THEMIS MLRO Manual

States of Guernsey

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Contents

1 Terms of reference

This document provides the instructions on the usage of the Themis MLRO Portal.

1.1 Change history

Revision	Date	Author	Summary of changes
Draft	13/05/2010	Trish McDonough	None – 1st Draft
1.0	14/05/2010	Trish McDonough	Updates made after initial review
1.1	27/05/2010	Trish McDonough	Update to include Town of Birth field
1.2	15/06/2010	Trish McDonough	Update to include amendments made during UAT testing
1.3	22/06/2010	Trish McDonough	Update to include Account amendments

2 Glossary / Abbreviations

Word	Description
CSV	Comma Separated Values. A file type that can be opened in Microsoft Excel
FIS	Financial Intelligence Service
FLN	Financial Liaison Notice
FSB	Financial Services Business
MLRO	Money Laundering Reporting Officer
PDF	Portable Document Format. A file type that can be opened in Abobe Acrobat Reader

3 Internet Browser Compatibility

The THEMIS MLRO Portal has been optimised for use in the following internet browsers:

- Internet Explorer version 6
- Internet Explorer version 7
- Internet Explorer version 8
- Firefox
- Safari
- Opera

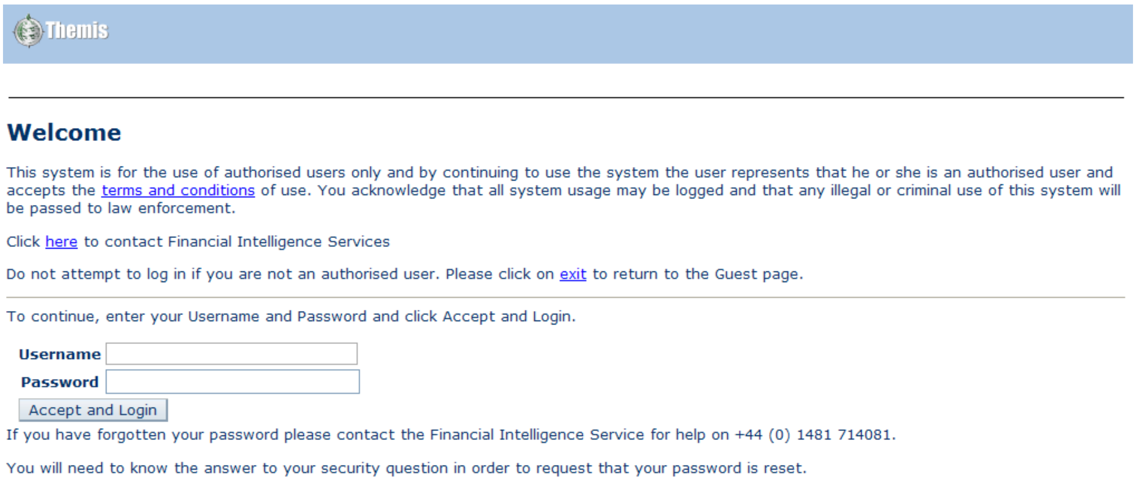
The MLRO Portal will operate successfully in Chrome but may have some cosmetic differences.

4 Login / Logoff

4.1 Login to the MLRO Portal

To login to the THEMIS MLRO Portal a user account and password are required.

When navigating to the THEMIS MLRO Portal the first screen that will appear will be a Welcome screen.


Themis

Welcome

This system is for the use of authorised users only and by continuing to use the system the user represents that he or she is an authorised user and accepts the terms and conditions of use. You acknowledge that all system usage may be logged and that any illegal or criminal use of this system will be passed to law enforcement.

Click here to contact Financial Intelligence Services

Do not attempt to log in if you are not an authorised user. Please click on exit to return to the Guest page.

To continue, enter your Username and Password and click Accept and Login.

Username

Password

Accept and Login

If you have forgotten your password please contact the Financial Intelligence Service for help on +44 (0) 1481 714081.

You will need to know the answer to your security question in order to request that your password is reset.

To view the Terms and Conditions of the MLRO Portal

- Click on the terms and conditions link
- ❖ This will open the system terms and conditions in a popup window.

To contact the Financial Intelligence Service

- Click on the contact Financial Intelligence Service link
- ❖ This will display a screen with a form where a message can be entered for the Financial Intelligence Service.

This form is for general enquires only and not to be used for urgent or confidential matters.

To login to the system

- Enter the correct username in the username field
- Enter the correct password in the password field
- Click Accept and Login

If the login is successful

- The welcome screen will be replaced with another screen.
  - If this is this first time a user has logged into the system or they have not changed their password recently the Change Password screen will be displayed.
  - If the user is representing more than one organisation, the Choose FSB screen will be displayed.
  - Alternatively the MLRO Portal Home page will be displayed.

If invalid credentials are entered

- A Login Failed message will be displayed on the Welcome screen

If the password is entered incorrectly three times then the user account will be suspended.

If it is thought that the correct credentials have been entered and the Login Failed message is displayed the account may be suspended. A FIS administrator will need to be contacted to have the account re-activated.

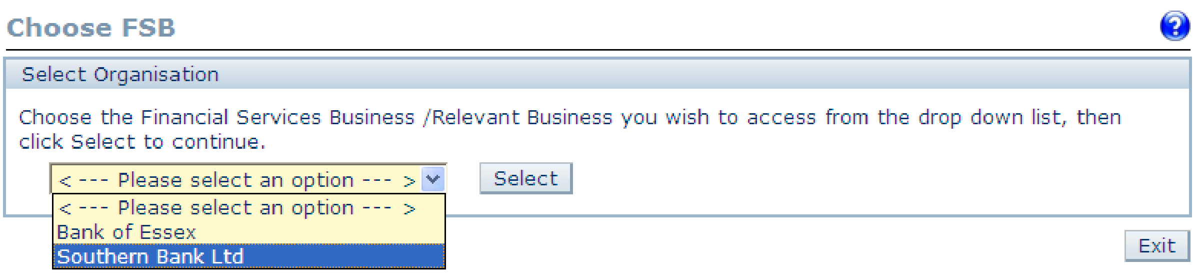
To exit the system without logging in

- Click on the exit link
- This will exit the system and open the Guest screen.

4.1.1 MLRO Representing more than one organisation

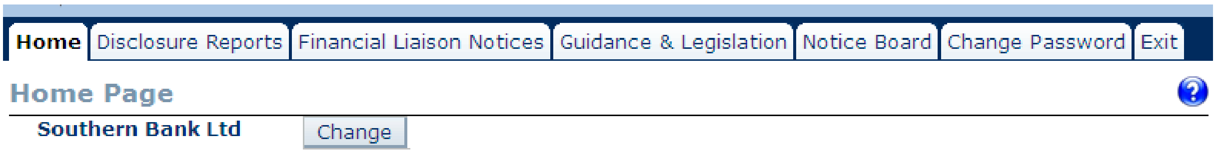
It is possible for one MLRO to represent more than one organisation. If this is the case, once the user has successfully logged in, the Choose FSB screen will be displayed to allow the user to select the organisation they are currently representing.

If a user only represents one organisation this screen will not be displayed.



To select the organisation to represent

- Select the organisation from the dropdown list.
- Click the Select button
- The homepage of the selected organisation will be displayed.



The name of the organisation currently represented will be displayed on the main screens of the site.

It is only possible to view records for one organisation at any given time.

To change the organisation represented

- Click the Change button on the homepage.

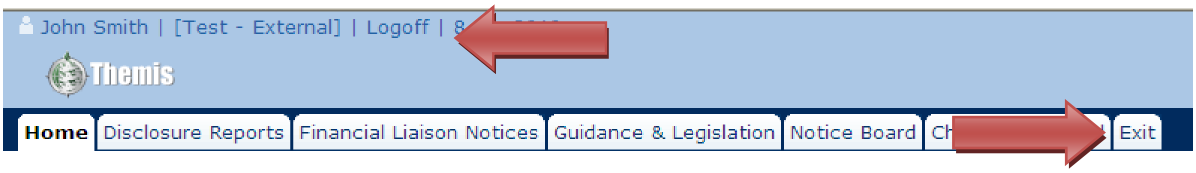
❖ This will return the user to the Choose organisation screen, where they may reselect an organisation.

To exit the system without proceeding

- Click the Exit button

❖ This will display the guest screen of the system.

4.2 Logoff



To logoff the MLRO Portal

- Click on the Logoff link at the top of one of the main screens

  or

- Click the Exit tab from one of the main screens.
- This will log the user off the site and display the guest page.

4.3 Change Password

In the following circumstances a user will not be able to continue to enter the system after logging in until the user's password is changed:

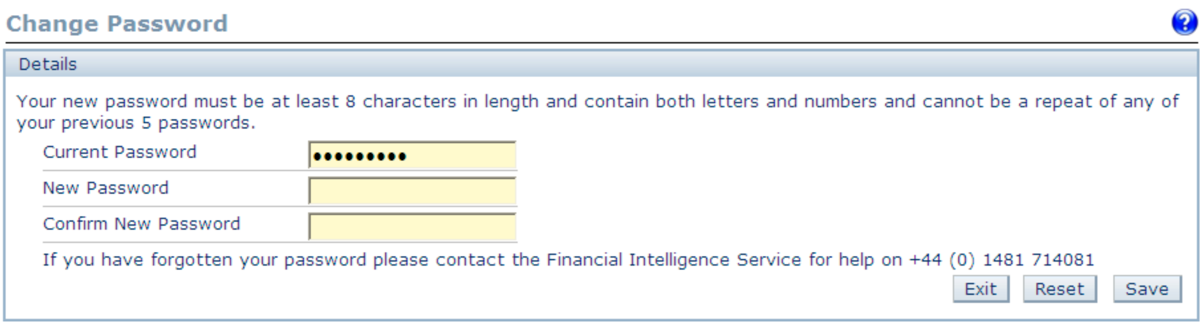
The first time a user logs into the system

The first time a user logs into the system after their password has been reset by FIS

A user logs in and their password has not been changed for a period of time

In these circumstances the Change Password screen will be displayed and it will not be possible to navigate to another area of the MLRO Portal.

The change password screen can also been displayed by clicking the Change Password tab at the top of the main screens, allowing a user to voluntarily change their password. In this case the user is not obliged to change their password and may navigate back to another area of the site.



To change password

- Enter the current password in the current password field
- Enter a new password in the New Password field, repeat the password in the Confirm New Password field.

The new password must be at least 8 characters in length; contain both letters and numbers and cannot be a repeat of any of the previous five passwords.

- Click Save

- Validation will ensure the new password is suitably secure, the current password has been entered correctly and the password entered in the New Password field and Confirm New Password fields are the same. If validation fails an error message will be displayed at the top of the screen. If validation is successful the password will be changed and the Home Page will be displayed.

Clicking Exit on the Change Password screen will exit the MLRO Portal.

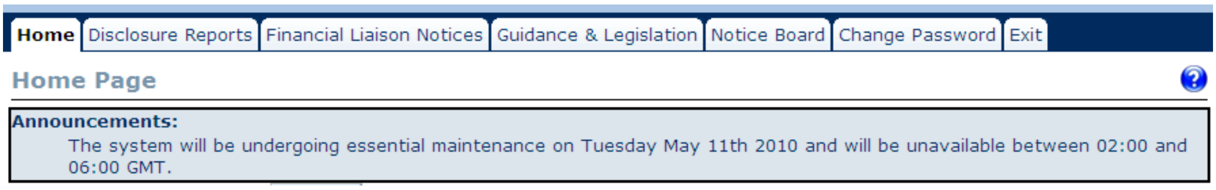
4.4 Timeout

If a user has not carried out any actions for a period of time they will be automatically logged out of the system.

Navigating within the site, clicking tabs and buttons constitute actions; however editing text does not, so it is advisable to Save regularly.

5 Announcements

On occasion FIS may display announcements on the homepage. Announcements will remain until removed by FIS.



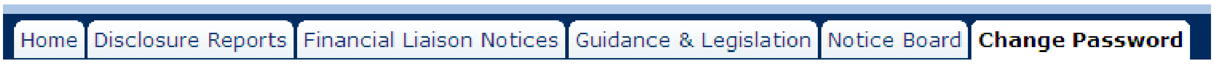
6 Common Functions, Features and Fields

Throughout the system a number of common functions and fields are repeatedly used. These are detailed in the sections below:

6.1 Navigating

After successfully logging in to the MLRO Portal the first screen displayed is the Home Page. From the Home Page it is possible to access the other areas of the site by using the tabs at the top of the screen.

Each of the main areas display tabs to allow navigation between the areas of the site.



The main areas are:

- Home Page
- Disclosure Reports
- Financial Liaison Notices
- Guidance and Legislation
- Notice Board
- Change Password

6.1.1 Exit button

When opening records such as disclosures and subparts of records, such as the details of a subject of a disclosure, the screens displayed have Exit buttons.

The Exit button on a screen will return the user to previous or ‘parent’ screen, until the user returns to one of main areas of the site where the tabs are displayed.

Do not use the browser Back button.

6.2 Help

All screens in the MLRO portal have a blue and white help icon in the top right hand corner of the screen.

To view the help for the screen

Click the Help icon

- A popup window will open displaying further information about the fields and functionality of the screen.

If the user has a popup blocker enabled it may prevent the help window from opening.

To exit the help popup

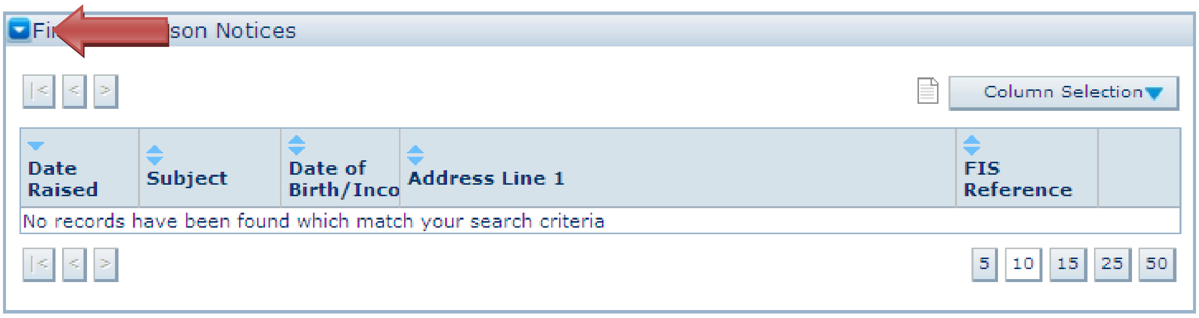
- Click the Close button

6.3 Collapse / Expand Areas

In some parts of the site, data is contained within a pane which can be expanded and collapsed on the screen, for example, search results and criteria.

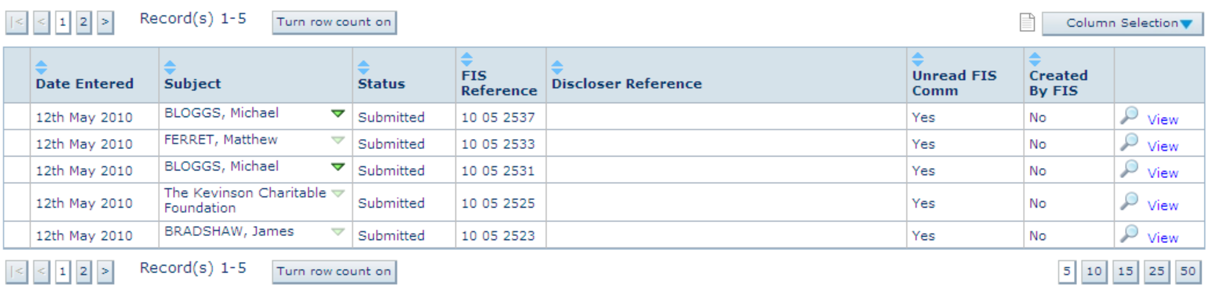
To expand or collapse a pane

- Click the blue and white arrow icon on the left hand side of the title bar.



6.4 Datapagers

Datapagers are used to list records in a table format. Datapagers permit the user to modify the records currently displayed on the screen.



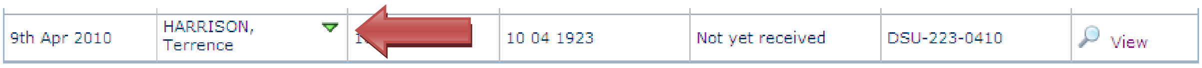
	Date Entered	Subject	Status	FIS Reference	Discloser Reference	Unread FIS Comm	Created By FIS	
	12th May 2010	BLOGGS, Michael	Submitted	10 05 2537		Yes	No	View
	12th May 2010	FERRET, Matthew	Submitted	10 05 2533		Yes	No	View
	12th May 2010	BLOGGS, Michael	Submitted	10 05 2531		Yes	No	View
	12th May 2010	The Kevinson Charitable Foundation	Submitted	10 05 2525		Yes	No	View
	12th May 2010	BRADSHAW, James	Submitted	10 05 2523		Yes	No	View

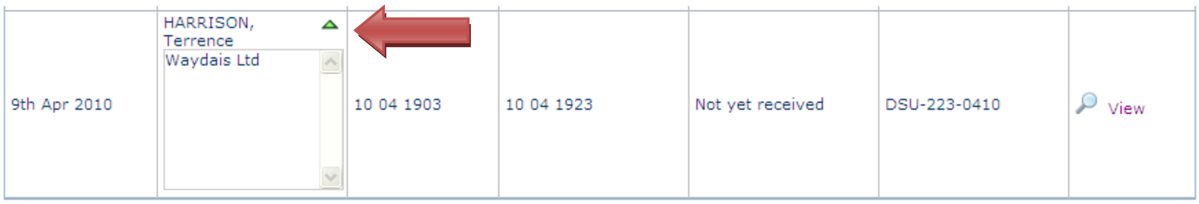
Record(s) 1-5 Turn row count on 5 10 15 25 50

The functionality that is available in datapagers is described in the following sections.

6.4.1 Expand Column

When a Data Pager column contains more than one item, for example the subjects of a Disclosure, only the first item will be listed and a green arrow will appear next to the column.



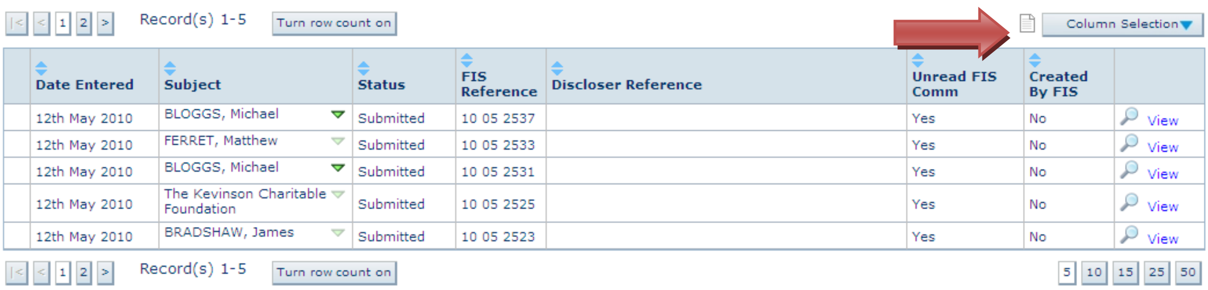


To view or hide additional information

Click the green arrow

❖ The row will expand to show the additional items or collapse to only display the first item.

6.4.2 Export



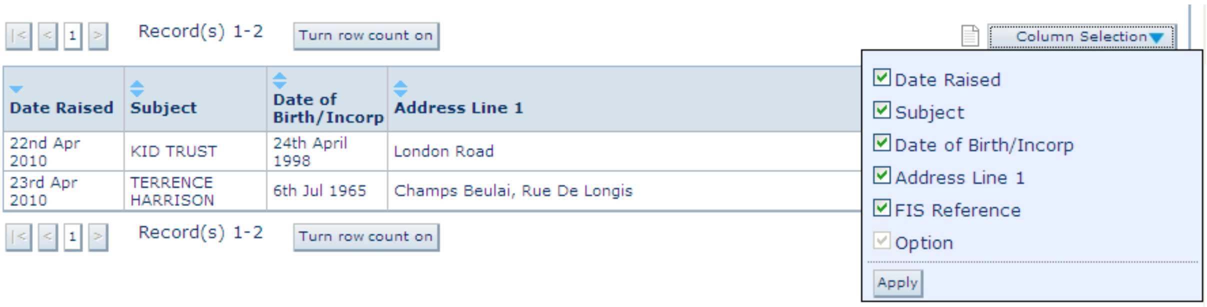
To export the contents of the datapager

Click the export icon at the top right of the datapager

❖ A CSV file will be produced which contains all records in the datapager in the current sort order.

For any records which have expandable column; only the first value in the column will appear in the CSV export.

6.4.3 Column Selection



To modify the columns displayed in a datapager

- Click the Column Selection button in the top right of the datapager
- Select or de-select one of more of the columns
- Click the Apply button
- ❖ The datapager will be updated to only contain the options selected.

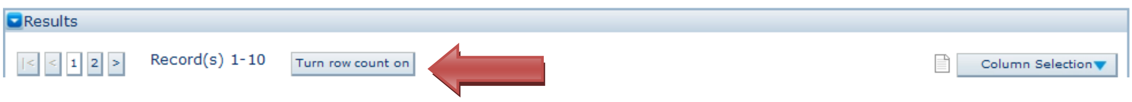
Columns in the Data Pager that contain options, for example, view links or tag boxes cannot be de-selected.

6.4.4 Row Count

By default the number of records is not displayed in the datapager.

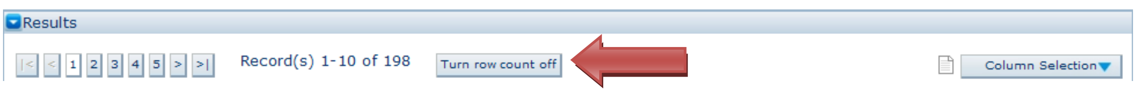
To see the number of records

- Click the Turn Row Count On button.
- ❖ The datapager will update to show the number of records at the top left of the datapager.



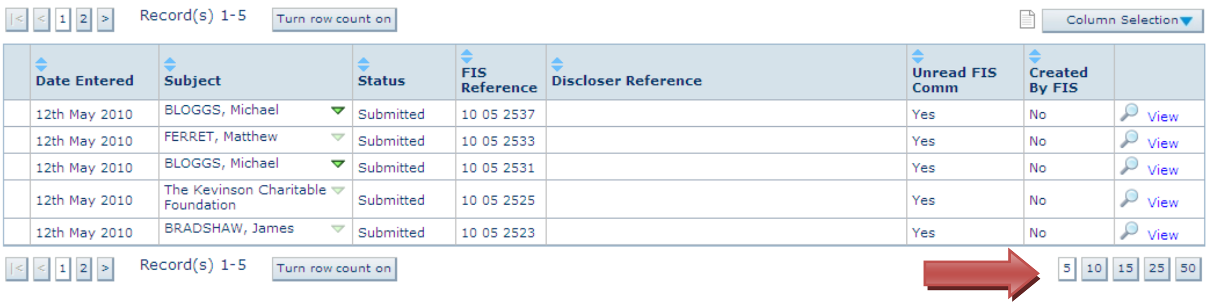
To hide the number of records

- Click the Turn Row Count Off button.
- ❖ The datapager will update and will no longer show the number of records at the top left of the datapager.



6.4.5 Number of Results per page

By default the datapagers in the system will display up to 10 records.

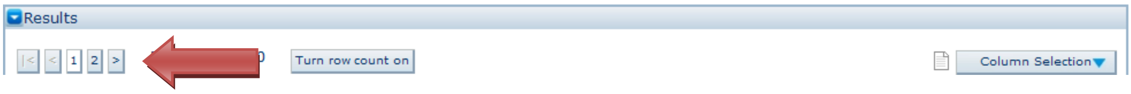


To increase or decrease the number of records displayed on each page

- Click the page size numbers at the bottom right of the datapager.

6.4.6 Paging

If there are more records in the datapager than the current page size, additional pages will be available.



