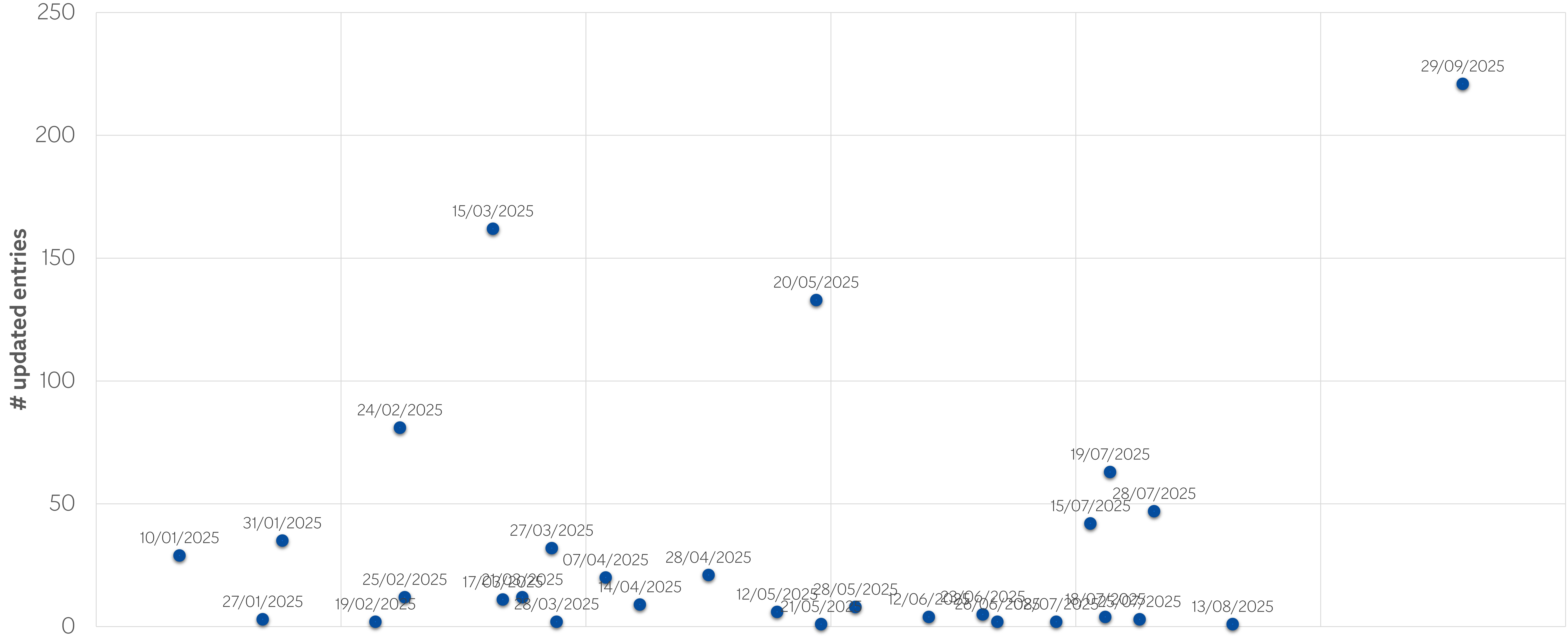
PSPs shall carry out such verifications immediately after the entry into force of any new targeted financial restrictive measures, and immediately after the entry into force of any amendments to such targeted financial restrictive measures, and at least once every calendar day.

2. During the execution of an instant credit transfer, the payer's PSP and the payee's PSP involved in the execution of that instant credit transfer shall not verify whether the payer or the payee whose payment accounts are used for the execution of that instant credit transfer are persons or entities subject to targeted financial restrictive measures in addition to carrying out verifications under paragraph 1 of this Article.

The first subparagraph of this paragraph is without prejudice to actions taken by PSPs in order to comply with restrictive measures, other than targeted financial restrictive measures, adopted in accordance with Article 215 TFEU, with restrictive measures that are not adopted in accordance with Article 215 TFEU, or with Union law on the prevention of money laundering and terrorist financing.