To display the next or previous page of records in a datapager

- Click the next or previous page number at the top or bottom left of the datapager

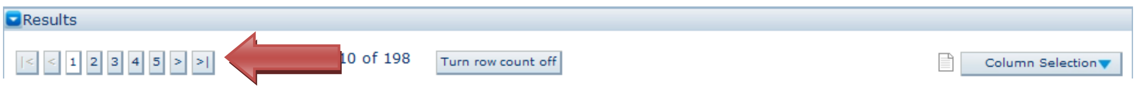
  or

- Click the right arrow (>) or left arrow (<) buttons at the top or bottom left of the datapager

❖ This will change the records displayed to be the records on the next or previous page.

When Row Count is turned off only the next page and previous page will be selectable.

When Row Count is turned on up to five pages will be selectable.



To display a specific page of records in a datapager

- Click the page number required at the top or bottom left of the datapager.

❖ This will change the records displayed to be the records on the page number selected.

To display the first or last page of records in a datapager

- Click the (|<) icon or the (>|) icon at the top or bottom left of the datapager

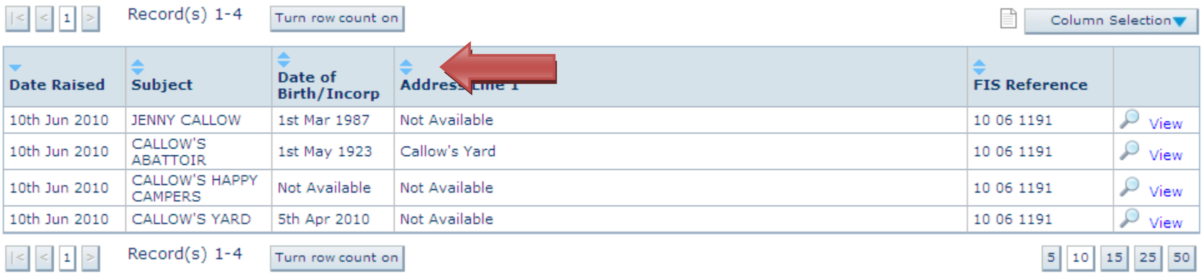
- ❖ This will change the records displayed to be the records on the first or last page.

The last button (>|) option is only available if Row Count is turned on.

6.4.7 Sorting

Columns in Data Pagers that can be sorted have up and down arrows above the column name.

The column that has only one arrow is the one that is currently sorted; in the example below, it is the Date Raised column.



The direction of the arrow indicates the sort order of the column. If the arrow is pointing up then the column is sorted in ascending order. If the arrow is pointing down then the column is sorted in descending order.

To sort the datapager on a currently unsorted column

- Click anywhere in the heading cell of the column

- ❖ The datapager will be sorted on this column in descending order.

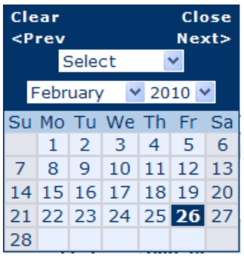
To change the sort order of a sorted column

- Click anywhere in the heading cell a sorted column.

- ❖ The datapager sort order will be reversed.

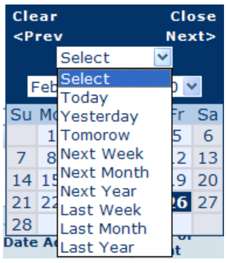
6.5 Entering dates using the calendar

To enter known dates using the calendar function



- Click the calendar icon next to any date field
- The calendar popup will appear and the current month will be displayed
- Navigate to the required date using the <Prev and Next> links or the Month and Year dropdowns.
- Click the date box to select the required date.
- The calendar popup will close and the date clicked will be populated in the date fields on the screen.

To enter relative dates using the calendar function



- Click the calendar icon next to any date field
- The calendar popup will appear and the current month will be displayed
- Select an option from the relative date dropdown, the options are; Today, Yesterday, Tomorrow, Next Week, Next Month, Next Year, Last Week, Last Month and Last Year
- The calendar popup will close and the date field will be populated with the appropriate date.

7 Home Page

The MLRO Portal Home Page is designed to allow instant viewing of items which are in progress or require attention.

The homepage is the first page displayed when the user logs into the MLRO portal for a particular organisation.

The Home page can be accessed once logged in by clicking the Home tab.

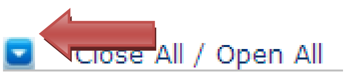
The homepage is split into four areas: Disclosure Report, Consent / Non-Consent, Financial Liaison Notices and Notice Board.

7.1 Expanding and collapsing home page areas

If any of the four areas; Disclosure Report, Consent / Non-Consent, Financial Liaison Notices or Notice Board, do not have records to display, the area pane will be collapsed and just the title bar will be displayed.

To expand a pane or collapse all homepage panes

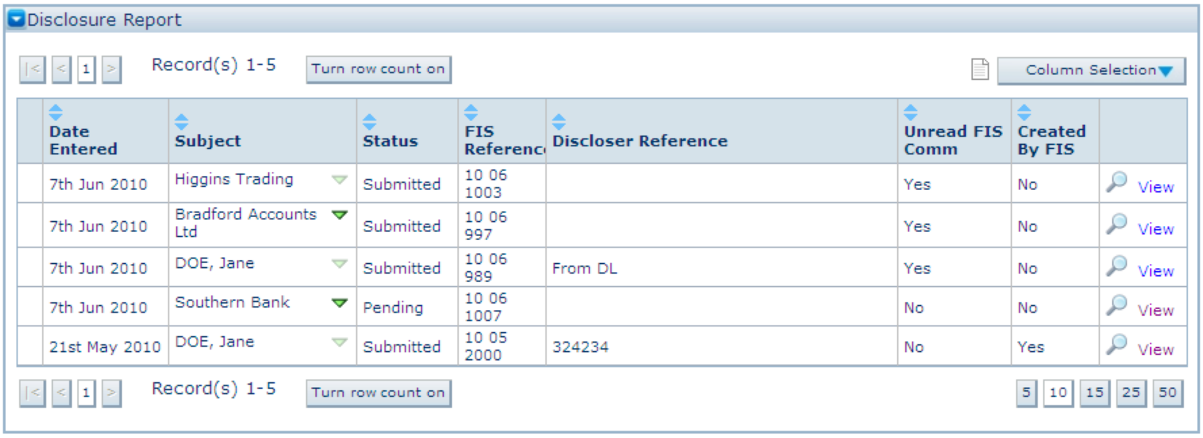
- Click the blue and white arrow icon next to the Close All / Open All text at the top of the homepage.



7.2 Disclosure Report

This area lists all the Disclosures for the represented organisation that meet the following criteria:

- The disclosure has a status of Pending and has not been archived
- The disclosure has been submitted and has a communication from FIS that has not been read yet
- The disclosure has been created by FIS on behalf of the organisation


Disclosure Report

|< < 1 > Record(s) 1-5 Turn row count on Column Selection

Date Entered	Subject	Status	FIS Referenc	Discloser Reference	Unread FIS Comm	Created By FIS	
7th Jun 2010	Higgins Trading	Submitted	10 06 1003		Yes	No	View
7th Jun 2010	Bradford Accounts Ltd	Submitted	10 06 997		Yes	No	View
7th Jun 2010	DOE, Jane	Submitted	10 06 989	From DL	Yes	No	View
7th Jun 2010	Southern Bank	Pending	10 06 1007		No	No	View
21st May 2010	DOE, Jane	Submitted	10 05 2000	324234	No	Yes	View

|< < 1 > Record(s) 1-5 Turn row count on 5 10 15 25 50

The disclosures are initially sorted displaying any with Unread FIS Communications first, followed by those which have a Pending status as they have not yet been submitted to FIS, then Submitted items in descending order of date entered.

To view a disclosure from the home page

Click the View link for the disclosure

❖ For a submitted report this will open the disclosure on the FIS Communication screen.

❖ For a pending report this will open the disclosure on the Subjects screen.

Clicking Exit when viewing a Disclosure Report will display the Disclosure Reports area.

For more information on Disclosure Reports see Section 8.

7.3 Consent / Non-Consent

This area lists all Consent Requests that have been submitted to FIS and meet the following criteria

- The consent request has not yet received a response.
- A response has been received which has not been read by a representative of the organisation.

Consent/ Non-Consent

Record(s) 1-7 Turn row count on Column Selection

Date of Request	Subject	FIS Reference	Consent Request Ref	Date of Response	Discloser Reference	
12th May 2010	COCHRANE, Louise	10 05 2513	10 05 2549	Not yet received	Test extension numbers	View
12th May 2010	ROWLINS, Jenny	10 05 2519	10 05 2547	Not yet received		View
30th Apr 2010	ABC Finance	10 04 2327	10 04 2395	Not yet received		View
22nd Apr 2010	CARVEY, John	10 04 15058	10 04 2235	Not yet received	ABC123/j	View
22nd Apr 2010	HARRISON, Terrence	10 04 1903	10 04 2215	Not yet received	DSU-223-0410	View
15th Apr 2010	ABC Finance	10 04 2045	10 04 2059	12th May 2010	aaaqq11	View
9th Apr 2010	HARRISON, Terrence	10 04 1903	10 04 1923	12th May 2010	DSU-223-0410	View

Record(s) 1-7 Turn row count on 5 10 15 25 50

To view a Consent Request from the home page

Click the View for the consent request

❖ The View Consent Request screen will open.

Clicking Exit when viewing a Consent Request will return the user to the Home page.

For more information on Consent Requests see Section 8.16

7.4 Financial Liaison Notices

This area lists all Financial Liaison Notices that have not been marked as read by the current user.

Financial Liaison Notices

Record(s) 1-2 Turn row count on Column Selection

Date Raised	Subject	Date of Birth/Incorp	Address Line 1	FIS Reference	
12th May 2010	JOHN CARVEY	14th Nov 1980	Heritage Clos, Les Genats Estate	10 04 15058	View
12th May 2010	BLACK ACCOUNTS LTD	1st Apr 2001	High Street	10 04 2073	View

Record(s) 1-2 Turn row count on 5 10 15 25 50

To view a Financial Liaison Notice from the Home page

Click the View link for the Financial Liaison Notice

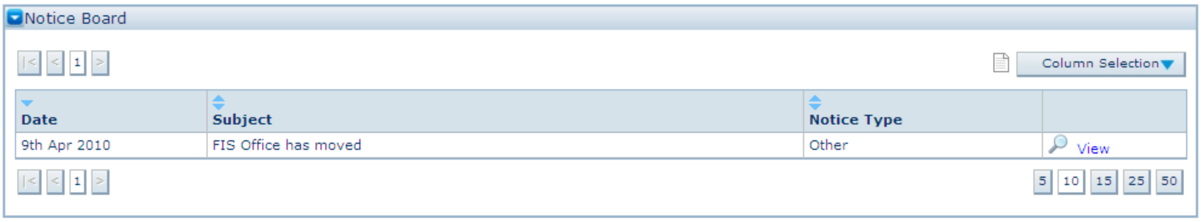
❖ This will open the View Financial Liaison Notice screen.

Clicking Exit when viewing a Financial Liaison Notice will display the Financial Liaison Notices area.

For more information on Financial Liaison Notices see Section 9.

7.5 Notice Board

This area lists all Notices that have not been marked as read by the viewing user.



To view a Notice from the Home page

Click the View link for the Notice

Clicking Exit and Mark as Read when viewing a Notice will display the Notice Board area.

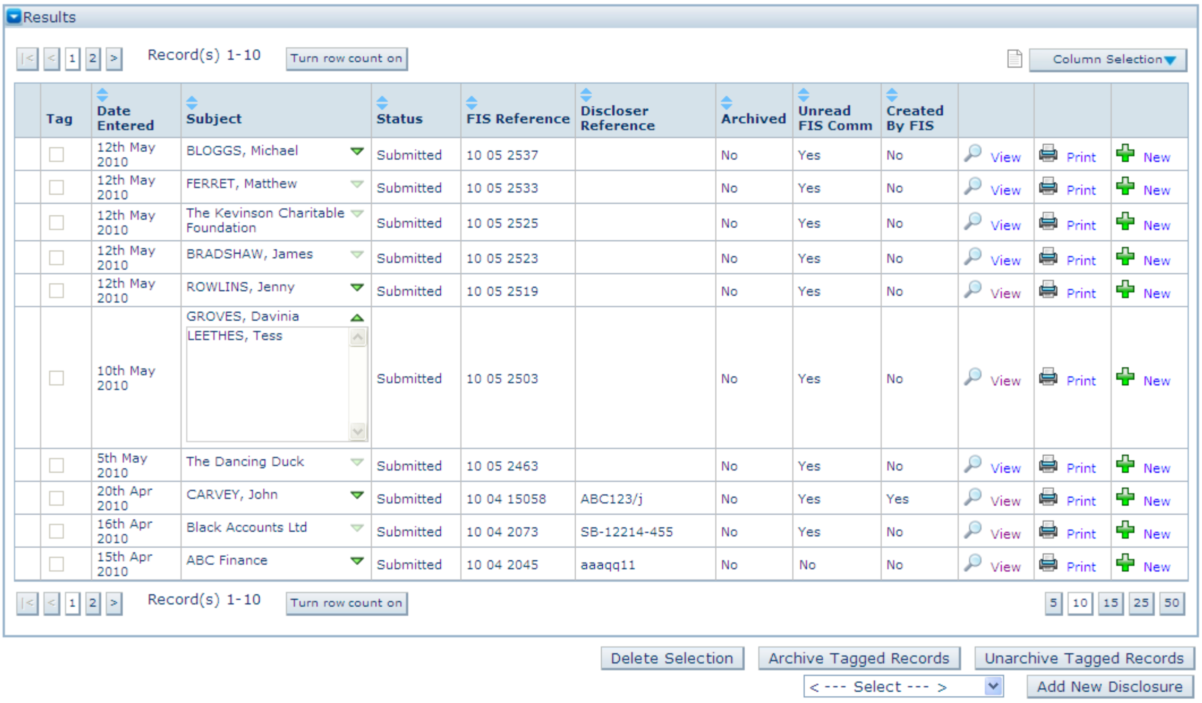
For more information on Notices see Section 11.

8 Disclosure Reports

8.1 Disclosure List

Disclosure Reports can be created, viewed, printed, archived or deleted from the Disclosure List section of the MLRO Portal. The Disclosure List section can be accessed by clicking the Disclosure Reports tab.

The Disclosure List will contain disclosures that were created by the logged in user or other users in the same organisation and disclosures that were created by FIS on behalf of the organisation.



8.2 Disclosure Status

8.2.1 Pending Disclosures

Pending Disclosures are disclosures which have been created by users in the MLRO portal and have not yet been submitted to FIS. Pending disclosures can be edited by any user representing the organisation.

8.2.2 Submitted Disclosures

Submitted Disclosures are disclosures which are visible to FIS. Submitted disclosures have either been created by users in the MLRO portal and have been submitted to FIS or have been created by FIS on behalf of the organisation.

It is only possible to add additional documents, consent requests and further information to Submitted Disclosures. All other fields will be read-only.

8.2.3 Disclosures Created by FIS

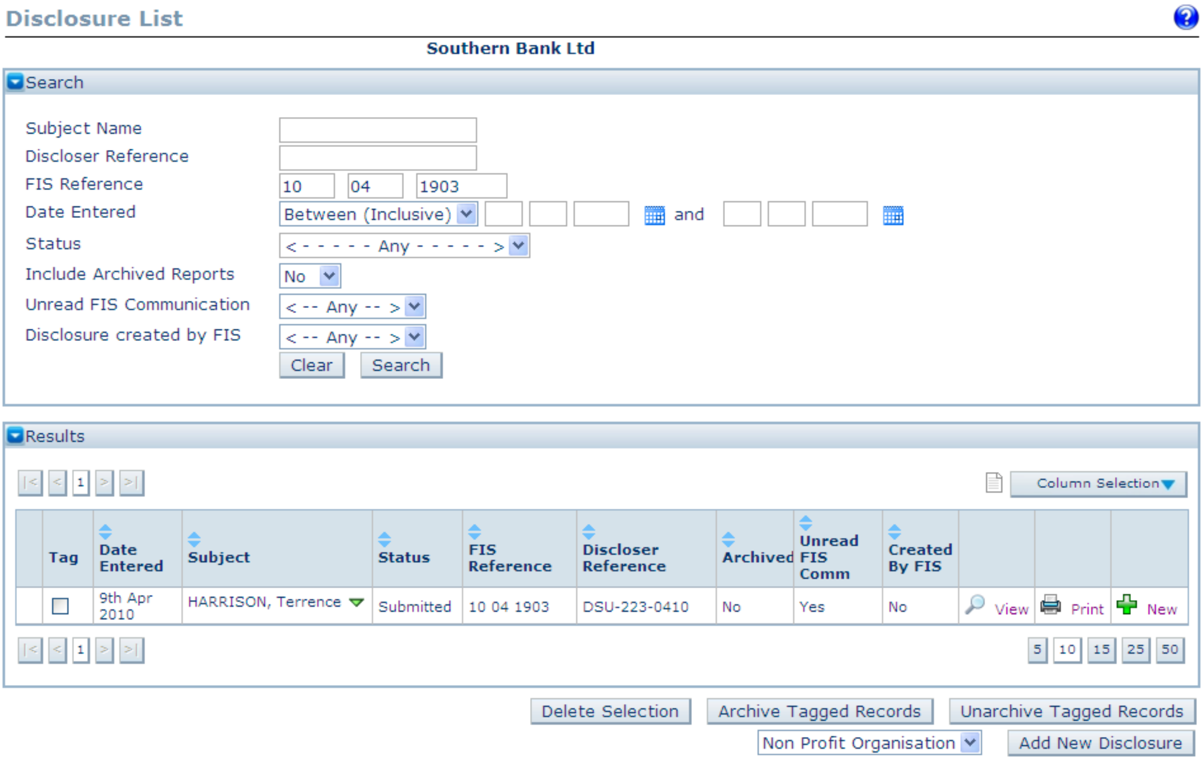
If a disclosure has been created by FIS on behalf of the organisation, it will be displayed in the Disclosure List with a Yes indicator in the Created by FIS column. All disclosures created by FIS will have a submitted status.

8.2.4 Disclosures with Unread FIS Communication

If a disclosure has unread FIS communication, it will be displayed in the Disclosure List with a Yes indicator in the Unread FIS Communication column.

8.3 Searching Disclosures

The disclosures listed in the disclosure list can be filtered or searched using the Search fields at the top of the screen.



The following fields are available to search disclosure reports.

- Subject Name
- Discloser Reference
- FIS Reference
- Date Entered. This can be used to return disclosures entered within specified date ranges as well as on specific dates by using the options provided in the dropdown list.
  - Between (inclusive)
  - On
  - Before
  - On or Before
  - After
  - On or After
- Status
- Include Archived Reports
- Unread FIS Communication
- Disclosure Created by FIS.

To search for a specific disclosure or group of disclosures

Enter the criteria in the Search fields at the top of the page

Click Search

❖ The screen will reload and display any Disclosures which match the entered search criteria in the Disclosure List.

To reset the search

Click Clear

❖ The search criteria will be reset to their default values and the Disclosure List will be reset to display all disclosures.

8.4 Sorting disclosures

The disclosures are initially sorted displaying any with Unread FIS Communications first, followed by those which have a Pending status as they have not yet been submitted to FIS then Submitted items in descending order of date entered.

It is possible to temporarily amend the sort order by clicking the column names on the disclosure list. The disclosure list can be sorted by the following columns.

- Date Entered
- Subject
- Status
- FIS Reference
- Disclosure Reference
- Archived
- Unread FIS Communication
- Created By FIS

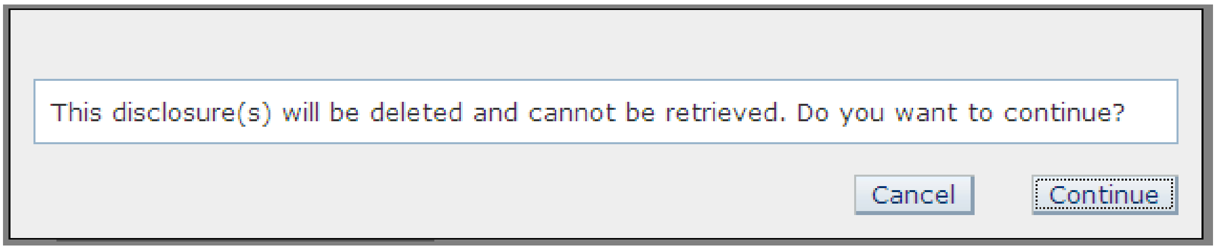
For more information on sorting datapagers see Section 6.4.7 Sorting.

8.5 Deleting Disclosures

It is possible to delete Disclosures which have a Pending status as they have not yet been submitted to FIS. Disclosures which have been entered by FIS or have been submitted to FIS cannot be deleted.

To delete one or more Pending records

- Select the checkbox(es) next to the record(s) in the Disclosure List
- Click the Delete Selection button.
- A message will appear stating "This disclosure(s) will be deleted and cannot be retrieved. Do you want to continue?"



- Click Cancel - will not delete the record and will redisplay the disclosure list with the Disclosures still checked.
- Click Continue - will permanently delete the selected disclosures.

It will not be possible to retrieve deleted disclosures.

8.6 Archiving and Unarchiving Disclosure Reports

Disclosure Reports can be archived so that they are not initially visible on the Disclosure screen. It is necessary to modify the Search Criteria to include Archived Reports to view Disclosures which have been archived.

If new FIS Communication is received for an archived disclosure it will be automatically unarchived.

To archive one or more disclosures

- Select the checkbox(es) next to the records(s)
- Click the Archive Tagged Reports button.
- ❖ The selected reports will set to an archived status

It is not possible to archive records which have communication from FIS which has not been read by the current user.

Archiving a disclosure only affects the visibility of the disclosure on the Disclosure Report screen for the represented organisation. FIS will not be notified that a disclosure has been archived.

To unarchive one or more disclosures

- Select the checkbox next to the record(s)
- Click Unarchive Tagged Reports button.
- ❖ The selected reports will set to an archived status

When a user archives or un-archives a record it will become archived or un-archived for all users of the currently represented organisation, regardless of whether they have any unread FIS communication or not.

8.7 Printing Disclosures

To print an entire disclosure

- Click the Print link next to the disclosure on the Disclosure Reports list.

- This will produce a single file in PDF format containing all the information on the disclosure. The print function in the PDF viewer can then be used to print the Disclosure.

8.8 Viewing Disclosures

To view an existing disclosure

- Click the View link next to the disclosure on the Disclosure Reports list.

- On a submitted report the FIS Communication screen of the disclosure will open.

- On a pending report the Subjects screen of the disclosure will open.

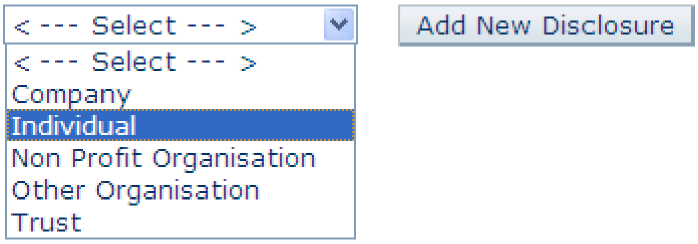
8.9 Creating a New Disclosure

There are three ways to create a new disclosure.

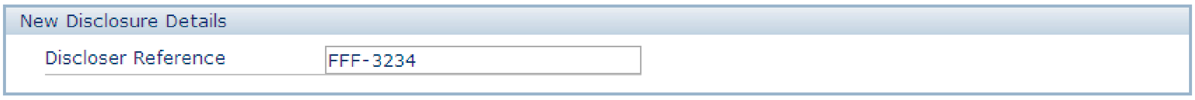
8.9.1 Creating a new disclosure with new subject(s)

This method should be used if a disclosure only concerns subjects which have not been already entered into the MLRO Portal.

At the bottom of the Disclosure Reports screen there is a dropdown list and an Add New Disclosure button.



- Select the type of subject which most closely reflects the primary subject of the disclosure.
- Click Add New Disclosure.
- ❖ This will open the New Disclosure screen for the selected subject type.
- ❖ At the top of the New Disclosure screen there is a Discloser Reference field.



- Use this Discloser Reference field to enter a reference which identifies the disclosure within the represented organisation.
- ❖ The remainder of the screen will contain fields to be completed for the selected subject type.
- Complete the subject details
- Click the Create Disclosure Report button at the bottom of the screen.
- ❖ The new Disclosure report will be created, the subject will be saved and the Subject Details screen will be displayed to allow any further editing of the subject.

8.9.2 Creating a new disclosure from an FLN

A disclosure can be created in response to a Financial Liaison Notice.