# EU updates in 2025 so far

## 29 updates to the EU list in 2025



# Immediate Screening of EU List: What's the Challenge?

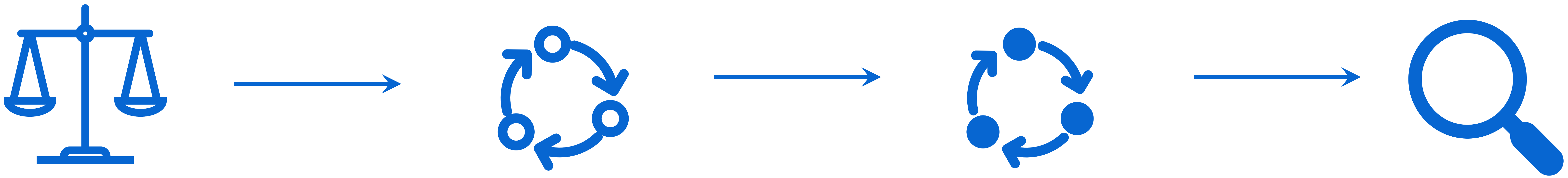
## Lifecycle from official publication to new alert ready for verification

**EU publication**
Unpredictable
Driven by geo-political situation
No warning mechanism available

**List update (list vendor)**
Updates are released on regular schedule (hourly, daily), they are not driven by a one regulator

**List update (your solution)**
Activating a new list feed and propagating it to the live system is time and resource intensive

**Entity rescreening**
Your list of customers is rescreened against the new/modified entries of the EU list



Constant monitoring should occur to cope with unpredictable update events.

Check your list vendor SLA!
If process managed in-house, check *your* SLA!

Load, qualify, activate list in Live environment (disruption).
High operational cost

Launch your rescreening anytime.
Check your scalability and global latency!

"Automagic" List service

Full scalability (cloud based)

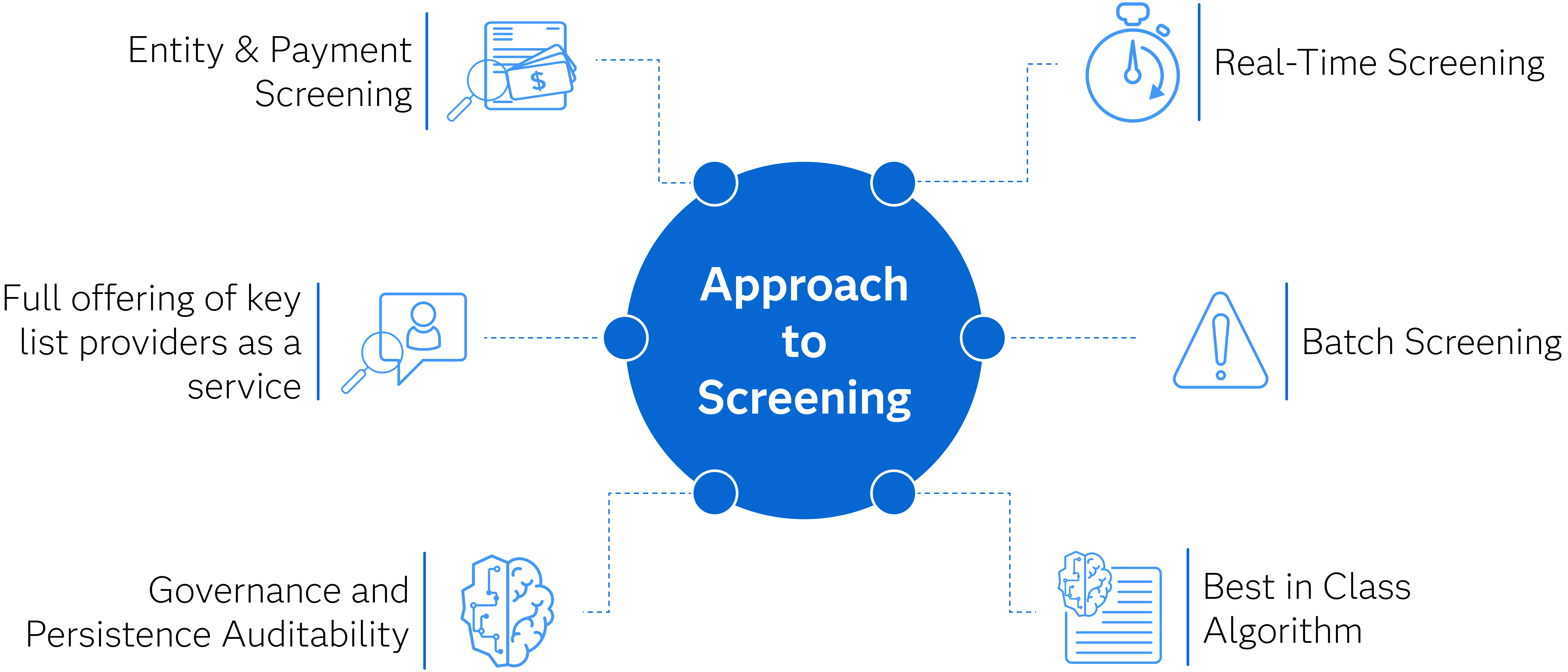
Major list vendor suport with high data quality and short SLA

Accurate and flexible screening configurations

# SAS Real-Time Watchlist Screening Overview

# SAS Real-Time Watchlist Screening

Stay ahead of emerging risks & regulations with a comprehensive screening solution



# SAS Real-Time Watchlist Screening

## Screening for Sanctions, PEP's and Negative News

### RWS-E: Entity Screening

- Structured Customer Records
- Client Onboarding
- KYC/KYB
- Client Monitoring
- Ad-hoc search
- Deny/Allow lists

### RWS-P Payments Screening

- ISO 15022 (MT), ISO 20022 (MX) (SWIFT, SEPA etc.)
- Payments Screening
- Trade/LCs
- Securities

**EFFICIENCY**

Data Orchestration & Enrichment

- Data Parsing, validation and enrichment
- Watchlist Management
- Elastic Scalability

**PRODUCTIVITY**

AI & Advanced Analytics

- Holistic Matching
- Optimal detection AI assisted
- Real-time detection

**TRUST**

Secure & Explainable

- Zero cloud footprint
- Data segregation
- Glass box model

# Evolution of screening technologies

Detect person and entity names in multiple languages and alphabets using fuzzy logic

Fuzzy

**Analyzes non-name data points**

- Geolocation (country, region, city, port, currency…)
- Identifiers (Passport, BIC, IBAN, ISIN, HS code, …)
- Temporal references (dates)

Semantic

Holistic Matching

Alerts

- Provide context (on person/entities, likelihood of alert, priority,…)
- Understand unstructured entities and text (trade, contracts…)
- Use cultural affinity to screen differently name structure depending on the language