Creating a Disclosure in this manner will indicate to FIS that the new disclosure relates to the FLN.

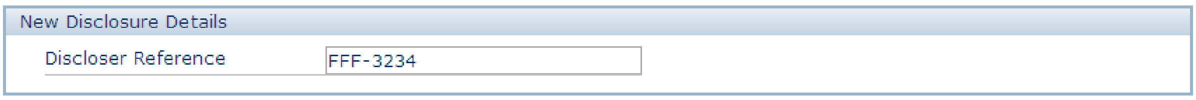
Open the Financial Liaison Notice by clicking the View button either on the Financial Liaison Notices screen or the homepage.

At the bottom of the screen there is a Create Disclosure Report button.

- Click the Create Disclosure Report button.

- This will open the New Disclosure screen.

- At the top of the New Disclosure screen there is a Discloser Reference field.



- Use this Discloser Reference field to enter a reference which identifies the disclosure within the represented organisation.

- The rest of the screen contains the fields applicable to the type of subject the FLN concerned. The name, date of date of birth / incorporation, and address fields will be automatically populated if the details exist in the FLN.

- Add any known additional details of the subject

- Click the Create Disclosure Report button at the bottom of the screen.
- The new Disclosure report will be created, the subject will be saved and the Subject detail screen will be displayed to allow any further editing of the subject.

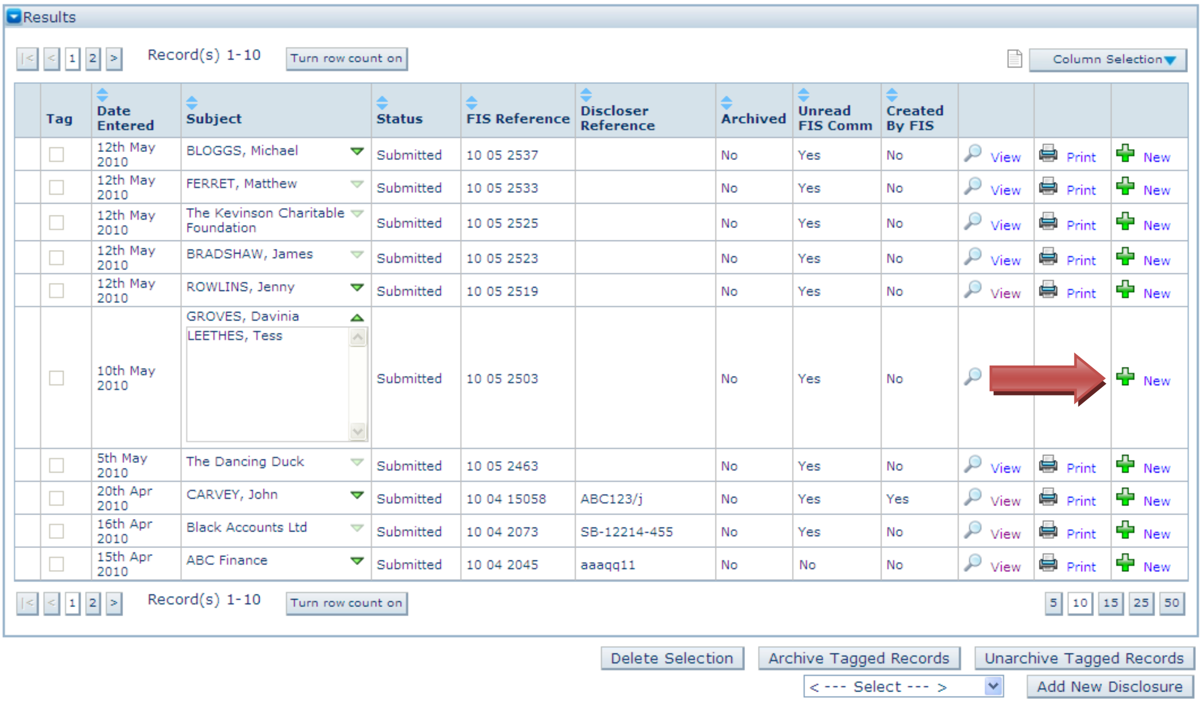
8.9.3 Creating a new disclosure from a previous disclosure

If a new disclosure concerns one or more subjects which have previously been entered on a different disclosure, a new disclosure can be created from the old disclosure to minimise the need to re-enter subject and account information.

Creating a Disclosure in this manner will indicate to FIS that the new disclosure is linked to the old disclosure.

Reusing subjects and accounts this way effectively copies the information; any editing subsequently done on a subject or account will only affect the disclosure which the information was edited on.

- In the Disclosure Reports List, locate the previously created disclosure which shares common subjects
- Click the New link next to the Disclosure.



Results

Record(s) 1-10 Turn row count on Column Selection

Tag	Date Entered	Subject	Status	FIS Reference	Discloser Reference	Archived	Unread FIS Comm	Created By FIS			
	12th May 2010	BLOGGS, Michael	Submitted	10 05 2537		No	Yes	No	View	Print	New
	12th May 2010	FERRET, Matthew	Submitted	10 05 2533		No	Yes	No	View	Print	New
	12th May 2010	The Kevinson Charitable Foundation	Submitted	10 05 2525		No	Yes	No	View	Print	New
	12th May 2010	BRADSHAW, James	Submitted	10 05 2523		No	Yes	No	View	Print	New
	12th May 2010	ROWLINS, Jenny	Submitted	10 05 2519		No	Yes	No	View	Print	New
	10th May 2010	GROVES, Davinia LEETHES, Tess	Submitted	10 05 2503		No	Yes	No			New
	5th May 2010	The Dancing Duck	Submitted	10 05 2463		No	Yes	No	View	Print	New
	20th Apr 2010	CARVEY, John	Submitted	10 04 15058	ABC123/j	No	Yes	Yes	View	Print	New
	16th Apr 2010	Black Accounts Ltd	Submitted	10 04 2073	SB-12214-455	No	Yes	No	View	Print	New
	15th Apr 2010	ABC Finance	Submitted	10 04 2045	aaaqq11	No	No	No	View	Print	New

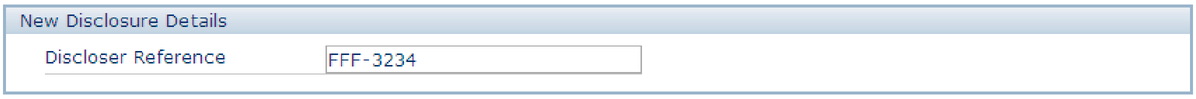
Record(s) 1-10 Turn row count on 5 10 15 25 50

Delete Selection Archive Tagged Records Unarchive Tagged Records

< --- Select --- > Add New Disclosure

8.9.3.1 Previous disclosure has one subject and no accounts

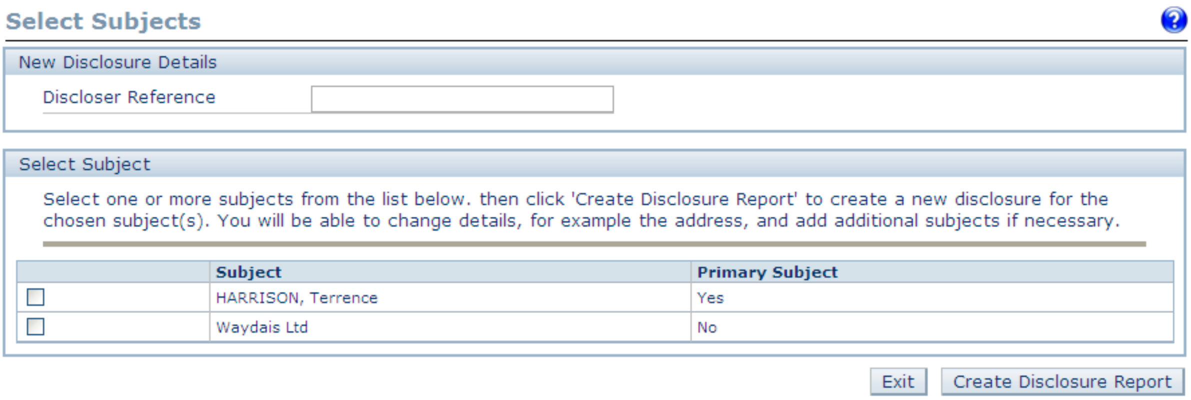
- Where the previous disclosure has only one subject and no accounts the New Disclosure screen will open.
- At the top of the New Disclosure screen there is a Discloser Reference field.



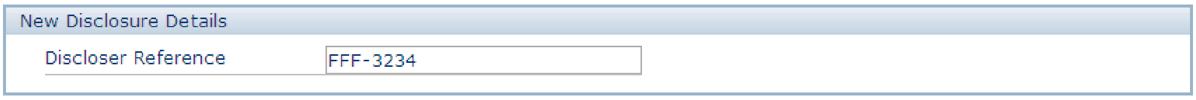
- Use the Discloser Reference field to enter a reference which identifies the disclosure within the represented organisation.
- The rest of the screen contains the details of the subject from the previous disclosure.
- Amend the details if necessary
- Click the Create Disclosure Report button at the bottom of the screen.
- The new Disclosure report will be created, the subject will be saved and the Subject Details screen will be displayed to allow any further editing of the subject.

8.9.3.2 Previous disclosure has multiple subjects and / or multiple accounts

- Where the previous disclosure has two or more subjects and or multiple accounts the Select Subjects / Accounts screen will open.



❖ At the top of the New Disclosure screen there is a Discloser Reference field.



- Use the Discloser Reference field to enter a reference which identifies the disclosure within the represented organisation.

❖ A list of all the subjects on the previous disclosure will be displayed.

❖ For each subject a list of the accounts added for that subject on the previous disclosure will be displayed.

- Select one or more checkboxes to select the subject(s) for the new Disclosure

❖ For each subject selected it will be possible to select any accounts added to the previous disclosure for that subject

- Select any accounts to be added to the new disclosure
- Click the Create Disclosure Report button.

❖ The new Disclosure report will be created and the Subjects List screen will be displayed.

❖ The Accounts and Transactions List will display all accounts selected from the previous disclosure. The details of any transactions and transactions parties from the previous disclosure will be part of the copied accounts.

8.10 Editing a disclosure

There are five sections in a pending disclosure; after the first subject has been created, the sections can be entered and edited in any order.

The sections are:

- Subjects
- Transactions
- Reason for Suspicion and Other Information
- Attachments
- Consent Requests

To navigate between the sections

- Click the tab for the desired section at the top of the screen. The tabs are displayed on the main screen for each section.

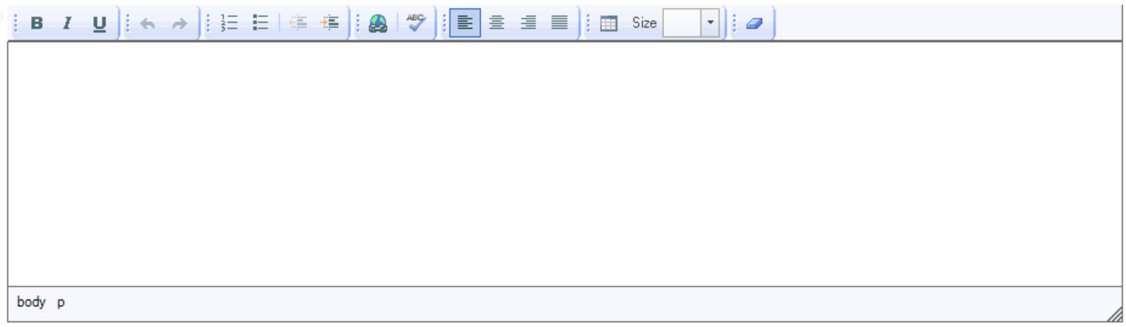
❖ The main screen for the selected section will be displayed. The tab for the section will appear to be in front of the other tabs.

8.10.1 Special Field Types

Within a disclosure there are a number of different types of fields for entering data. Most users will be familiar with boxes for entering text and dropdown lists. The types of field which a user may not be familiar with are explained below.

8.10.1.1 Text Editor

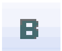
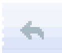
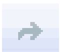
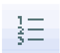
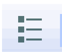
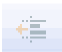
Some fields permit large amounts of text to be entered. These fields have a scrolling free text editor.



If the text entered is larger than the size of the box on the screen, a scroll bar will be displayed on the right hand side to enable the user to scroll through all the text.

The text can be formatted using the icons at the top of the editor.

The table below details the functionality of each of the icons in the text editor

Icon	Details
	Changes selected text to Bold
	Changes selected text to Italic
	Changes selected text to Underlined
	Undo
	Redo
	Changes selected text to be in a numbered list
	Changes selected text to be in a bullet pointed list
	Decreases the Indent of the Text
	Increases the Indent of the Text
	Inserts a link to a website
	Opens spell checker
	Changes selected text to be left aligned
	Changes selected text to be centre aligned
	Changes selected text to justified
	Inserts a table

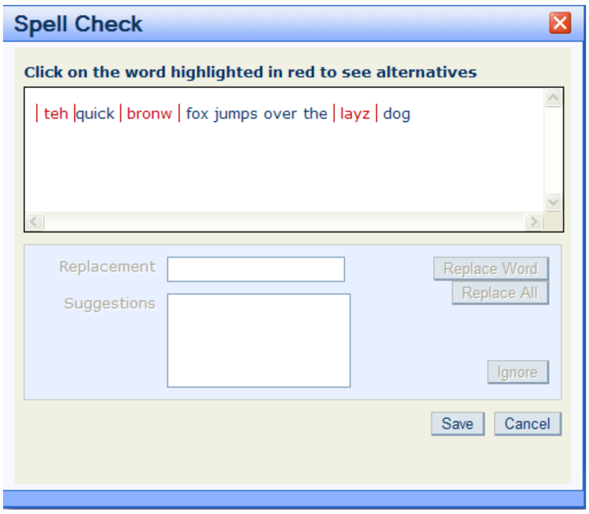
	Changes selected text size
	Removes formatting from the selected text

8.11 Spell Checking

All text editor fields in the system include a spell checker.

To spell check a text editor field

- Click on the Check Spelling icon
- ❖ This will open a screen that lists all recognised spelling mistakes.
- ❖ Words that have been recognised by the system as being spelt incorrectly will be highlighted in red.



To view suggestions for an incorrectly spelt word

- Click the word.
- ❖ The suggestions list will be populated and the colour of the word will change from red to blue.

To replace the incorrectly spelt word

- Select a suggestion from the list

  or

- Type a word into the replacement field
- Click the Replace Word button.

The Replace Word button will not be enabled until a word has been selected or typed into the replacement field.

If an incorrectly spelt word is replaced with another incorrectly spelt word then the new incorrectly spelt word will not be highlighted until the area where the text is displayed has been clicked again.

To save the spelling corrections

- Click the Save button
- ❖ The Spell Checker will close and the text in the text editor will be replaced with the corrected text.

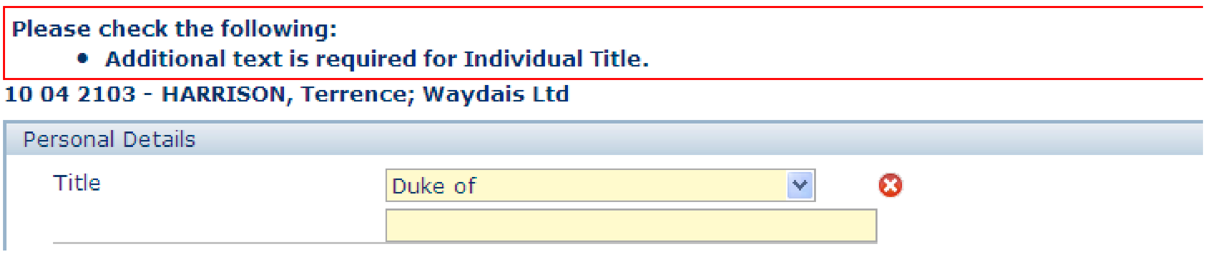
To exit without changing the text

- Click the Cancel button

8.11.1.1 Dropdown lists with additional text

When certain options are selected from a dropdown list, an additional textbox may appear.

This additional field must be completed if the option is selected from the dropdown list. If nothing is entered and Save is clicked a validation message will appear. The screen will not be saved until the field is completed.



8.11.1.2 Multiple Field Groups

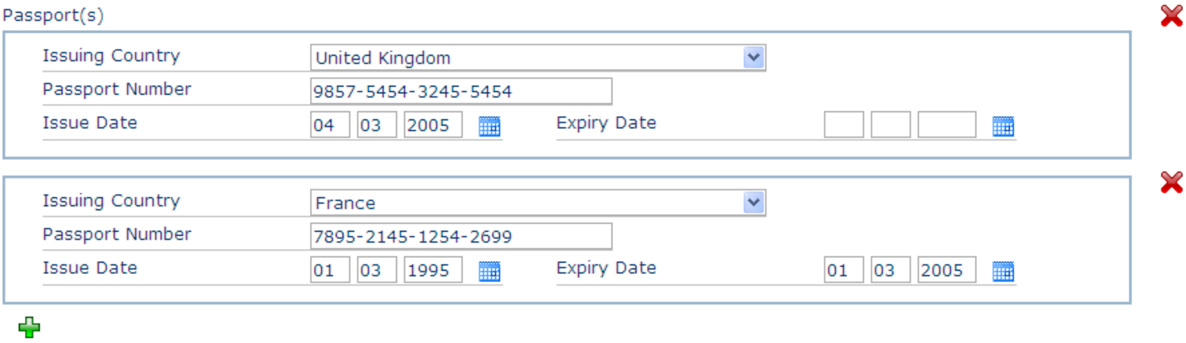
Some subjects may have multiple instances of the same group of fields, for example; multiple addresses or passports.

To add an additional set of fields

Click the green plus icon below the field group.

To remove a set of fields

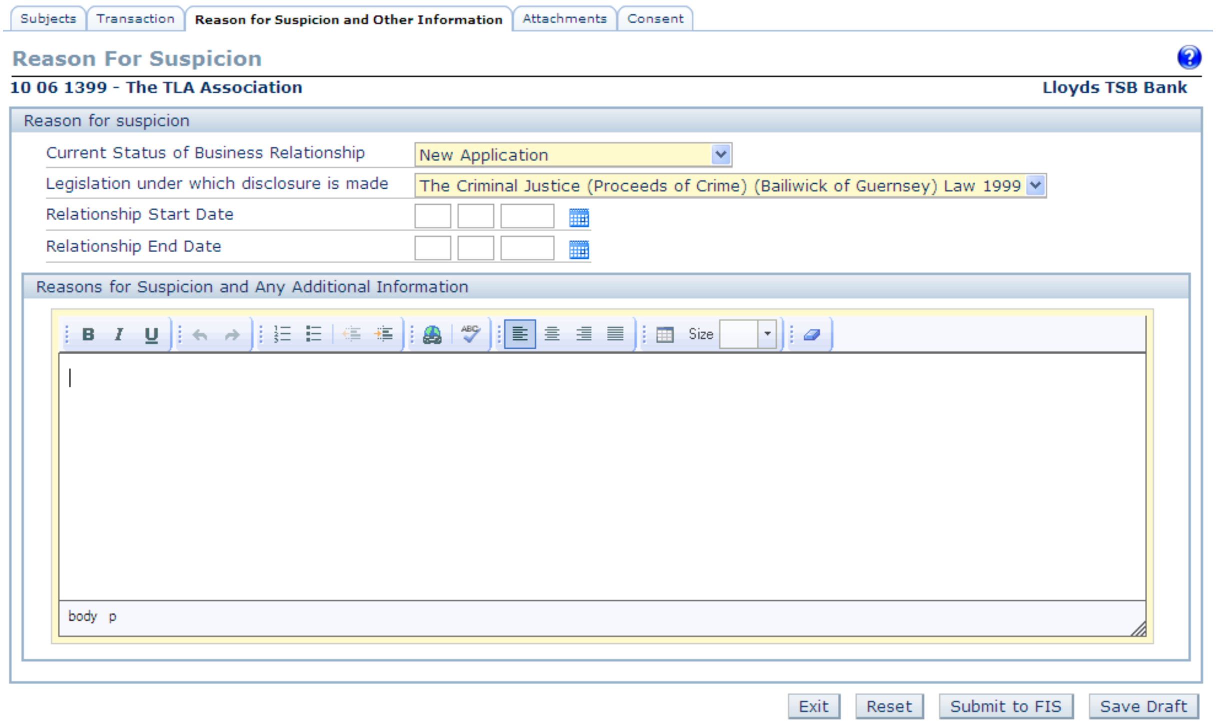
Click the red cross icon next to the field group to be removed.



Additions and removals of field groups will not be permanent until Save has been clicked.

8.11.1.3 Mandatory Fields

Any field which must be completed before a disclosure can be submitted to FIS will appear on the screen with a yellow background.

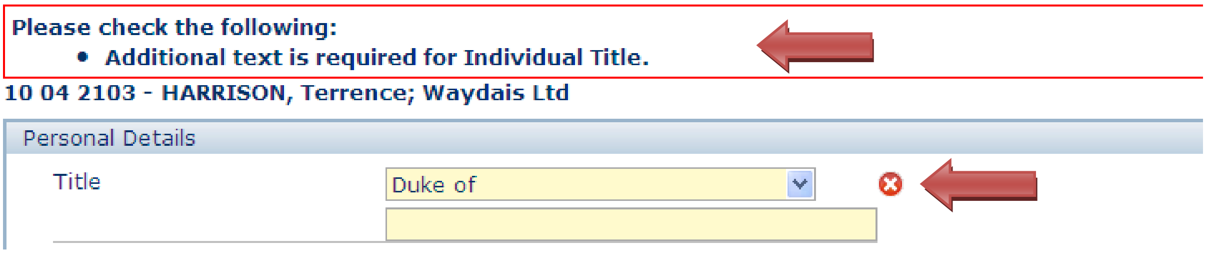


8.11.2 Saving and Submitting a Disclosure

8.11.2.1 Save and Save Draft buttons

To save the details entered on the current screen

- Click Save or Save Draft
- ❖ The fields on the current screen will be validated to ensure they have been entered correctly.
  - ❖ If there are no validation errors the data entered on the screen will be saved.
  - ❖ If any field on the current screen has not been entered correctly a message will appear at the top of the screen to inform the user of the issue. Fields that have failed validation are indicated by a red and white cross icon.



The circumstances when fields may fail validation are:

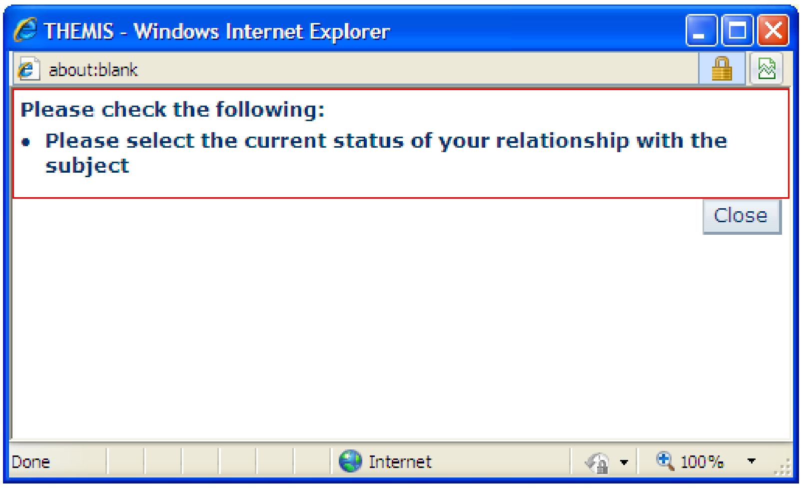
- An invalid date has been entered into the field
- Invalid data has been entered into the field, for example text instead of numbers have been entered into a length or value field
- The order of from and to dates is invalid, for example, the from date has been entered as later than the to date
- Not all components have been entered, for example, an address has been entered but not an address type.
- A dropdown list selection requires additional text to be entered and no additional text has been entered

If there are any validation errors the data on the screen will not be saved; to save the entered data it is necessary to rectify the errors and click Save or Save Draft again.

8.11.2.2 Submit to FIS button

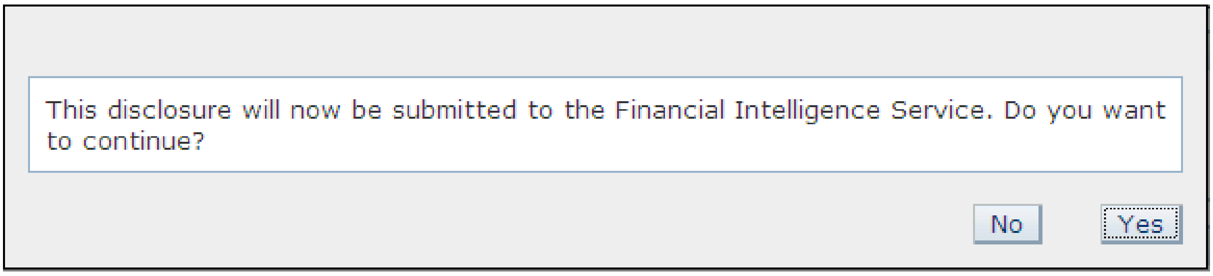
To submit a disclosure to FIS

- Click the Submit to FIS button
- ❖ The fields on the current screen will be validated to ensure they have been entered correctly and all the mandatory fields within the disclosure have been completed.
  - ❖ If there are any validation errors an error message will appear at the top of the screen to inform the user of the issue(s). An additional popup window will appear listing the validation errors; this is to assist the user by providing a list of the issues, which they can refer to as they visit different areas within the disclosure to rectify the errors.



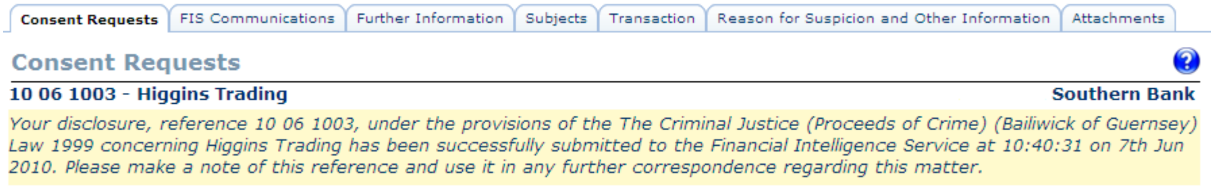
If Submit to FIS is clicked and the disclosure failed validation any data entered on the current screen will not be saved; if all the errors are not on the current screen it will be necessary to click Save Draft before navigating to a different area of the disclosure.

- ❖ If there are no validation errors the data entered will be saved and a message will appear asking for confirmation to submit the disclosure to FIS.



- Click No to continue editing the disclosure.
- Click Yes to submit the disclosure to FIS.

- Once the disclosure has been submitted the Consent Request screen of the disclosure will be displayed with a confirmation message.



8.11.3 Reset

All screens which have fields where data can be entered and saved also have a Reset button.

When the Reset button is clicked the details on the screen will be reset to the values they were the last time the record was saved.

When the Reset button is clicked a message will be displayed to the user informing them that if they continue then any changes will be lost. The user will have the option to click Cancel and continue editing or click OK and discard the changes.

8.11.4 Exit

When the Exit button is clicked on a screen when details have been entered and not saved a message will be displayed to the user informing them that if they continue then any changes will be lost.

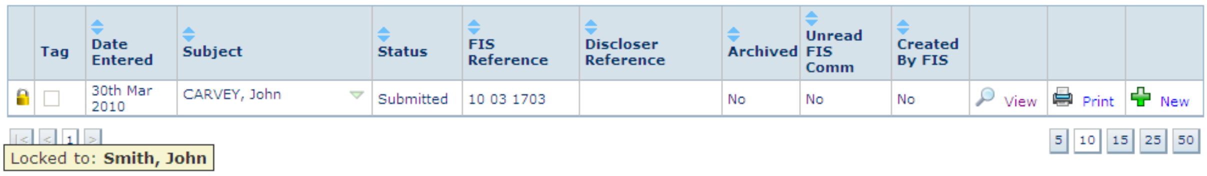
The user will have the option to click Cancel and continue editing or click OK and discard the changes.

The Exit button will close the record or part of the record. If the button is used to exit the disclosure it will unlock the disclosure to allow other users to edit it.

8.11.5 Record Locking

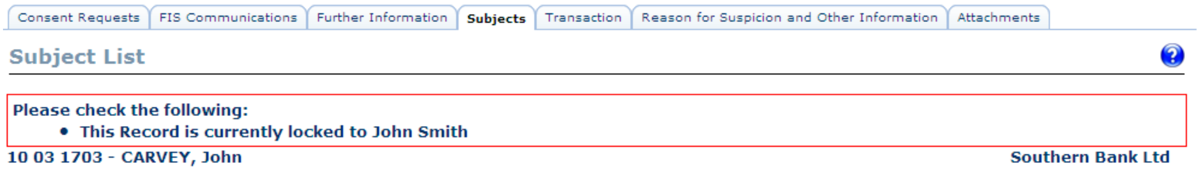
To prevent two users from editing the same disclosure and overwriting each other's changes the system uses record locking functionality.

In the search results screens if a record is locked, a padlock icon will appear next to the record. Hovering over the icon will display the name of the user that has locked the record.



If a record is locked to a user, other users can view the record but all editing features will be disabled.

When viewing a locked record a message will appear at the top of the screen to inform the user the record is locked and indicate whom it is locked to.



To release the lock on a record the user must use the Exit button to exit the record. If the user does not use the Exit button the record will remain locked.

If a record is accidentally left locked, then the record will be automatically unlocked after a set period of time after the last action was carried out.

8.12 Subjects

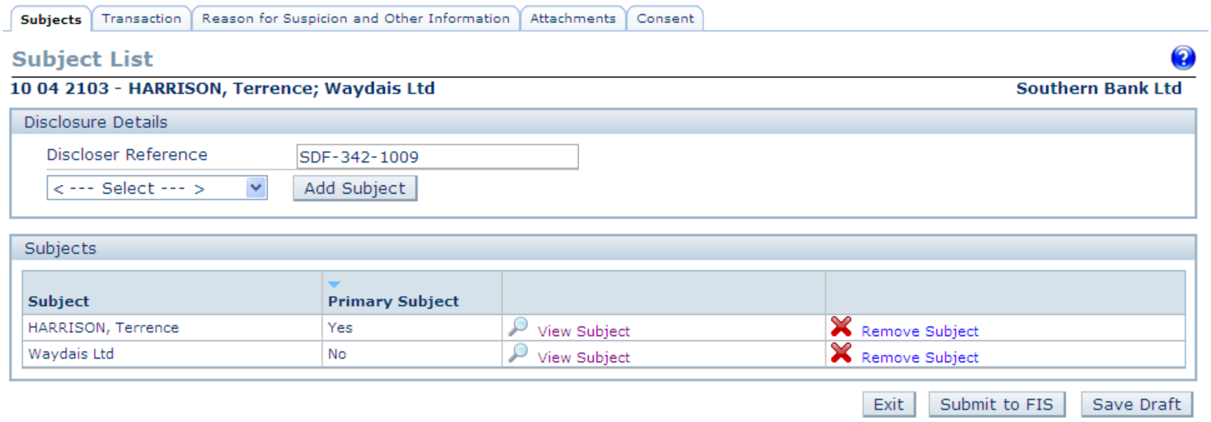
Subjects are divided into five types; one individual subject type and four organisation subject types.

The type of subject will determine the fields available for completion.

One disclosure can contain multiple subjects of different types.

8.12.1 Subject List

All subjects of a disclosure will be listed in the datapager on the Subjects screen of the disclosure.



8.12.2 Add a New Subject

A new subject can be added to the existing disclosure from the Subjects List screen.

- From the dropdown list select the type of subject to be added.
- Click the Add Subject button
- ❖ This will open a new subject screen for the selected subject type.
- Enter the details of the new subject
- Click the Save button at the bottom of the screen
- ❖ This will save the subject and add it to the disclosure.

After all editing has been completed click the Exit button to return to the Subjects List screen where the new subject will be listed.

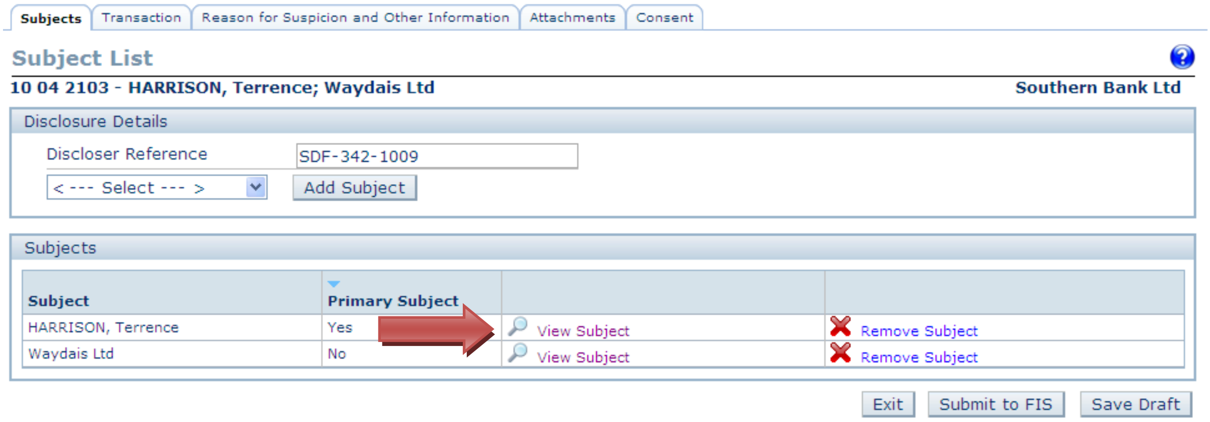
To cancel the adding of the new subject

- Click the Exit button at the bottom of the screen before saving the subject.
- ❖ This will display the Subjects List screen, no new subject will be added.

8.12.3 View or Edit an existing subject

On the Subjects list screen

- Locate the existing subject to be viewed or edited
- Click the View Subject link.



- This will open the subject details screen.
- If required, edit the subject.
- Click Save to save any changes

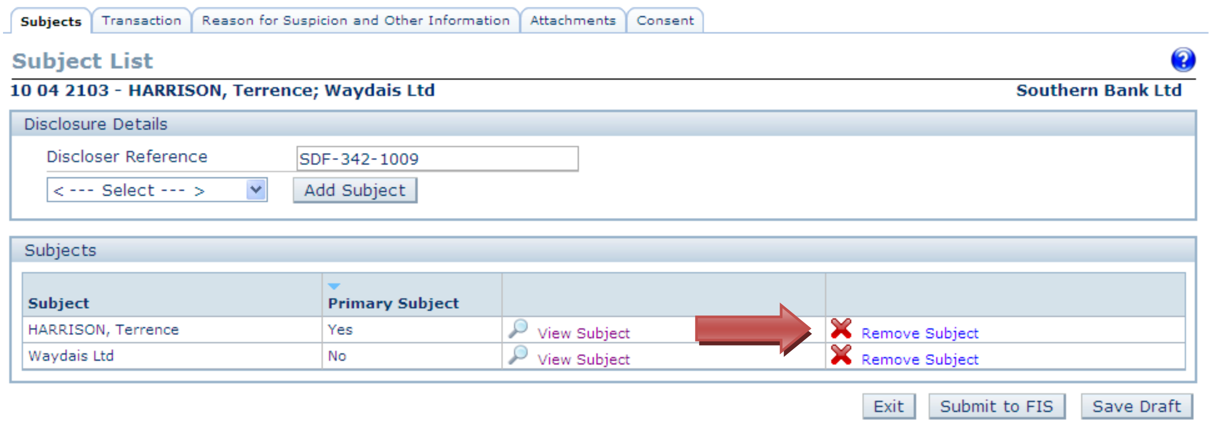
To exit the subject details screen

- Click the Exit button at the bottom of the screen

8.12.4 Removing a subject

On the Subjects list screen

- Locate the subject to be removed
- Click the Remove Subject link.



- A message will appear asking for confirmation of the delete.
- Click OK to permanently remove the details of the subject, any accounts belonging to the subject and their role as a party in any transactions.
- Click Cancel to display the subject details screen without removing the subject.

8.12.5 Individual Subject Details

8.12.5.1 Personal Details

The following fields are available for completion of an individual's personal details.

- Title
- Forename or Initials
- Surname
- Date of Birth or Estimated Age
- Gender
- Place Of Birth
- Town Of Birth

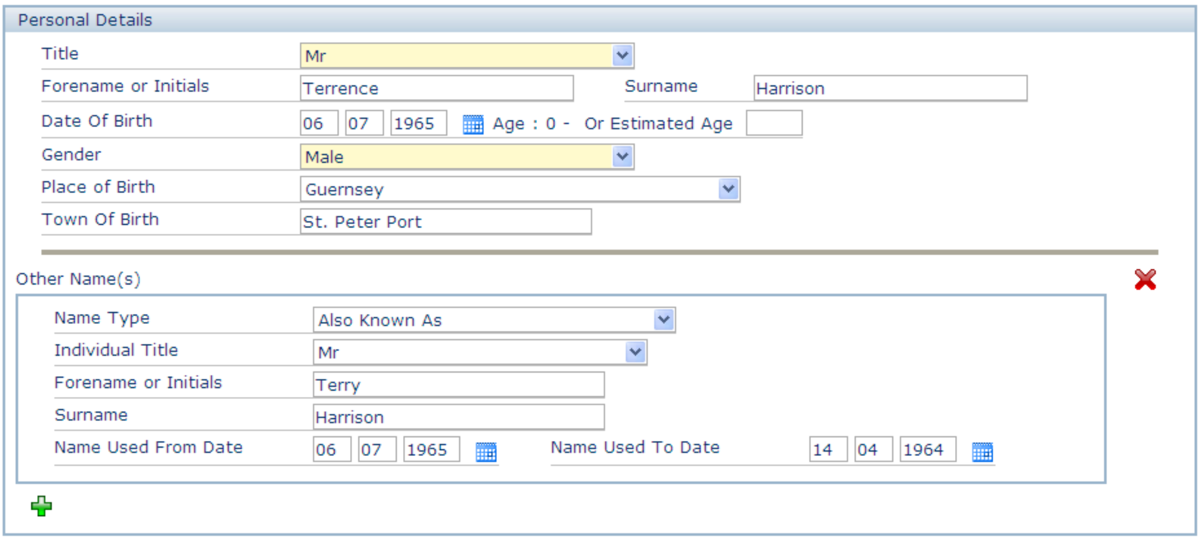
It is mandatory that the Title and Gender fields and at least one of the Forename or Initials field or the Surname field is completed or any individual subject.

It is possible to add multiple Other Name(s) to an individual.

For each other name the following fields can be completed.

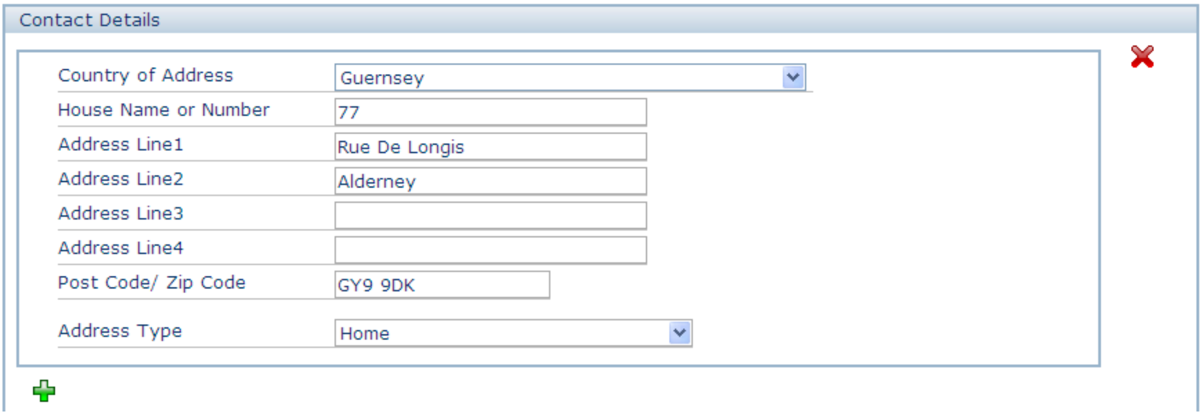
- Name Type
- Individual Title
- Forename(s) or Initials
- Surname
- Name Used From Date
- Name Used To Date

If a Name Type is selected one of either the Forename or Initials field or the Surname field must be completed for an Other Name. If any of the Other Name fields are completed Name Type must be completed.



8.12.5.2 Contact Details

8.12.5.2.1 Addresses



It is possible to add multiple addresses for a subject; for each address the following fields are available for completion.

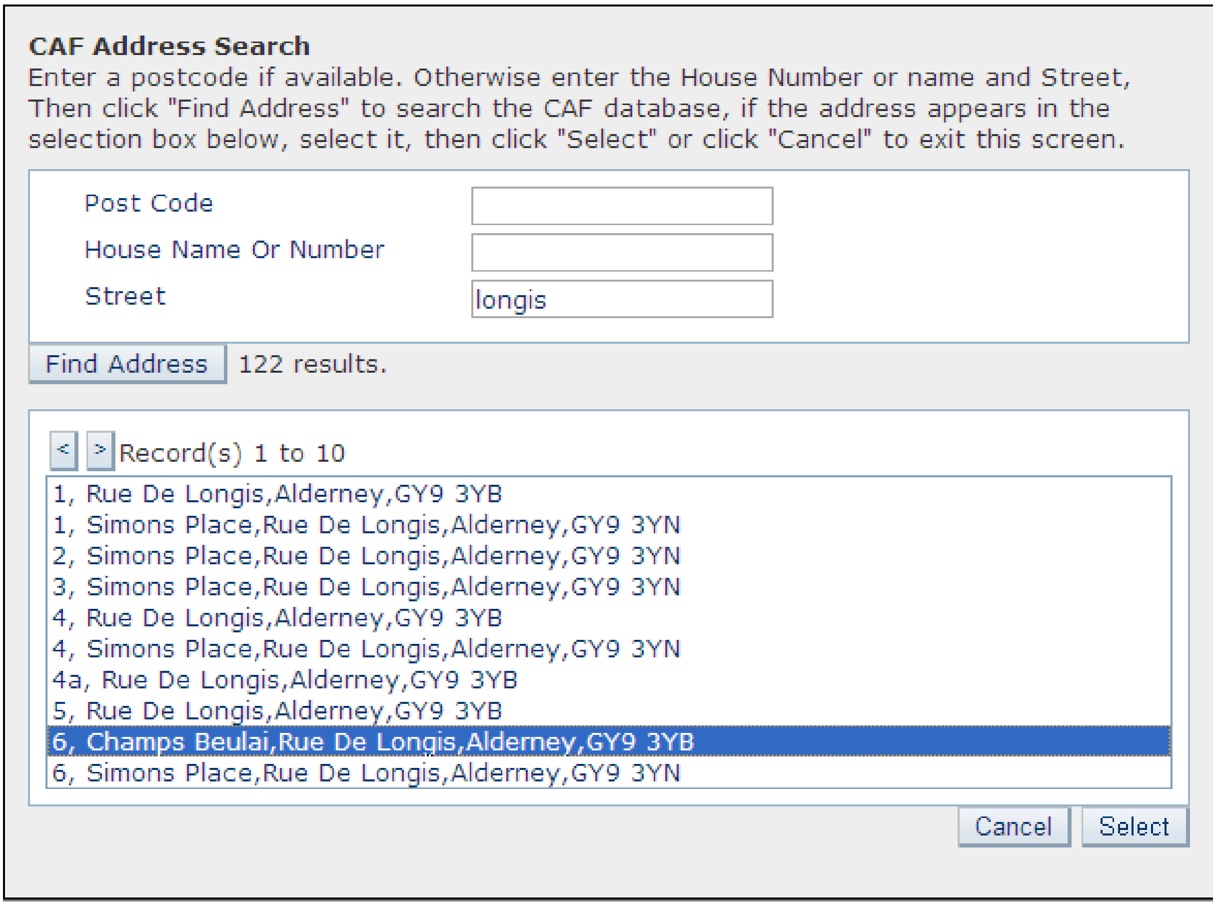
- Country of Address
- House Name or Number
- Address Line 1
- Address Line 2
- Address Line 3
- Address Line 4
- Post Code / Zip Code
- Address Type

It is not possible to enter an address without first selecting a country. If an Address Line field is completed then the previous Address Line must also be completed. If any fields of the address are entered then an address type must be selected. If an address type is selected then an address must be entered.

8.12.5.2.1.1 Address Search

To use the Address search to populate an address in Guernsey

- Select Guernsey as the country
- An Address Search popup box appears with the search fields, Post code, House Name or Number and Street.



- Complete one or more of the search fields
- Click Find Address.
- Matching addresses are returned in the table, if more than 10 matching addresses are found the arrow buttons can be used to navigate through the list.
- Click the required address to select it
- Click the Select button
- The popup will close and the address details will be populated.

To exit the Address search without selecting an address

- Click the Cancel button
- The address details for the subject can be entered manually.

8.12.5.2.2 Telephone Numbers

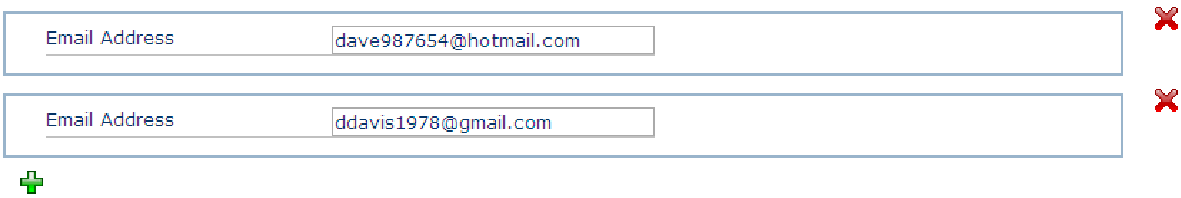
It is possible to add multiple telephone numbers for a subject; for each telephone number the following fields are available for completion.

- Telephone Number
- Extension Number
- Telephone Type

The telephone number should be entered with no spaces and containing only numbers and the characters ( ) or +. If a Telephone type is selected then the telephone number must be completed. If the Telephone number is completed the Telephone type must be selected.

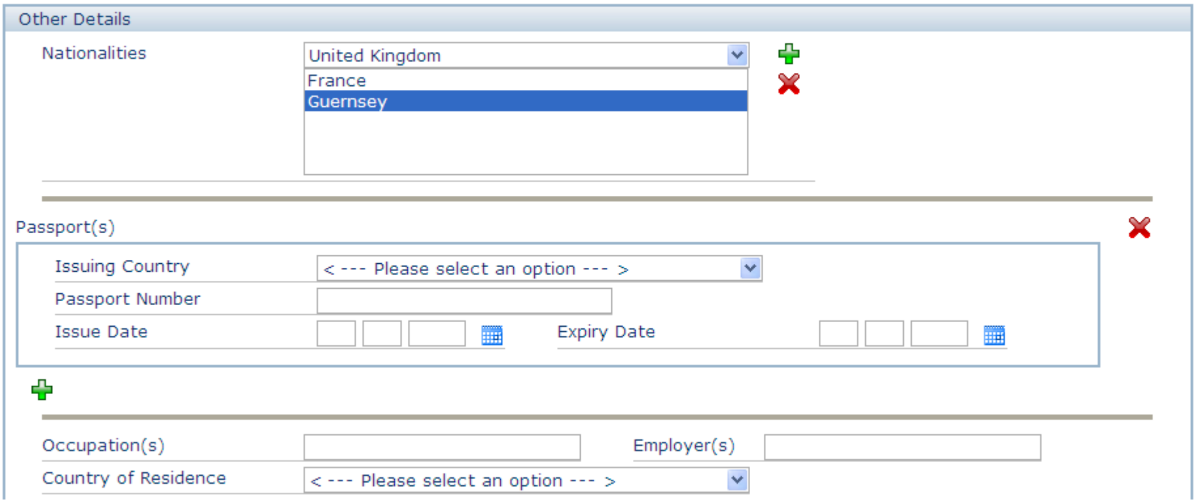
8.12.5.2.3 Email Addresses

It is possible to add multiple email addresses for a subject.



The email address must be properly formatted.

8.12.5.3 Other Details



In the Other Details section the following fields are available for completion.

- Nationality. This field allows multiple nationalities to be selected should the subject have, for example, dual nationality. When a country of birth is selected the nationality dropdown will automatically be set to the same country; however, it is necessary add the nationality to list before it can be saved.