AI

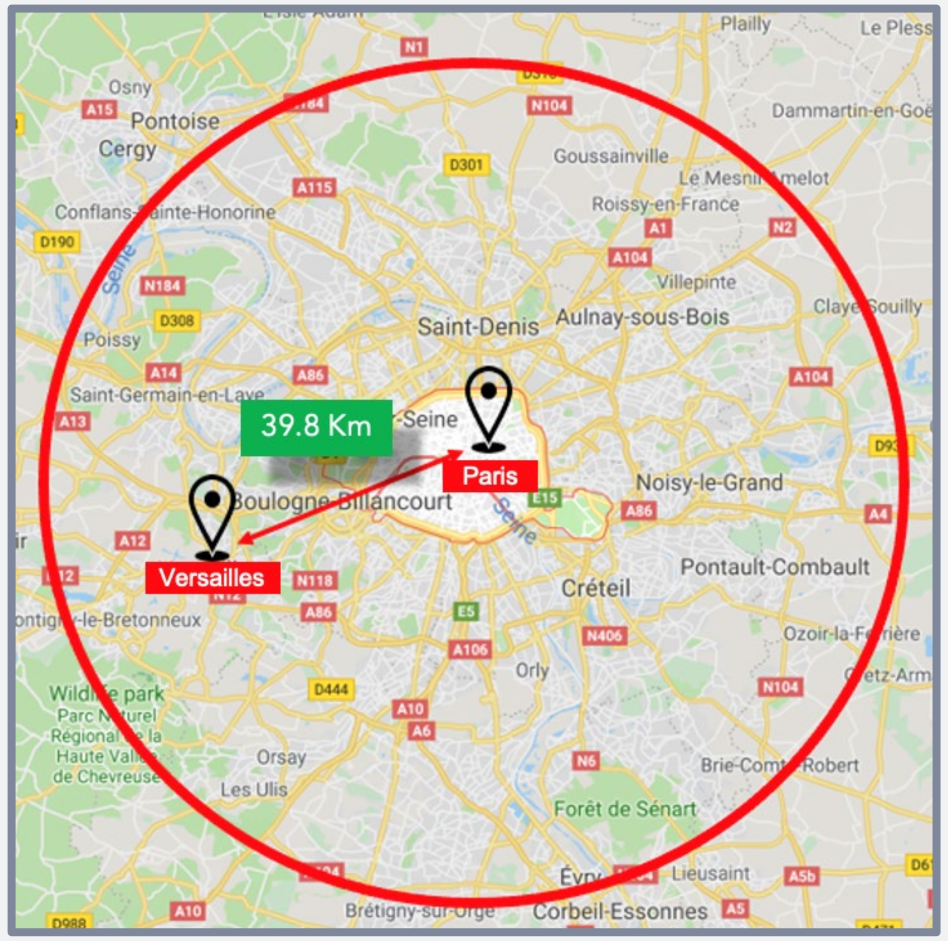
Reference Data

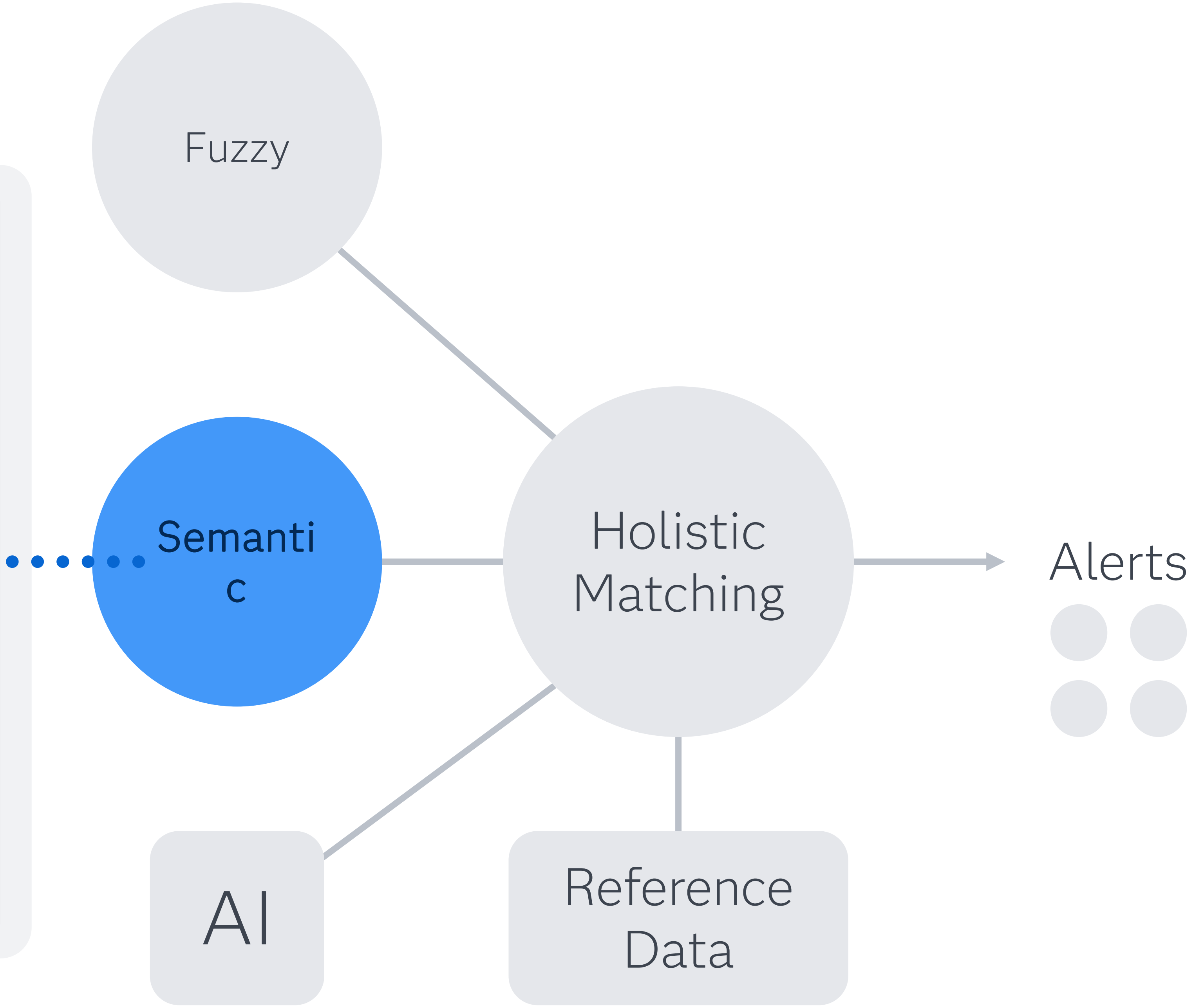
Watchlists
Dictionaries (geo, linguistic,…)
Catalogs (business knowledge)