  To add a nationality to the list

  - Select it from the dropdown list
  - Click on the green plus icon

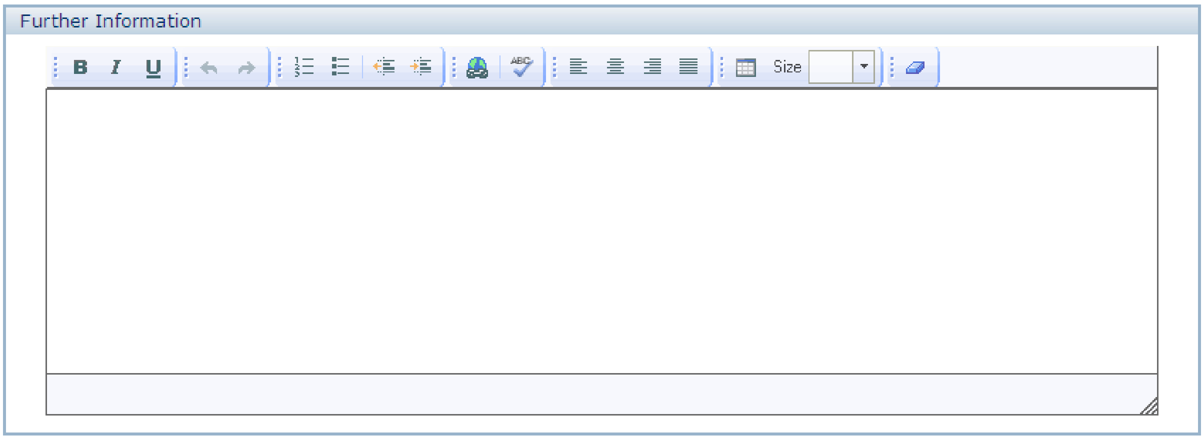
  To remove a nationality from the list

  - Click to select it
  - Click on the red cross icon.

  Additions and removals from the Nationality dropdown list will not be permanent until Save has been clicked.

- Passport(s). It is possible to add multiple Passports for an Individual subject; for each passport the following fields are available for completion.
  - Issuing Country
  - Passport Number
  - Expiry Date
- Occupation(s)
- Employer(s)
- Country of Residence. If an address has been entered this field will initially contain the country of the first country selected for the address of the subject. This field will subsequently require manually updating.

- Further Information. This large scrolling textbox can be used to enter any information about the subject not already completed in the fields above.



8.12.6 Organisation Subject Common Fields

The following details are available for completion on all Organisation subject types, Company, Trust, Non Profit Organisation and Other Organisation.

8.12.6.1 Organisation Details

Every organisation type has a field to enter the name of the organisation. This field is mandatory for all organisation subject types.

It is possible to add multiple Other Name(s) to an organisation; for each Other Name the following fields can be completed.

- Organisation Name
- Organisation Name Type
- Name Used From Date
- Name Used To Date

If an Organisation Name is entered an Organisation Name Type is required. If an Organisation Name Type is selected an Organisation Name must be entered.

8.12.6.2 Contact Details

Addresses, Email addresses and telephone numbers can be added for Organisation subjects in the same way as they are added for Individual subjects. See Section 8.12.5.2.

8.12.6.3 Officials

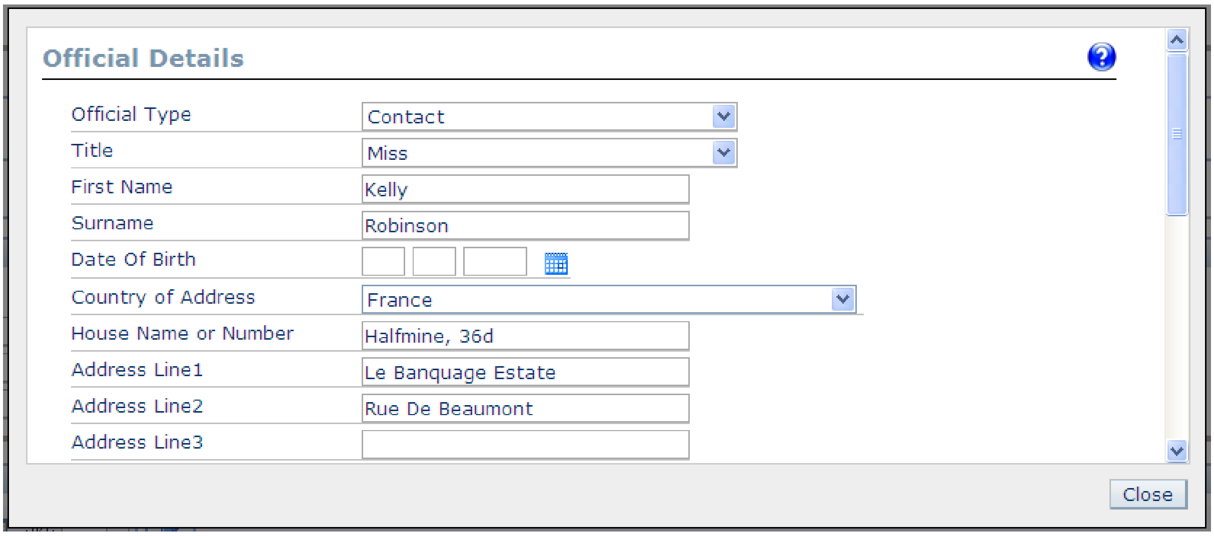
For each organisation type is possible to enter multiple officials.

In the Other Details section there is an Add Official(s) area.

To view, edit or enter the details of an official

- Click the Edit Details button in the official area
- The Officials details pop up box appears
- If required; enter or modify the details
- Click Close
- The popup will close.

The official details will not be validated or saved until the organisation is saved.



The Officials Details popup has a scrollbar; scroll down to view all available fields.

The following fields are available for completion for each official.

- Official Type

- Title
- First Name
- Surname
- Date of Birth
- Country of Address
- House Name or Number
- Address Line 1
- Address Line 2
- Address Line 3
- Address Line 4
- Post Code / Zip Code
- Address Type
- Official Additional Information

Where an official name is entered an official type is required. Where an official type is entered an official first name or surname must be entered.

Addresses for Officials are handled in a similar way to addresses for subjects.

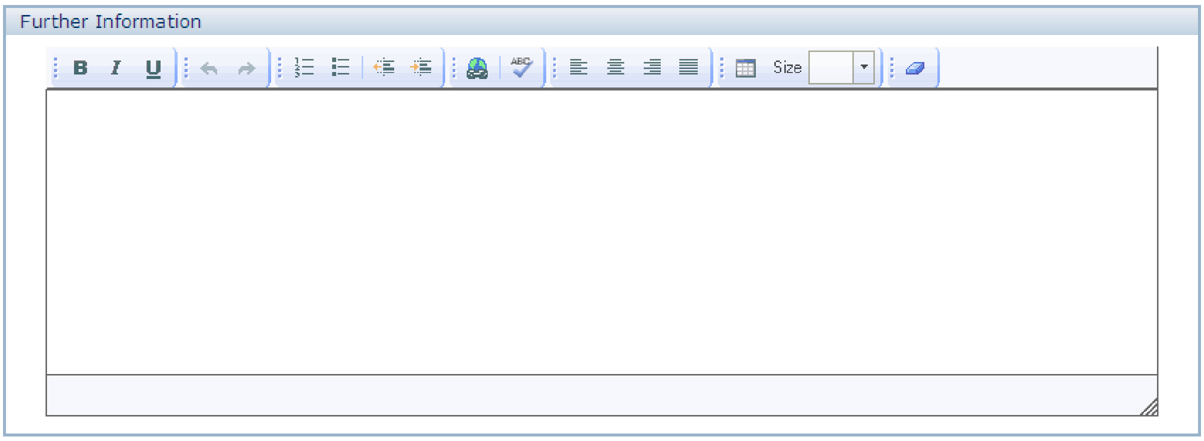
It is not possible to enter official address details without first selecting a country. If Guernsey is selected as the country the Address Search can be used. If an Address Line field is completed the previous Address Line must also be completed. If any fields of the address are entered an address type must be selected. If an address type is selected an address must be entered.

To exit the official popup without saving the official

- Click the Exit button
- ❖ The popup will close and no changes will be made.

8.12.6.4 Further Information

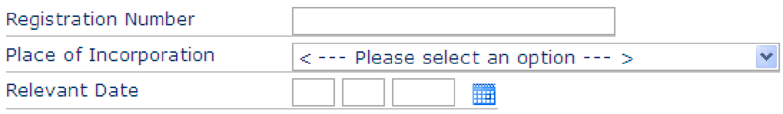
Each organisation subject type has a large Further Information box in the Other Details area. This large scrolling textbox can be used to enter any information about the subject for which there is not a dedicated field.



8.12.7 Company Subject Details

Company Subjects have the following fields to allow details to be entered which are specific to Companies.

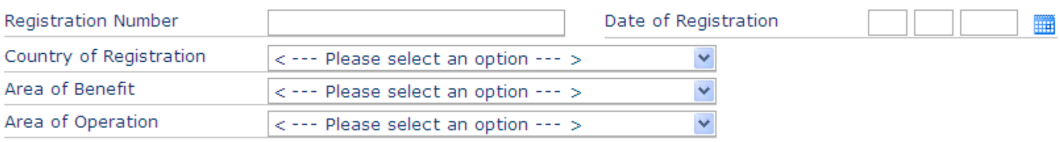
- Registration Number
- Place of Incorporation
- Relevant Date



8.12.8 Non Profit Organisation Subject Details

Non Profit Organisation Subjects have the following fields to allow details to be entered which are specific to Non Profit Organisations.

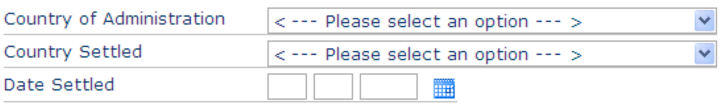
- Registration Number
- Date of Registration
- Country of Registration
- Area of Benefit
- Area of Operation



8.12.9 Trust Subject Details

Trust Subjects have the following fields to allow details to be entered which are specific to Trusts.

- Country of Administration
- Country Settled
- Date Settled



8.12.10 Other Organisation Subject Details

Other Organisation Subjects have the following fields to allow details to be entered which are specific to Other Organisations.

- Legal Number / Other Registration or Reference Code
- Date of Formation / Creation
- Country of Operation

8.13 Accounts, Transactions and Parties

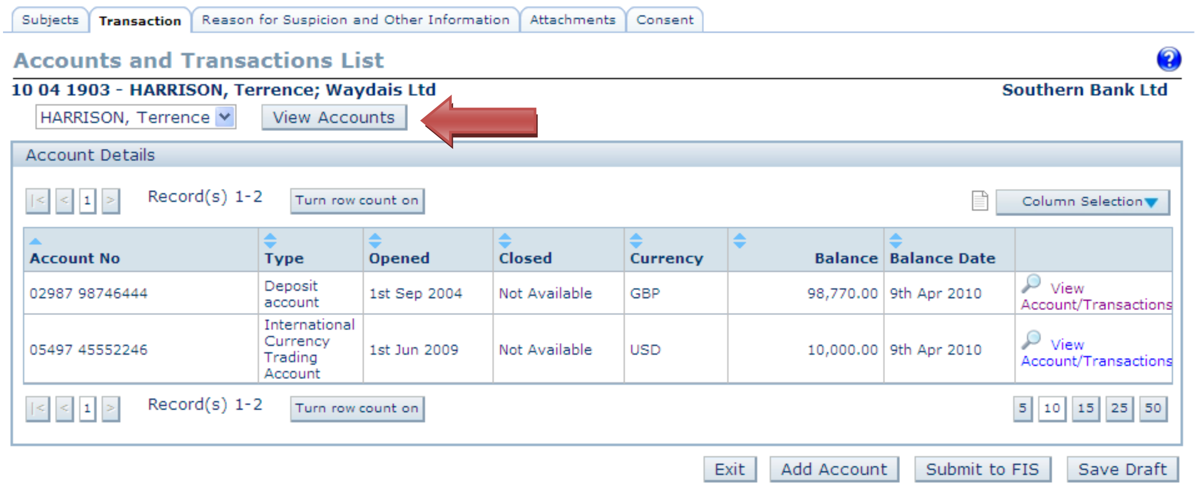
Accounts, Transactions and Parties to a transaction can be added to Disclosures before they are submitted to FIS. After the disclosure has been submitted it is not possible to add or edit accounts, transactions or parties.

8.13.1 Accounts and Transactions List

The Account Details datapager on the transaction screen will list any accounts entered for the currently selected subject.

To view accounts for a different subject

- Select the name of the subject from the dropdown list at the top of the screen
- Click the View Accounts button
- ❖ The Account details datapager will be populated with any entered accounts of the selected subject.

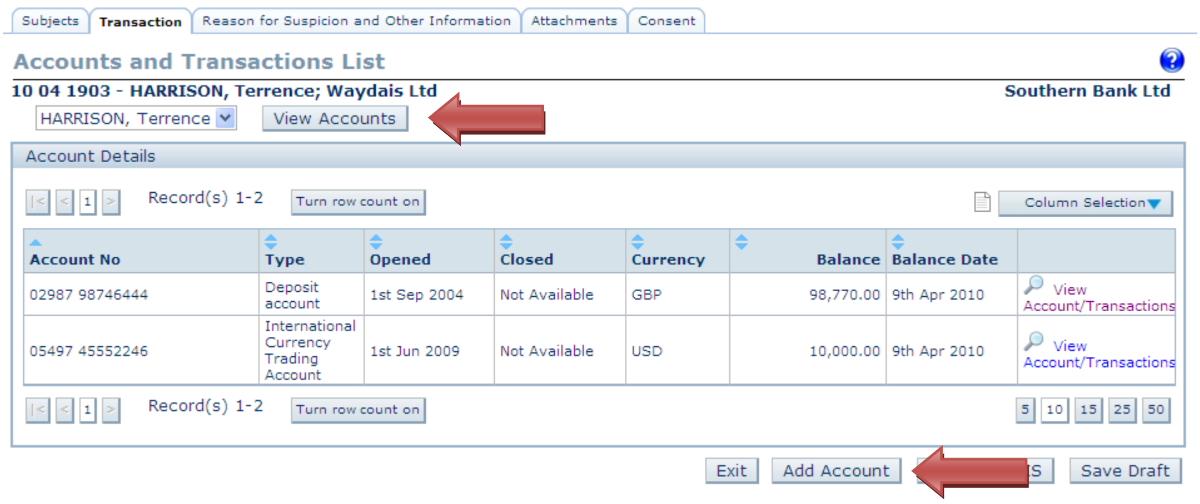


8.13.2 Add Account

New accounts can be added to Disclosures which have not yet been submitted to FIS.

From the top of the Accounts and Transactions List screen .

- Select the name of the subject who owns the account
- Click View Accounts.
- ❖ The screen will reload and any existing accounts for the subject will be displayed in the Account Details datapager.
- Click the Add Account button at the bottom of the screen.

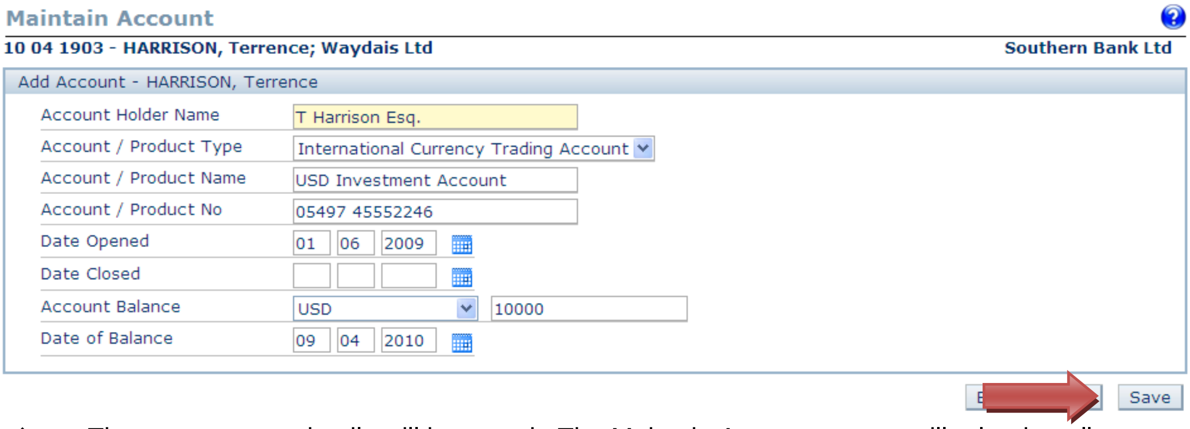


- ❖ The Maintain Account screen will be displayed.
- ❖ The following fields are available for completion:
  - ❖ Account Name
  - ❖ Account Holders. Multiple account holders can be added. To add an account holder who already exists as part of the disclosure (either as a subject, official or transaction party), select Existing Individual / Organisation and choose the from the dropdown list. To add a new Account Holder, select Other Individual or Other Organisation and type the Account Holder’s name in the box(es) provided.
  - ❖ Account / Product Type
  - ❖ Account / Product Name
  - ❖ Account / Product No.
  - ❖ Financial Institution
  - ❖ Swift / BIC Address
  - ❖ Sort Code
  - ❖ Date Opened
  - ❖ Date Closed
  - ❖ Account Balance. To enter an account balance; first select the account currency, the account balance box will then appear. It is not mandatory to enter an amount, even if a currency is selected.

- ❖ Date of Balance

Complete all known details

Click the Save button



- ❖ The new account details will be saved. The Maintain Account screen will reload to allow Account Transactions to be entered.

For each account an Account Name and a Financial Institution must be entered. If an Account Holder type has been selected an Account Holder must be selected or entered. If a Swift / BIC address is entered it must be either 8 or 11 characters with no spaces. If a Sort Code is entered it must be exactly 6 numbers.

To exit the Maintain Account screen without adding a new account or after adding a new account

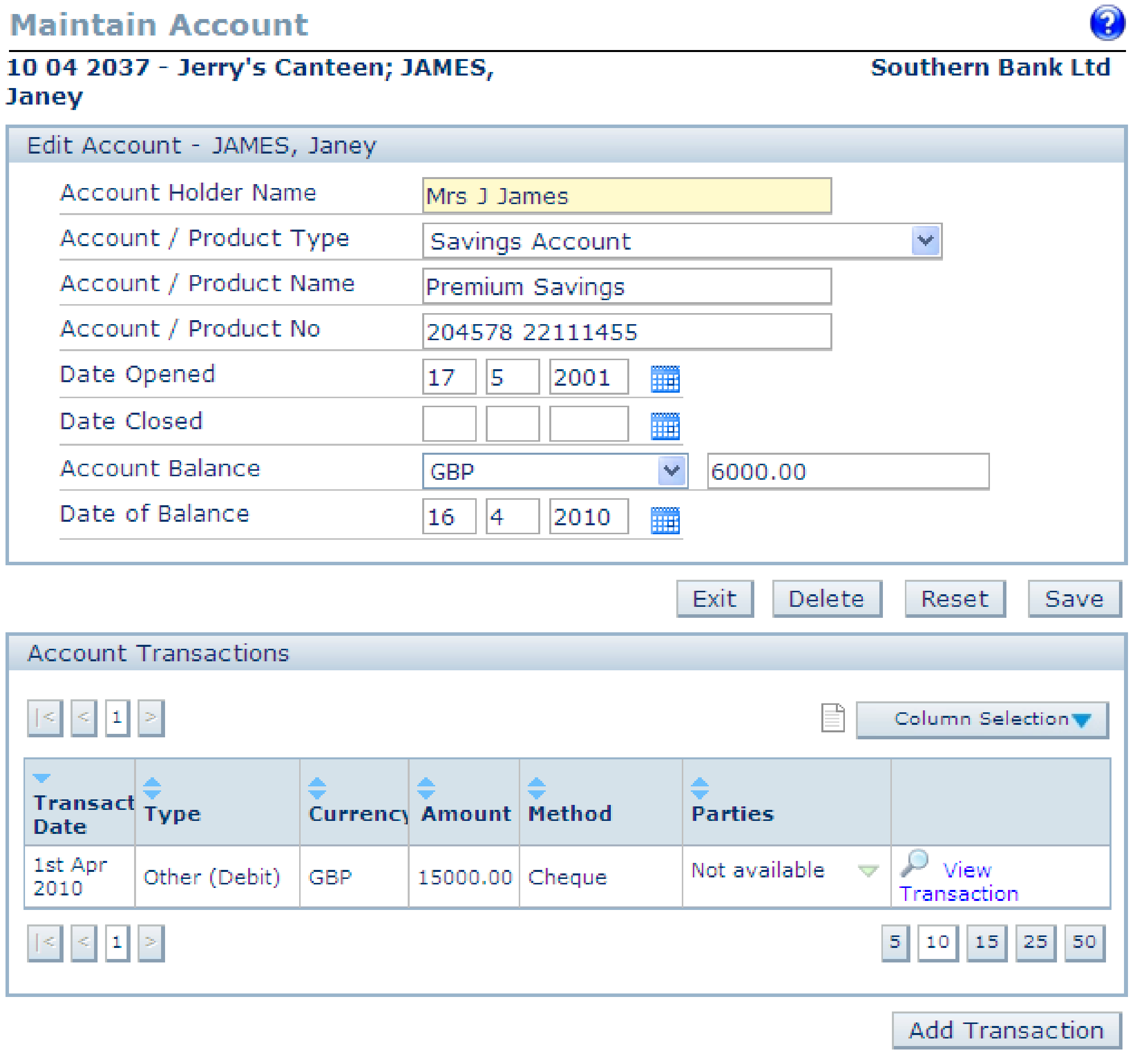
Click the Exit button

- ❖ The Accounts and Transactions list screen will be displayed.

8.13.3 Transactions

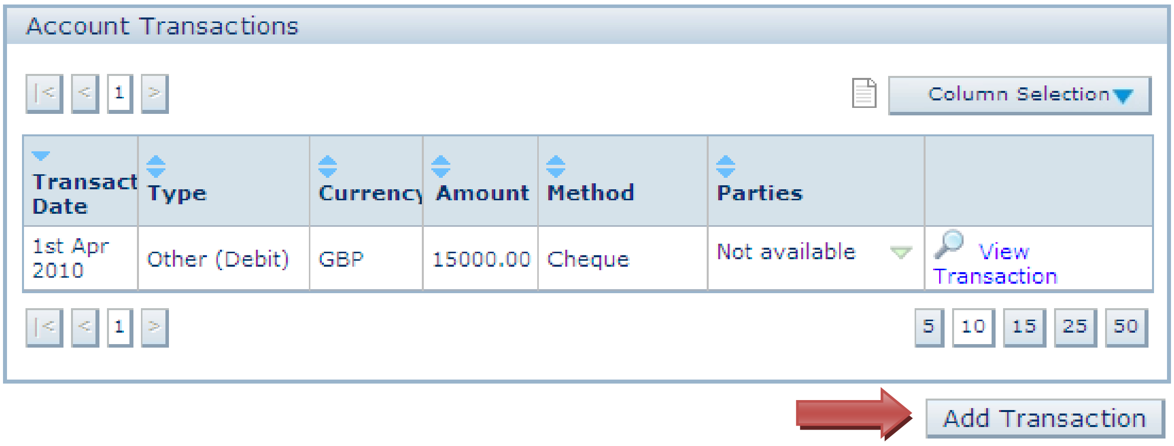
Each account can have multiple transactions. A transaction must be part of an account and cannot be added until an account has been added.

The Account Transactions datapager appears below saved Account details on the Maintain Account screen (to locate the screen follow the procedure detailed in Section 8.13.11).



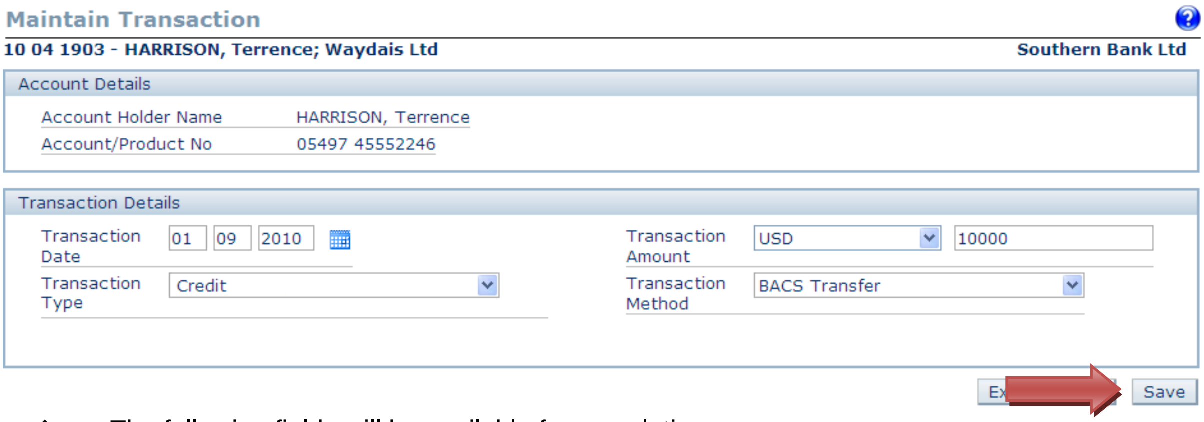
8.13.4 Add Transaction

Open the Maintain Account screen (to locate the screen follow the procedure detailed in Section 8.13.11).



Click the Add Transaction button at the bottom of the screen.

❖ The Maintain Transaction screen will open.



❖ The following fields will be available for completion

- ❖ Transaction Date
- ❖ Transaction Type
- ❖ Transaction Amount. To enter a transaction amount; first select the transaction currency, the amount box will then appear.
- ❖ Transaction Method

Complete all known details

Click the Save button

❖ This will save the new transaction details. The Maintain Transaction screen will reload to allow Transaction Parties to be entered.

For each transaction; the transaction date, transaction type, transaction amount and transaction method fields must be completed.

To exit the Maintain Transaction screen without adding a new transaction or after adding a new transaction

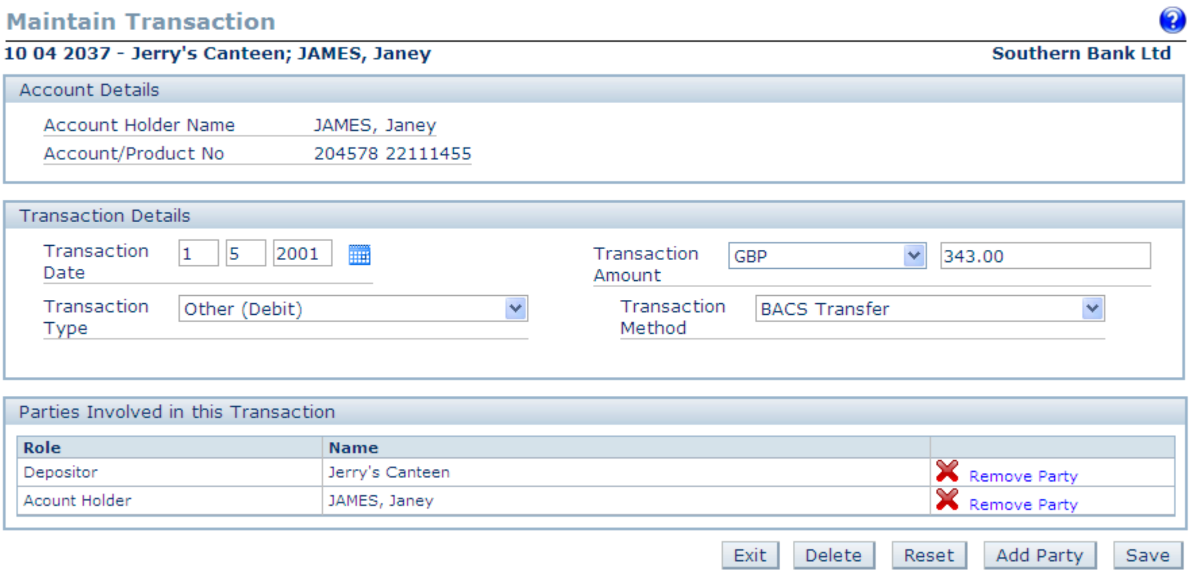
- Click the Exit button
- ❖ The Maintain Account screen will be displayed.

8.13.5 Parties

The details of transaction parties on disclosures which have not yet been submitted to FIS can be edited. Once the disclosure has been submitted to FIS the transaction party information will be read only.

Each transaction can have multiple parties. A party to a transaction cannot be added until the transaction has been saved.

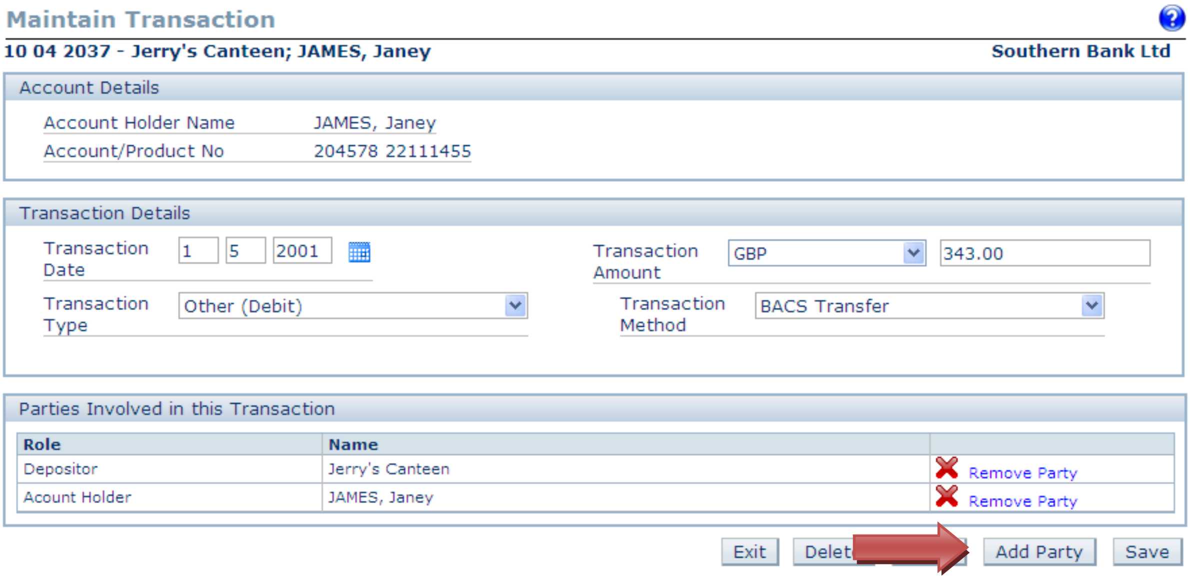
The Parties Involved in this Transactions datapager appears below the saved Transaction Details.



8.13.6 Add a Party or Parties involved in a Transaction

To add a new party to a transaction open the Maintain Transaction details screen (to locate the screen follow the procedure detailed in Section 8.13.9).

- Click the Add Party button at the bottom of the screen



- This will open the Maintain Transaction Parties screen.

8.13.6.1 Subjects of the record as transaction parties

Any subjects already added to the disclosure will appear as potential parties to the transaction.

Any officials added to organisation subjects will appear as potential parties to the transaction.

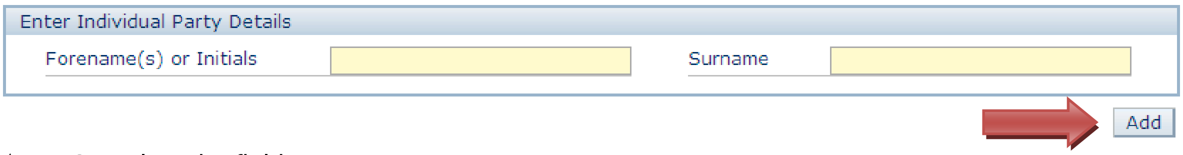
8.13.6.2 Additional parties who are not subjects of the record

It is possible to add additional parties to a transaction which are not subjects of the record.

To add a new Individual as a Party

Click the Add Individual Party button

❖ Forename(s) or Initials and Surname fields to be completed for the new individual party will be displayed at the bottom of the screen.

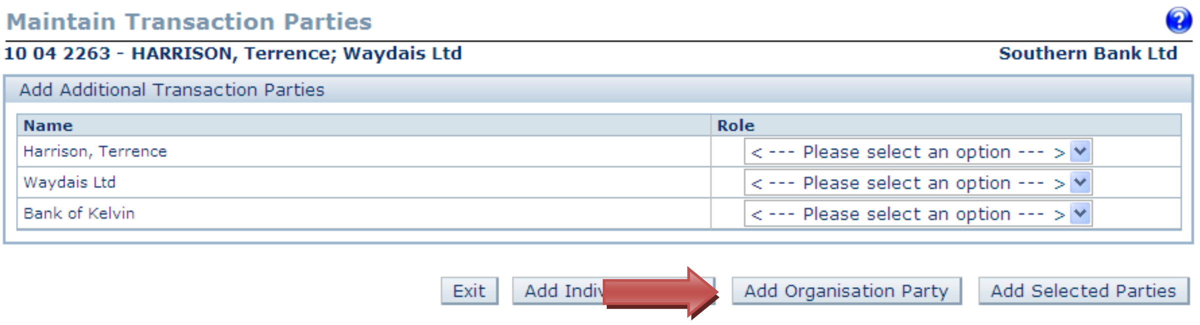


Complete the fields.

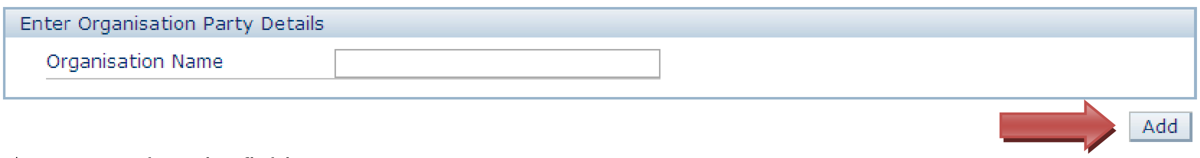
Click the Add button to add the new party details to the list at the top of the screen.

To add a new Organisation as a Party

Click the Add Organisation Party button



❖ An Organisation name to be completed for the new organisation party will be displayed at the bottom of the screen.

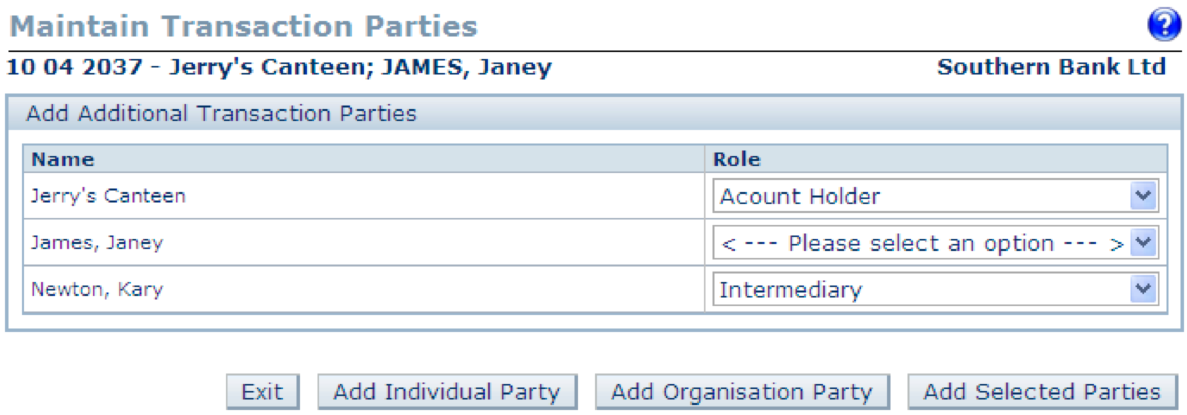


Complete the field.

- Click the Add button to add the new party details to the list at the top of the screen.

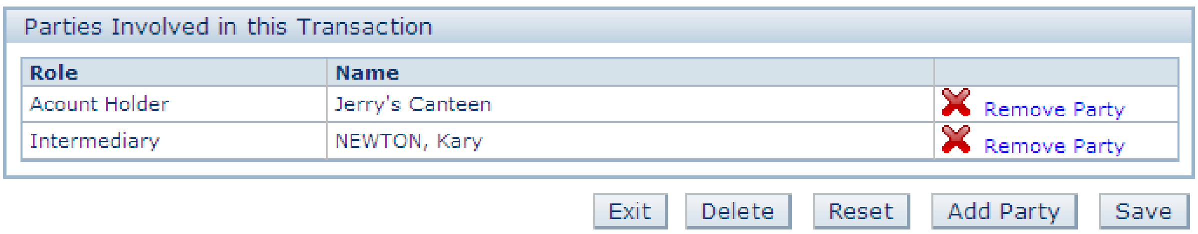
The additional parties will not be saved to the transaction until their roles have been selected and Add Selected Parties has been clicked – see 8.13.6.3 Adding parties and their roles below.

8.13.6.3 Adding parties and their roles



The Maintain Transaction Parties screen will contain all subjects of the record and any additional parties added using the method described above.

- For each party to be added to the transaction select the role the party played from the dropdown list(s)
- Click Add Selected Parties button
- ❖ The Maintain Transaction Parties screen will close and the Maintain Transaction screen will be displayed again.
- ❖ The newly added parties and their roles will be displayed in the Parties Involved in this Transaction datapager at the bottom of the screen.

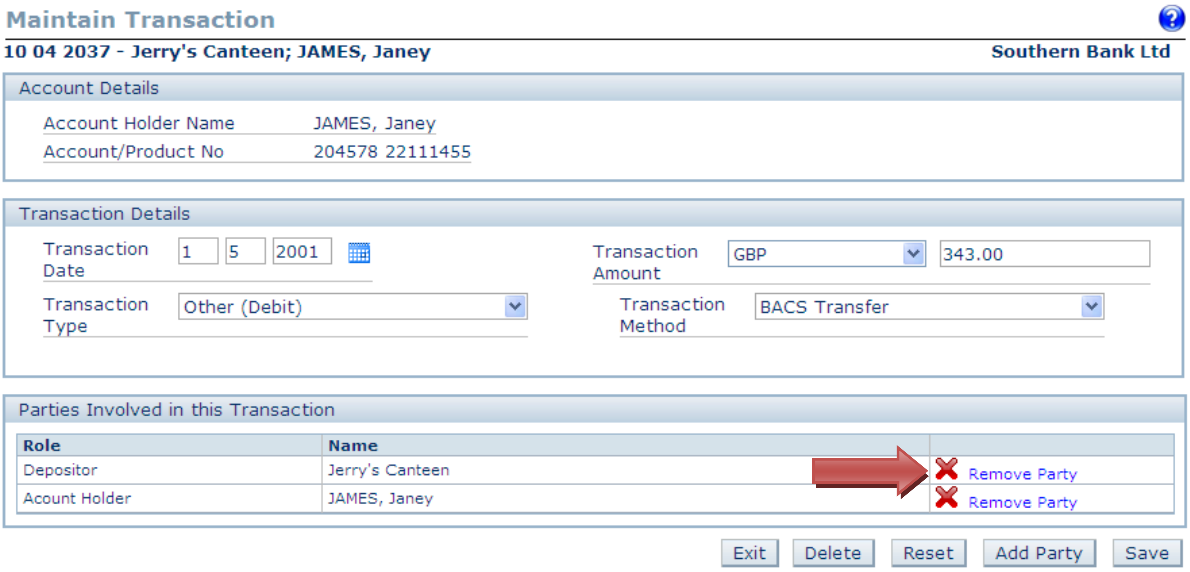


To exit the Maintain Transaction Parties screen without adding new parties or their roles

- Click the Exit button
- ❖ The Maintain Transaction screen will be displayed without adding any additional parties or their roles.

8.13.7 Removing Parties involved in a Transaction

To remove a party from a transaction open the Maintain Transaction details screen (to locate the screen follow the procedure detailed in Section 8.13.9).



- Locate the party to be removed in the Parties Involved in this Transaction datapager at the bottom of the screen.
- Click the Remove Party link next to the party to be removed.

8.13.8 Editing Parties involved in a Transaction

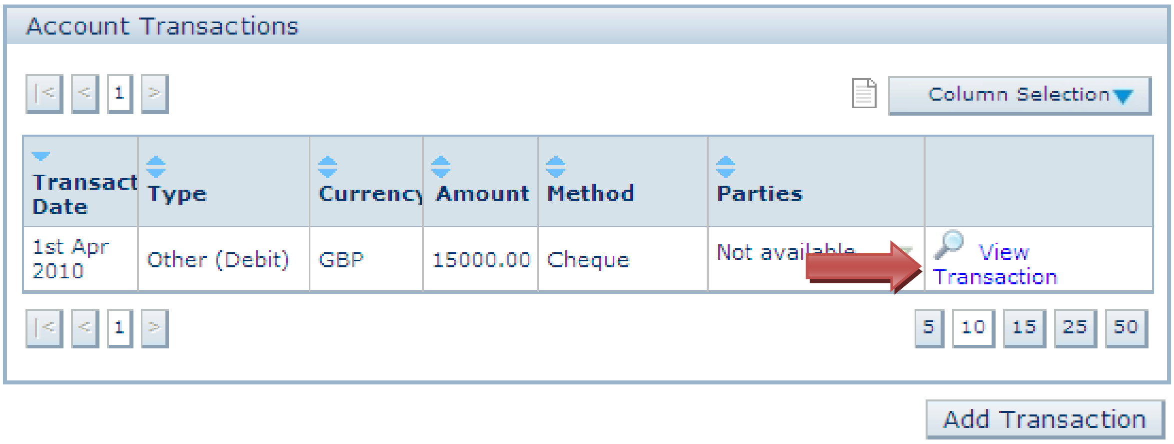
To edit a party to a transaction, for example to modify the party role, remove the party using the method described in 8.13.7 Removing Parties involved in a Transaction and then add a new party using the method described in 8.13.6 Add a Party or Parties involved in a Transaction.

Add a Party or Parties involved in a Transaction.

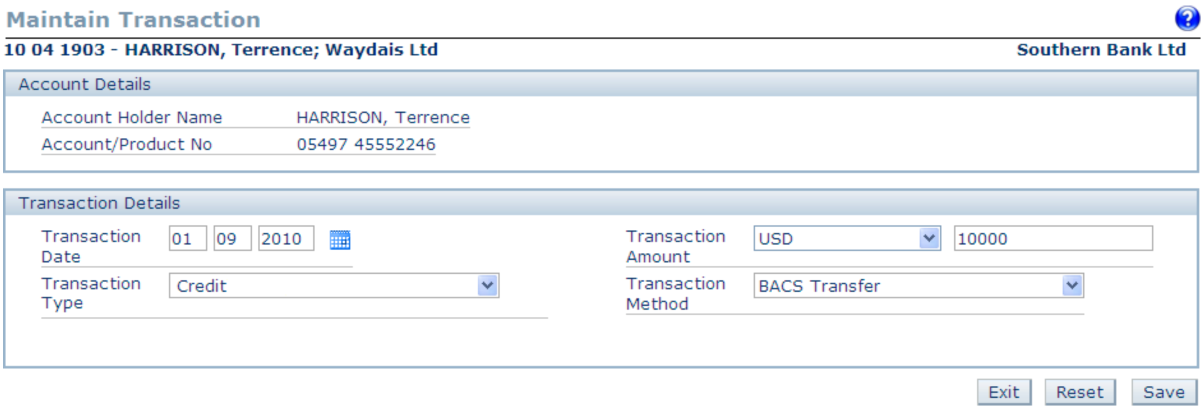
8.13.9 View or Edit a Transaction

The details of transactions on disclosures which have not yet been submitted to FIS can be edited. Once the disclosure has been submitted to FIS the transaction information will be read only.

Open the Maintain Account screen (to locate the screen follow the procedure detailed in Section 8.13.11).



- Click the View Transaction link next to the transaction to be edited.
- ❖ The Maintain Transaction screen will open.



- Amend the details of the transaction
- Click Save.
- ❖ The amended transaction details will be saved. The Maintain Transaction screen will reload for further editing.

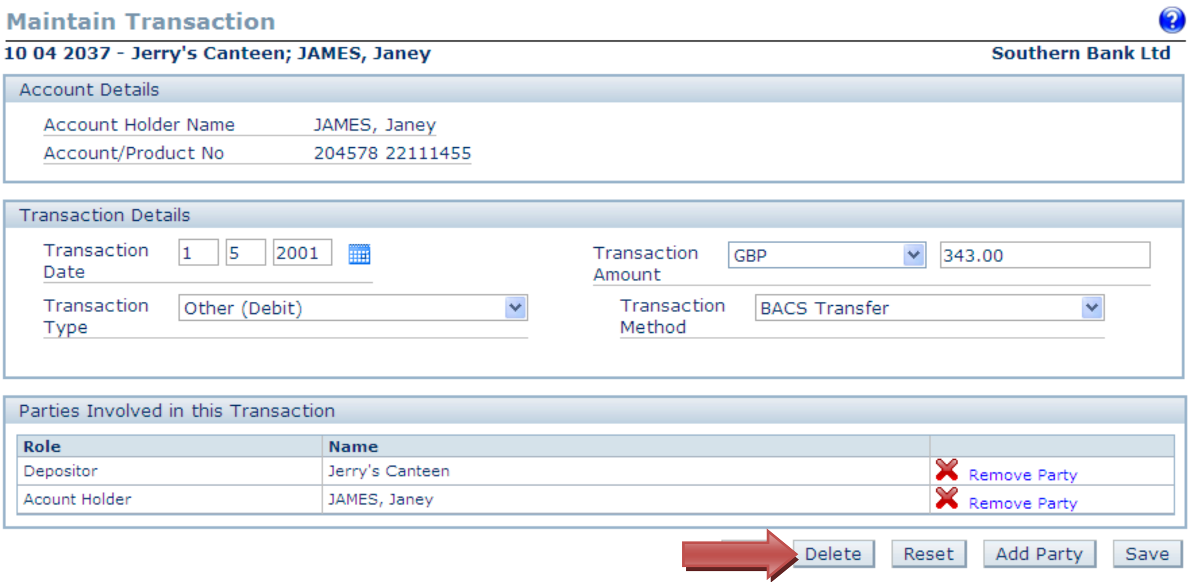
To exit without editing a transaction or after editing a transaction

- Click the Exit button
- ❖ The Maintain Account screen will be displayed.

8.13.10 Delete Transaction

To delete a transaction open the Maintain Transaction screen (to locate the screen follow the procedure detailed in Section 8.13.9).

- Click the Delete button at the bottom of the screen.



- A message will appear asking you to confirm you would like to Delete the transaction.
- Clicking No will not delete the transaction and you will remain on the Maintain Transaction screen.
- Clicking Yes will permanently delete the transaction and any information relating to parties involved in the transaction. The Maintain Account screen which the transaction belonged to will be displayed the transaction will no longer appear in the Account Transactions datapager at the bottom of the screen.

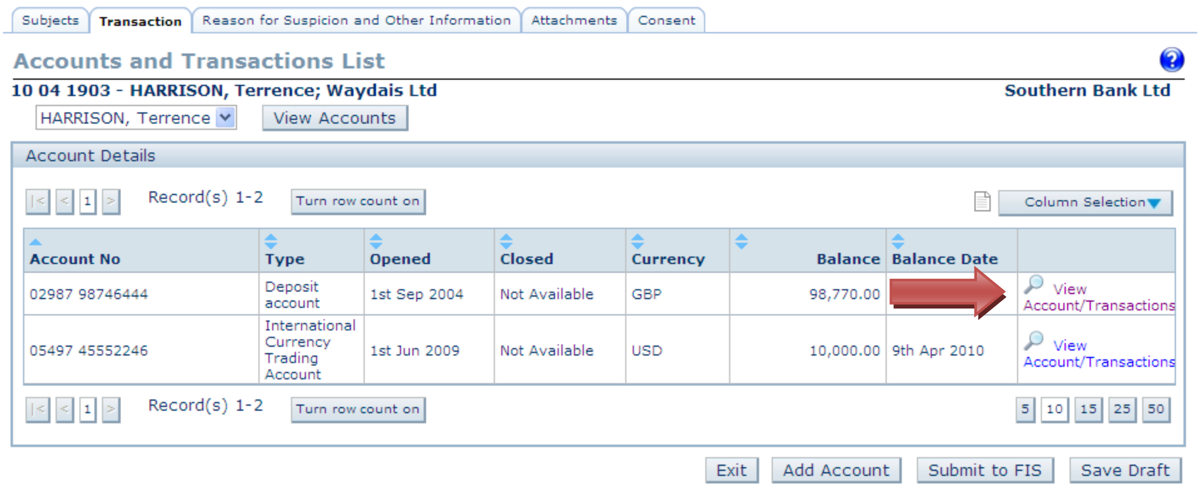
It is not possible to recover deleted information.