# How geolocation increases efficiency

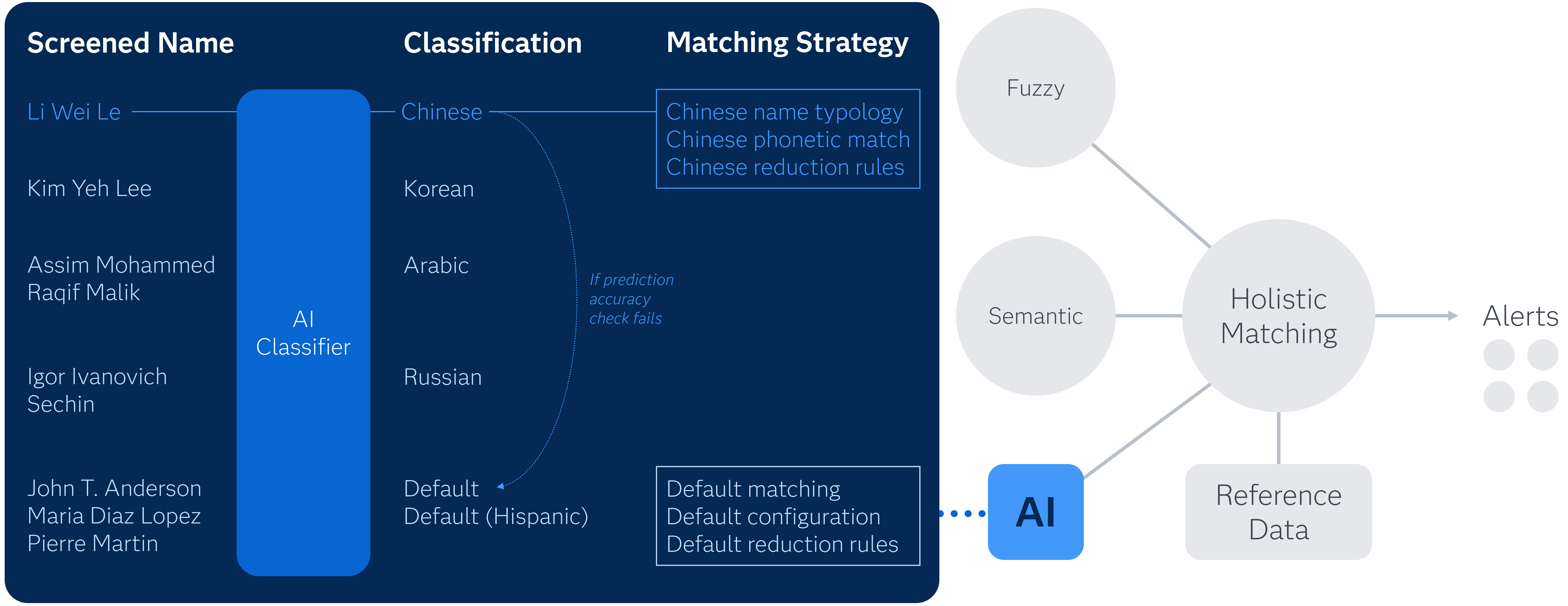
Regions


Cities



# How AI increases efficiency



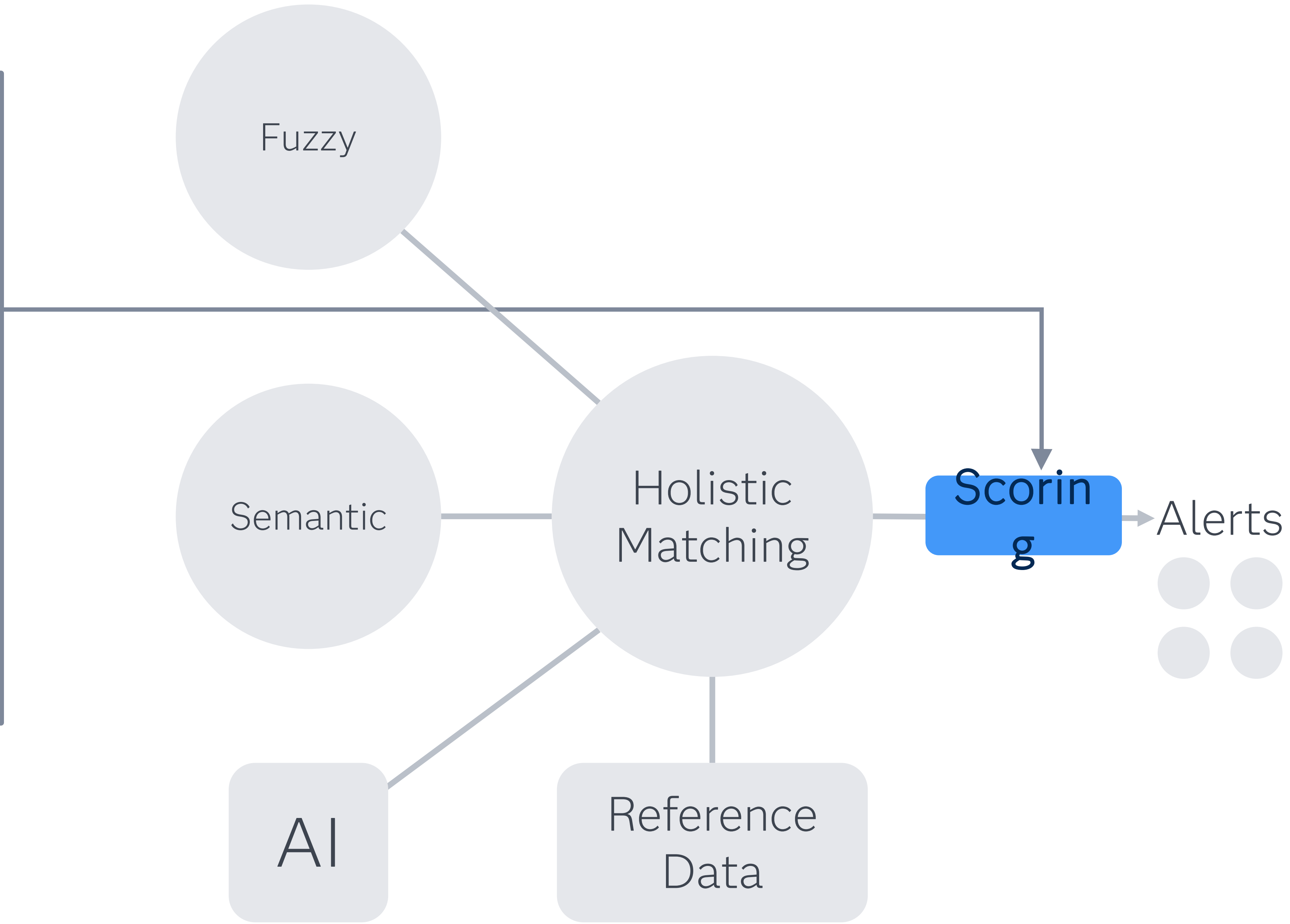
# Scoring with Metascores

Positive impact (bonus points) for matching metadata

- Country ★☆☆☆ Low impact
- Date of Birth ★★☆☆ Medium impact
- City ★★☆☆
- ID ★★★☆ High impact

Negative impact (malus points) for mismatching metadata

- ID ★★☆☆ Low impact
- Date of Birth ★★☆☆ Medium impact
- City ★★★☆ High impact
- Country ★★★★ Very high impact



# Thank you!