8.13.11 Editing Accounts

The details of accounts on disclosures which have not yet been submitted to FIS can be edited.

From the top of the Accounts and Transactions List screen

- Select the name of the subject who owns the account
- Click View Accounts.
- ❖ The screen will reload and any existing accounts for the subject will be displayed in the Account Details datapager.
- Click the View Account/Transactions link next to the account to be edited.



- ❖ The Maintain Account will open.
- Amend the details of the account
- Click Save.
- ❖ The amended account details will be saved. The Maintain Account screen will reload for further editing.

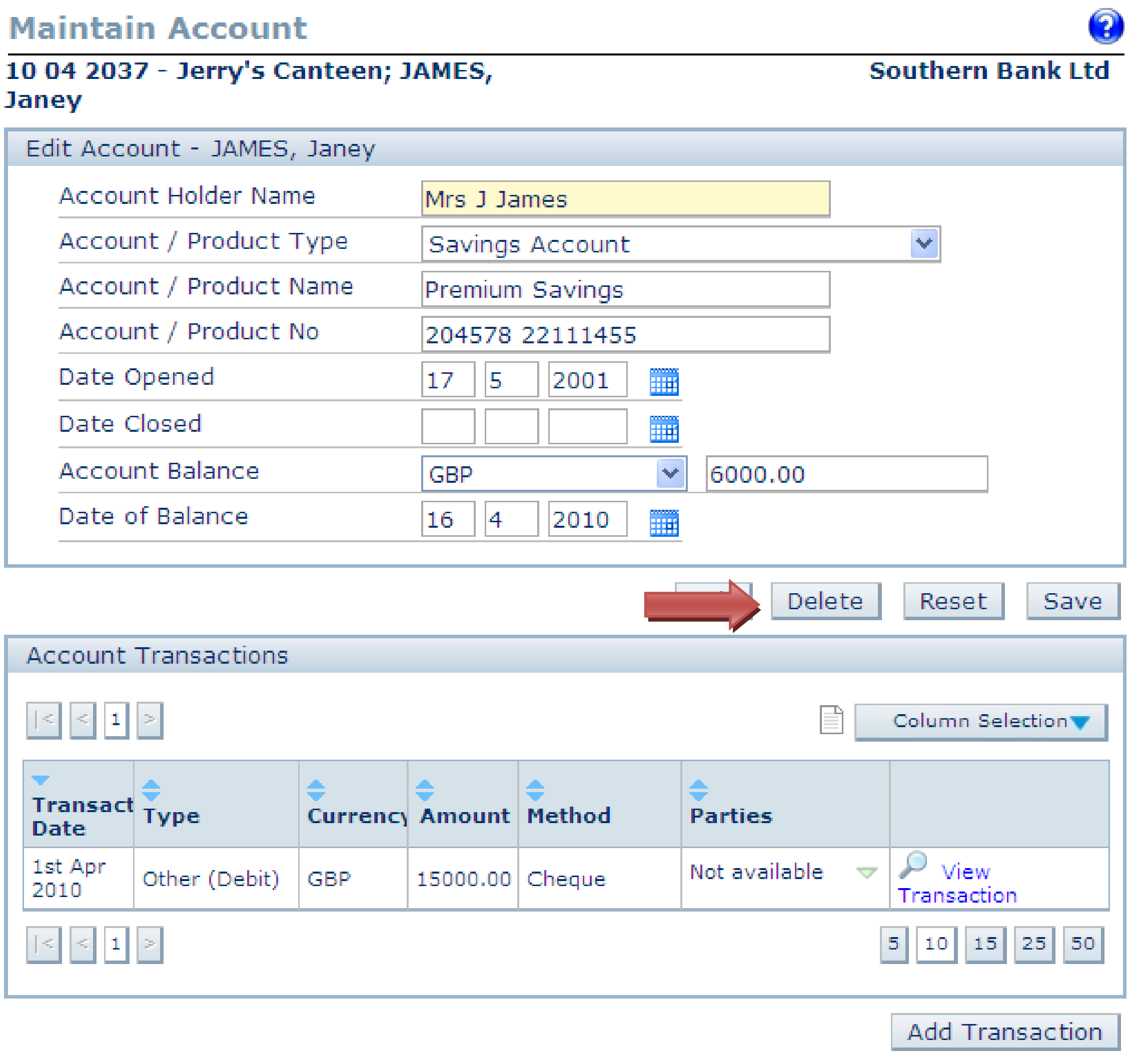
To exit the Maintain Account screen without editing an account or after editing an account

- Click the Exit button
- ❖ The Accounts and Transactions list screen will be displayed.

8.13.12 Deleting Accounts

Accounts on disclosures which have not yet been submitted to FIS can be deleted. Deleting an account will delete all information about the account including Transactions and Parties to Transactions. It is not possible to recover deleted information.

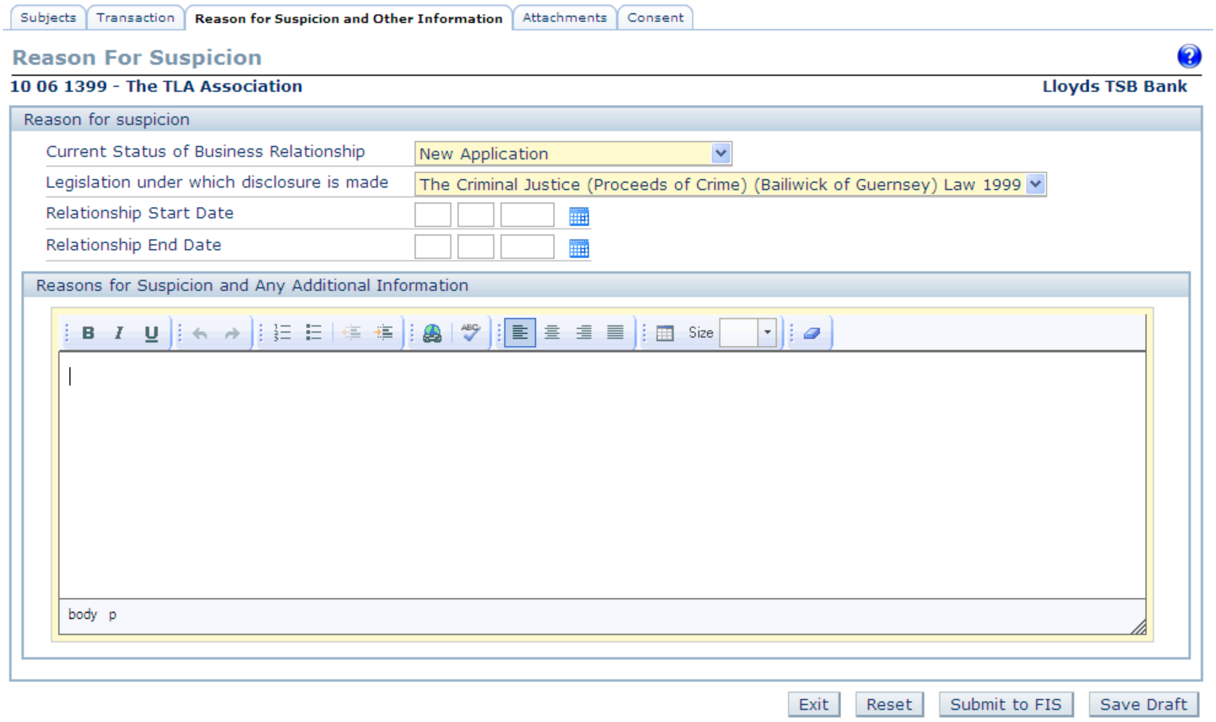
To delete an Account open the Maintain Account screen for the account to be deleted (to locate the screen follow the procedure detailed in Section 8.13.11).



- Click the Delete button.
- ❖ A message will appear asking you to confirm you would like to Delete the account.
- Clicking Yes will permanently delete the account and any information relating to transactions on that account and parties of those transactions. The Accounts and Transactions List screen will be displayed and the Account will no longer appear in the datapager.
- Clicking No will not delete the account and you will remain on the Maintain Account screen.

8.14 Reason for Suspicion

The Reason for Suspicion section of the disclosure is accessed by clicking the Reason for Suspicion and Other Information tab of the Disclosure.



This screen is only editable before the disclosure is submitted to FIS. Once the disclosure has been submitted the information will be read-only.

The following fields are available for completion.

- Current Status of Business Relationship
- Legislation under which Disclosure is made
- Relationship Start Date
- Relationship End Date
- Reason for Suspicion and Any Additional Information

It is mandatory that the Current Status of Business Relationship, Legislation under which Disclosure is made and Reason for Suspicion and Any Additional Information fields are completed before the disclosure can be submitted to FIS.

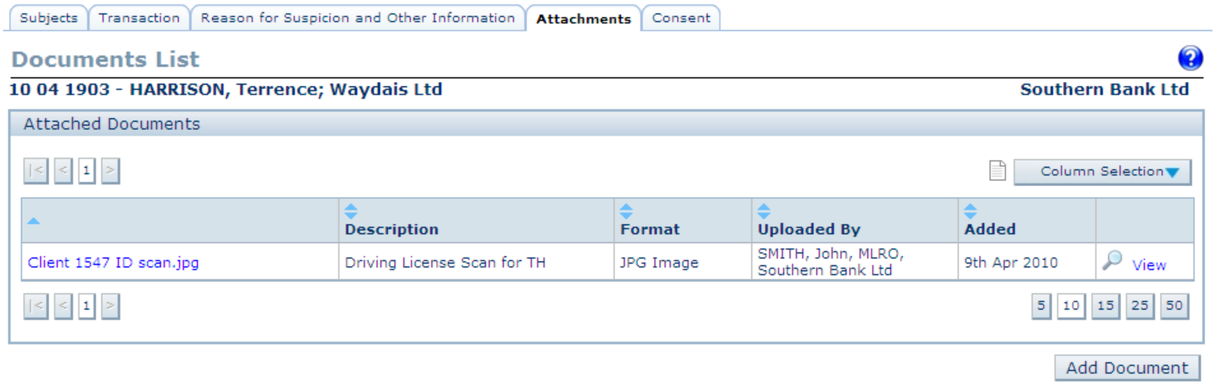
8.15 Attachments

Additional documents or images may be submitted as attachments to a disclosure. It is possible to add attachments to submitted disclosures but it is not possible to edit or remove attachments from submitted disclosures. Attachments on submitted disclosures are view only.

Click the Attachments tab on a disclosure to open the Attachments screen.

8.15.1 Attached Documents

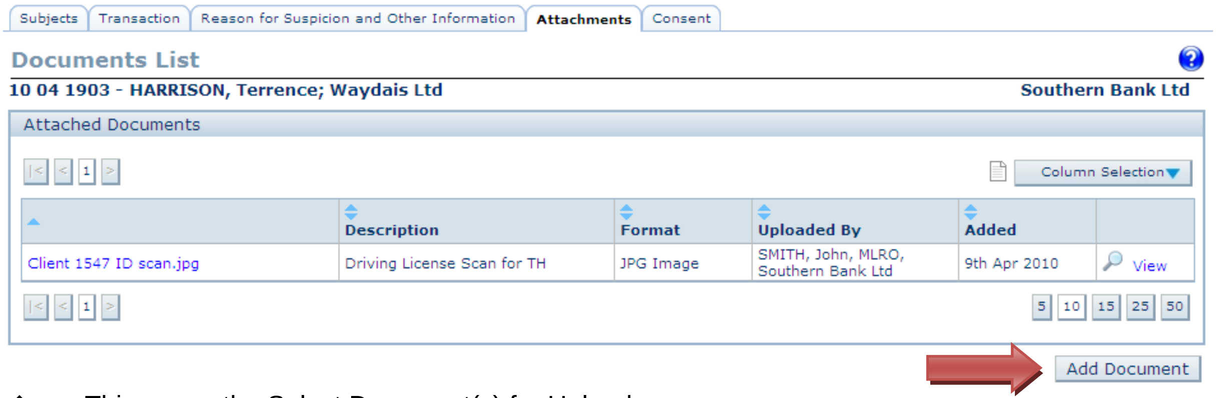
A datapager at the top of the Attachments screen lists all the documents or images, which have been uploaded to the disclosure.



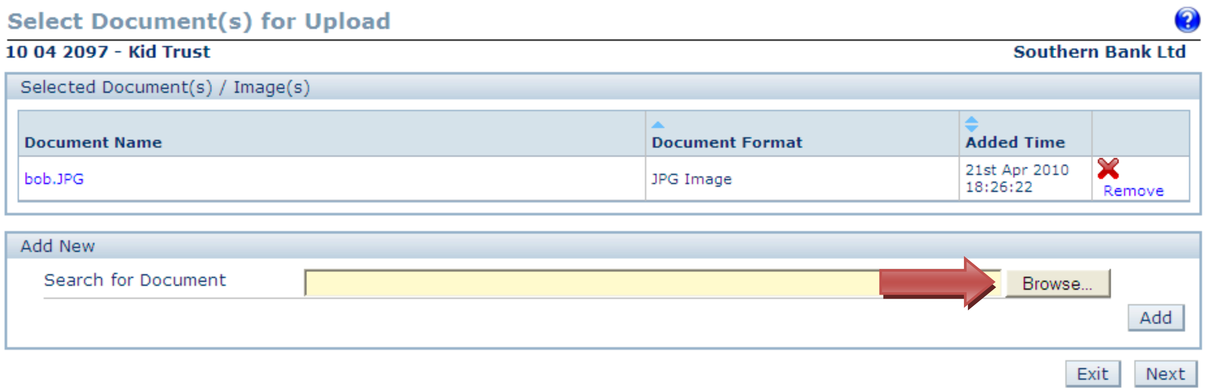
8.15.1.1 Adding a new attachment

To add a new attachment to a disclosure

- Click the Add Document button on the Attachments screen.



- ❖ This opens the Select Document(s) for Upload screen.
- Click the Browse button on this screen.



- ❖ This will open a window which will allow a document to be selected from the user's computer or network. Once a file has been selected the Search for Document path will be populated.

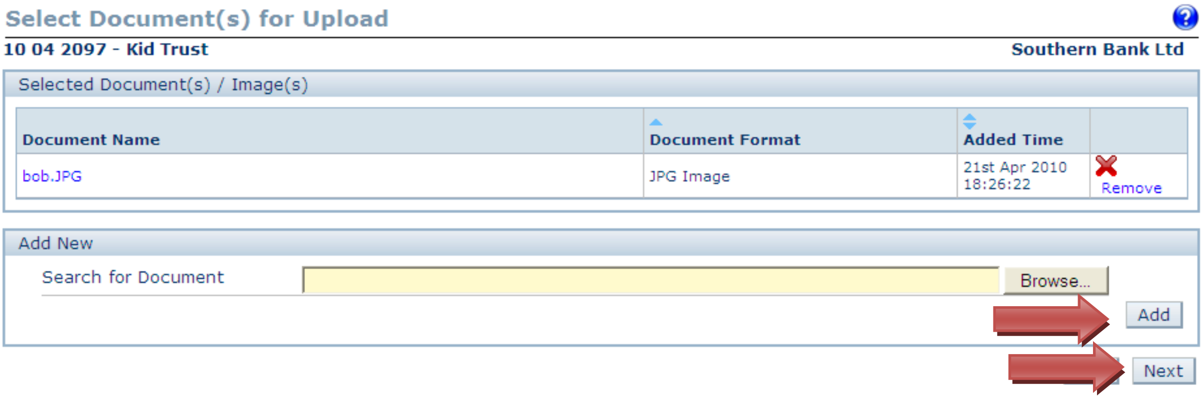
- Click the Add button to upload the file.
- ❖ The screen will reload and the uploaded document will be listed at the top of the screen. Multiple documents can be uploaded on this screen by repeatedly browsing for a file and clicking the Add button. Uploading a zip file will extract the individual files and list them at the top of the screen.

To remove a document at this stage

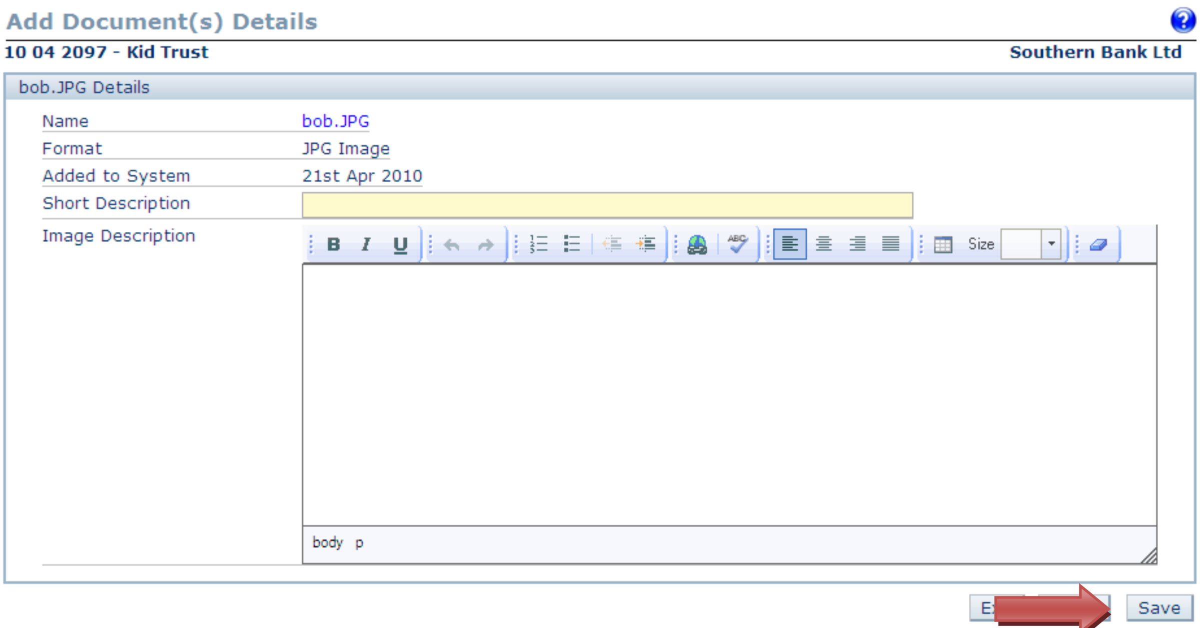
- Click the Remove link.

Once all the required documents are listed at the top of the screen.

- Click the Next button.



- ❖ The Add Document(s) Details screen will load; a set of fields will be displayed for each document uploaded on the previous screen. Each document has a Short Description and scrolling free text field to enter details about the document. The Short Description field is mandatory for all uploaded documents.
- Click Save to save the uploaded documents.



- ❖ The Add / Edit Document Details screen will close and the Attachments screen will reload with the new documents in the Attached Document list.

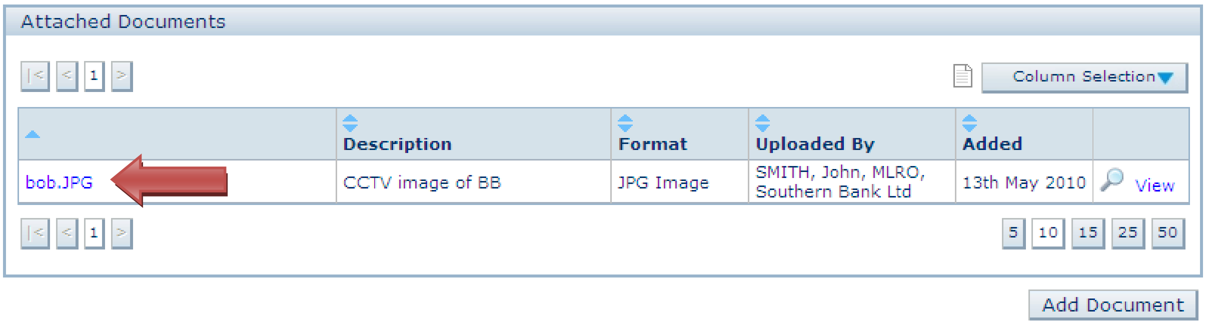
To cancel uploading the documents at any point

- Click the Exit button.
- ❖ The Attachments screen will be displayed.

8.15.1.2 Viewing an attachment

To view an uploaded attachment

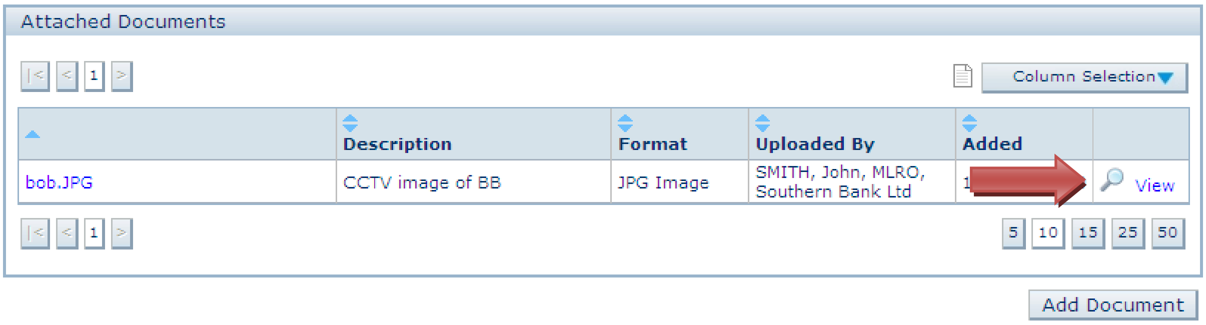
- Click the name of the document on the Attachments screen.



- ❖ This will open the appropriate program to view the attachment, provided it is installed on the user's computer.

To view the details entered about an attachment

- Click the View link of the document on the Attachments screen.

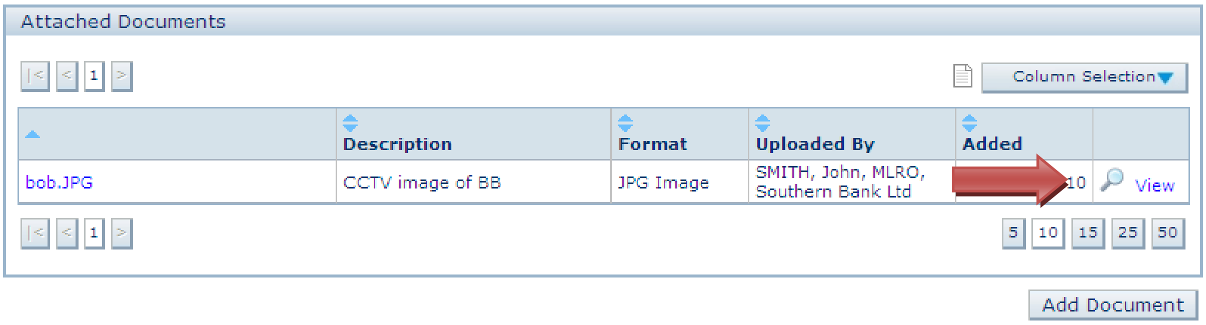


- ❖ This will open the Edit Document Details screen displaying the attachment details. If the attachment has been submitted to FIS, the fields on this screen will be read-only.

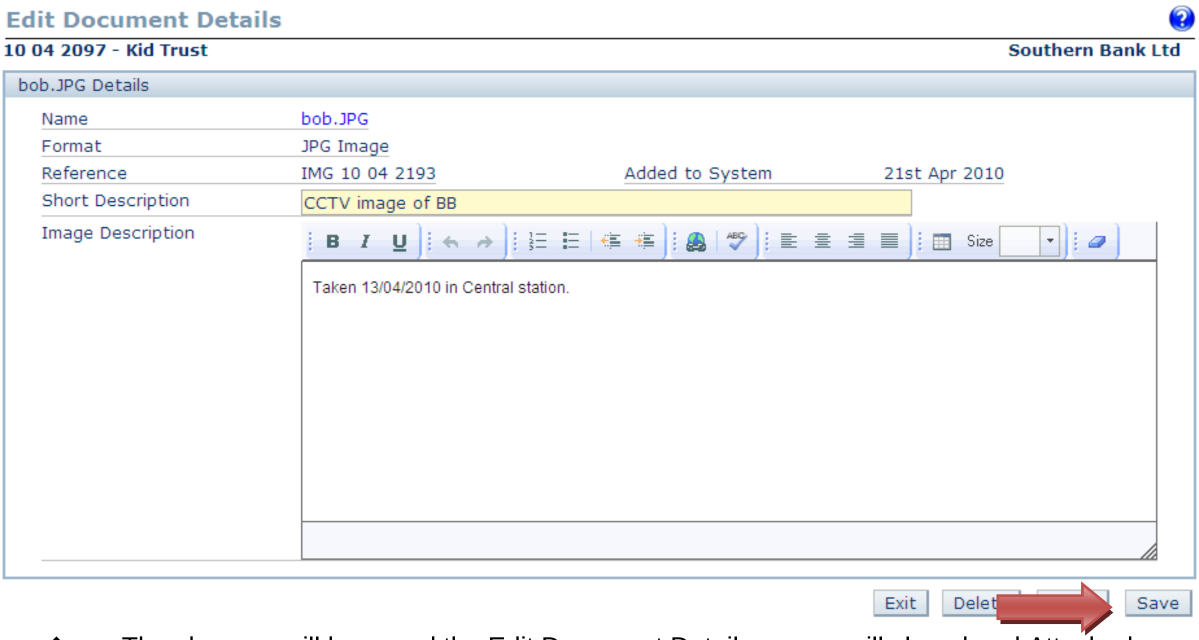
8.15.1.3 Edit the details of an attachment

Attachment details can be edited on disclosures which have not yet been submitted to FIS.

- ❖ Click the View link of the document on the Attachments screen.



- ❖ This will open up the Edit Document Details screen.
- Amend the details of the attachment
- Click the Save button.



- ❖ The changes will be saved the Edit Document Details screen will closed and Attached Documents screen will be displayed.

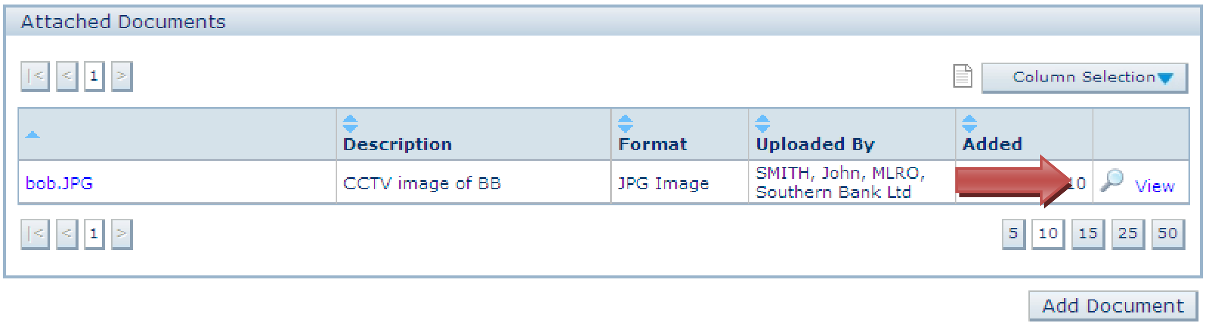
To exit the Edit Document screen without making any changes.

- Click the Exit button.
- The Attachments screen will be displayed.

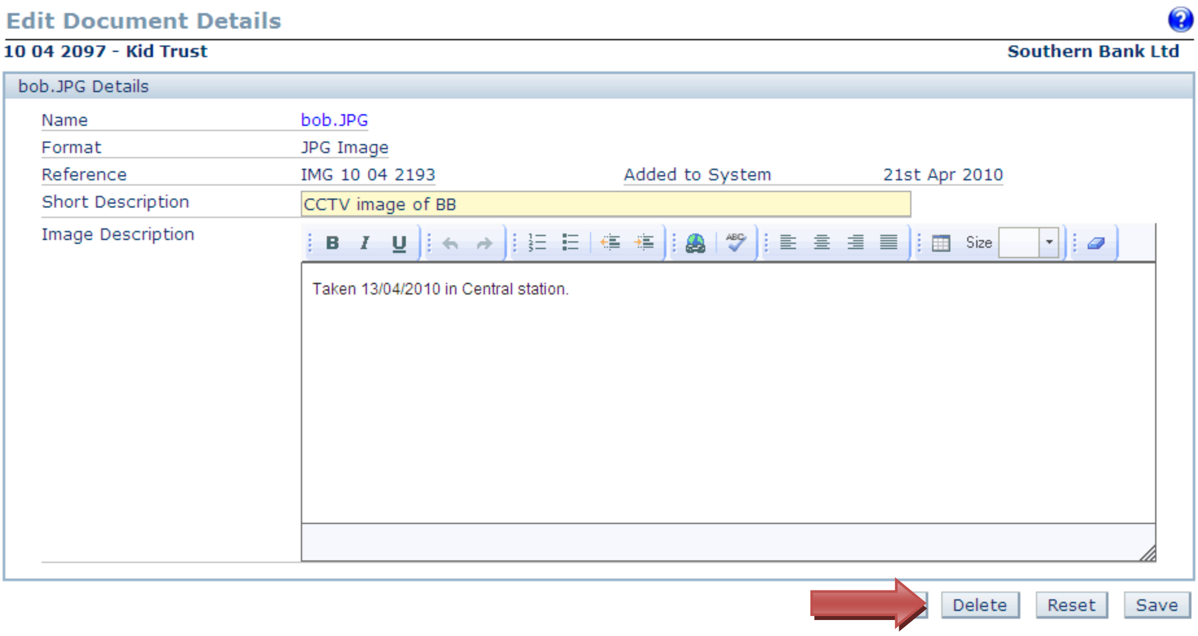
8.15.1.4 Delete an attachment

Attachments can be removed from disclosures which have not yet been submitted to FIS.

- Click the View link of the document on the Attachments screen.

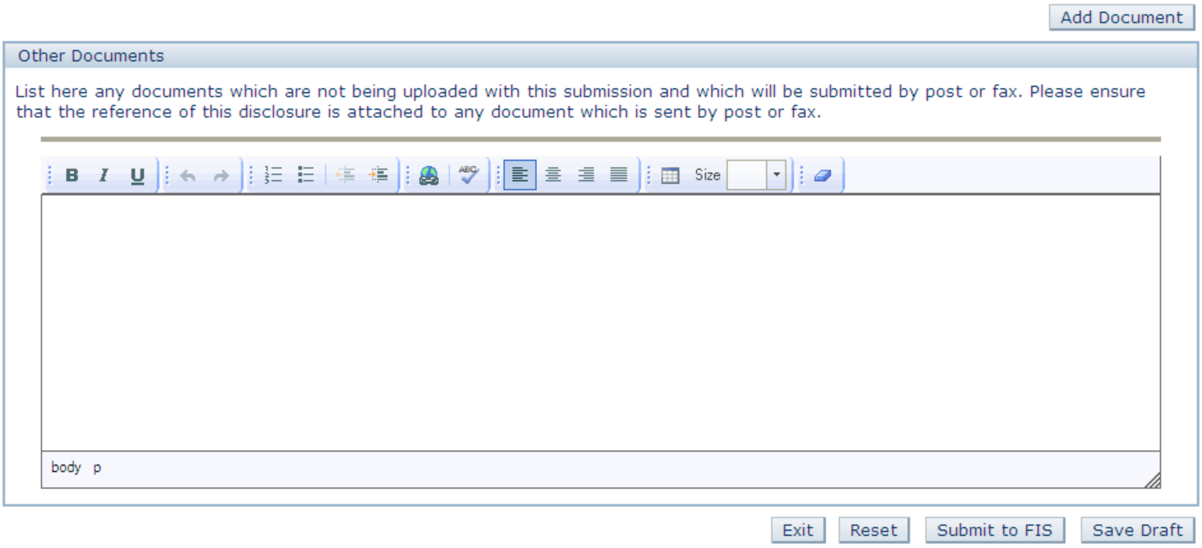


- This will open up the Edit Document Details screen.
- Click the Delete button.



- A message will appear asking you to confirm the deletion.
  - Clicking Cancel will close the message and remain on the Edit Document Details screen.
  - Clicking OK will permanently delete the attachment and redisplay the Attachments screen.

8.15.2 Other Documents



The bottom half of the Attachments screen is a scrolling free text field. This should be used to enter the details of any documents which will be submitted via post or fax.

This field can be edited on both pending and submitted disclosures.

To save the details of the Other Documents field

- Click the Save Draft or Save buttons.

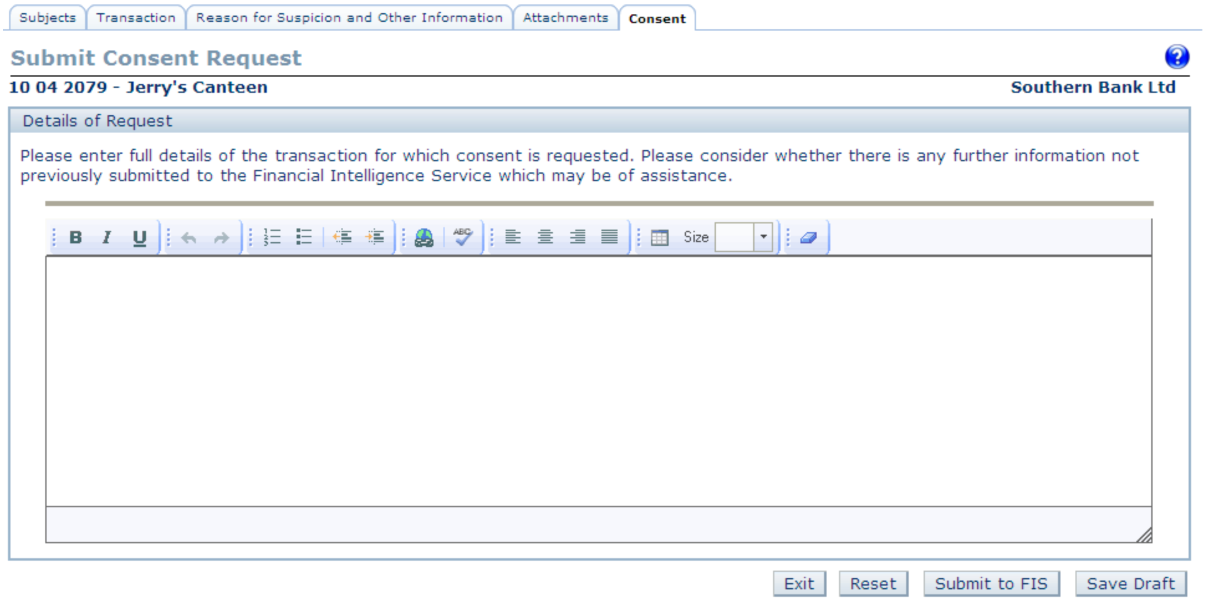
8.16 Consent Requests

8.16.1 Adding a Consent Request

Consent Requests can be added to Disclosures on the Consent Request tab.

8.16.1.1 Consent Requests on Pending Disclosures

Before the disclosure is submitted to FIS the Consent tab contains a single scrolling text box.



To submit a Consent Request along with the disclosure

- Enter the details of the request in the Details of Request field
- Click Save Draft

8.16.1.2 Consent Requests on Submitted Disclosures

At the bottom of the Consent Request screen for a submitted disclosure there is a Request Consent button.

To submit a new Consent Request on a submitted disclosure

- Click the Request Consent button

- ❖ The Submit Consent Request screen will open containing a single scrolling text box. This is similar to the screen that is displayed prior to the Disclosure being submitted.
- Enter the details of the request in the Details of Request field.
- Click Submit to send the request to FIS.
- ❖ The Consent Requests screen will be displayed and the new Consent Request will be listed in the datapager.

To cancel without submitting the request

- Click the Exit button.
- ❖ The Consent Request screen will be displayed.

8.16.2 Viewing Consent Requests

The Consent Request tab on a submitted disclosure contains a datapager listing all consent requests.

Consent Requests which have been submitted to FIS but have not yet been responded to will say Not Yet Received in the Date of Response column.

Consent Requests which have received responses from FIS will have a date of response in the Date of Response column in the datapager on the Consent Requests screen of the Disclosure.

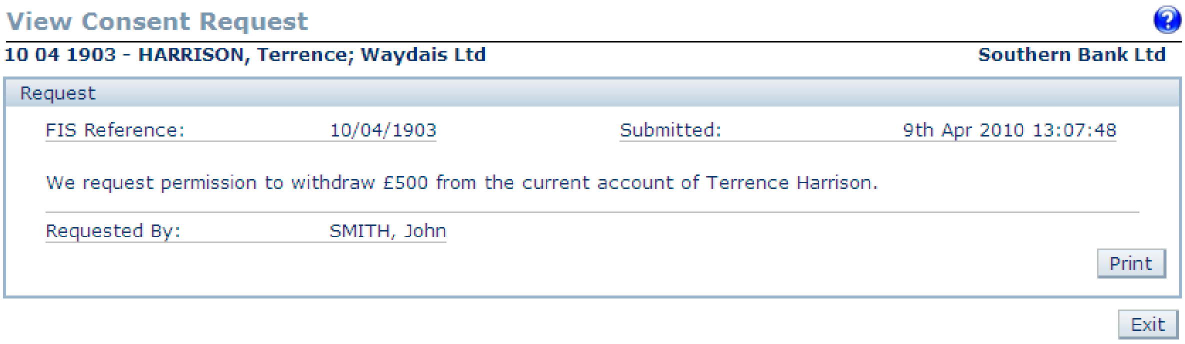
If the Consent Request has not been viewed by any user representing the organisation the Read / Unread status will be Unread.

8.16.2.1 Submitted Consent Requests

To view a submitted Consent Request

Click the View link for the Consent Request on the Consent Requests screen.

❖ If the Consent Request has not been responded to the details of the submitted request will be displayed in the View Consent Request screen.



To print a submitted Consent Request

- When viewing the submitted Consent Request. Click the Print button.

❖ This will create a PDF file containing the details of the consent request. The print function in the PDF viewer can then be used to print the Consent Request.

To exit a submitted Consent Request

- When viewing the submitted Consent Request. Click the Exit button

❖ The Consent Requests screen will be displayed.

8.16.2.2 Consent Request Responses

To view a Consent Request Response

- Click the View link for the Consent Request on the Consent Requests screen.

- If the Consent Request has been responded to the details of the submitted request will be displayed followed by the details of the response.

- ❖ Any attachments added to the Consent Request response by FIS will be listed at the bottom of the screen.
- Click the View link to open any attachments
- ❖ The attachment will open in the appropriate program provided it is installed on the computer of the user.

To exit a Consent Request Response

The first time a Consent Request Response is viewed by any user representing the organisation the only option to exit the screen is to click Exit and Mark as Read. If the consent request is viewed subsequently it is possible to click Exit.

- Click Exit or Exit and Mark as Read
  - ❖ If Exit and Mark as Read is clicked the Consent Request as marked as read for all users of the organisation.
- ❖ Consent Requests screen will be displayed.

To print a Consent Request Response

- Click the Print button on the Response
- ❖ This will create a PDF file containing the details of the consent request response. The print function in the PDF viewer can then be used to print the Consent Request Response.

To print both the response and the request it is necessary to use both Print buttons.

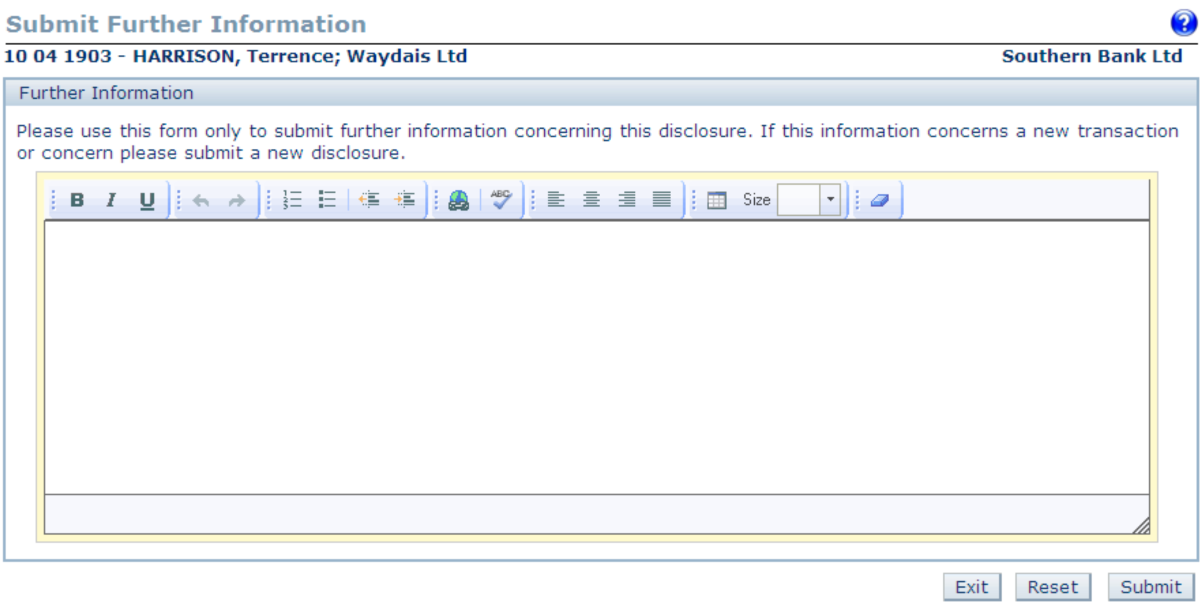
8.17 Further Information

Submitted Disclosures have a Further Information tab, to allow information that was not in the original submission to be added to the Disclosure.

8.17.1 Adding Further Information

At the bottom of the Further Information screen there is an Add Further Information button.

- Click the Add Further Information button
- The Submit Further Information Screen will open containing a single scrolling text box.
- Enter the information in this field.



- Click Submit to send the information to FIS.
- The View Further Information screen will be displayed, showing the details of the information which was just submitted.

Once Further Information has been submitted it is possible to view the information but it is not possible to edit it.

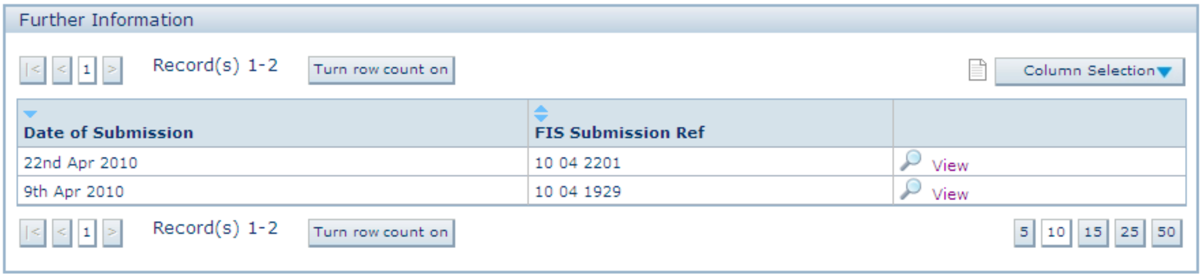
To cancel without submitting the information

- Click the Exit button
- The Further Information screen will be displayed.

Multiple pieces of Additional Information can be added if required.

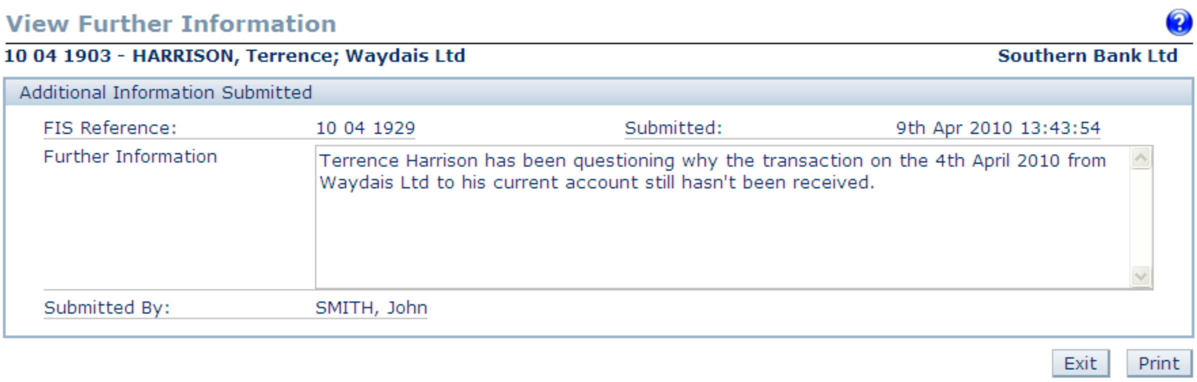
8.17.2 Viewing Further Information

Submitted information will be listed in a datapager on the Further Information screen.



To view the details of the information submitted

- Click the View link.
- This will open the View Further Information screen. The information cannot be edited as it has been submitted to FIS.



To print the Further Information

- Click the Print button
- This will create a PDF file containing the details of the Further Information. The print function in the PDF viewer can then be used to print the Further Information.

To return to the Further Information screen

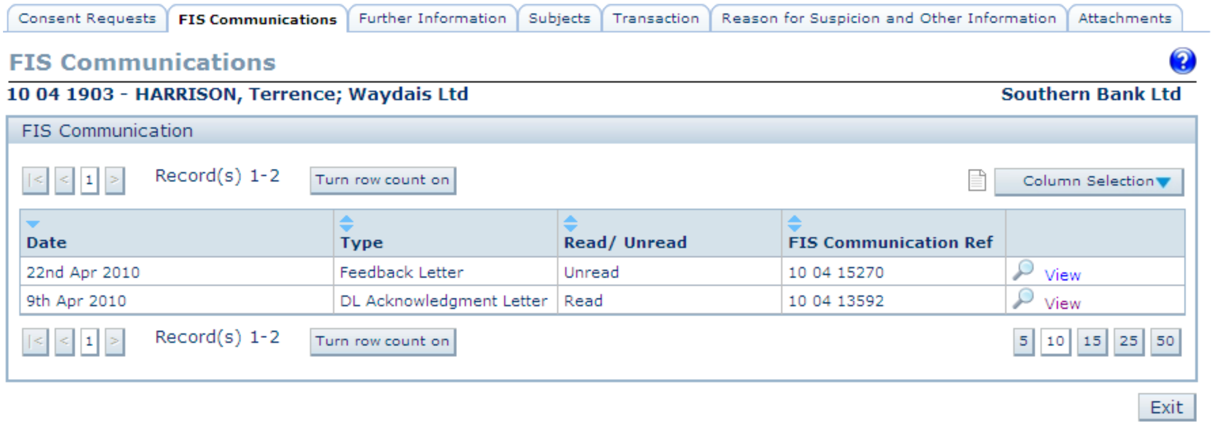
- Click the Exit button.

8.18 FIS Communications

Submitted Disclosures have a FIS Communications tab.

This screen lists communication sent from FIS regarding the disclosure.

Any FIS Communications sent regarding a Disclosure prior to a user beginning to represent the organisation will not appear in the FIS Communication tab for that user.



Date	Type	Read/ Unread	FIS Communication Ref	
22nd Apr 2010	Feedback Letter	Unread	10 04 15270	View
9th Apr 2010	DL Acknowledgment Letter	Read	10 04 13592	View

8.18.1 New FIS Communication

When a new FIS Communication is distributed to an organisation all MLRO portal users currently representing that organisation will receive email notification.

8.18.2 View FIS Communication

FIS Communication which has not been viewed by the user will have a Read / Unread status of Unread.

To view a FIS Communication

- Click the View link.
- ❖ This will open the View FIS Communication screen.

View FIS Communication

10 04 1903 - HARRISON, Terrence; Waydais Ltd — Southern Bank Ltd

Communication - DL Acknowledgment Letter

Ms S Duki
Southern Bank Ltd
Southern Comfort, Rue Jacques
St. Sampson
GY2 4NJ
Guernsey

Date :	09/04/2010
FIS Reference :	10 04 1903
Discloser Reference :	DSU-223-0410

PRIVATE & CONFIDENTIAL - ADDRESSEE ONLY

Dear Ms S Duki

Thank you for the disclosure of information you have provided under the provisions of The Disclosure (Bailiwick of Guernsey) Law, 2007 concerning:-

Mr Terrence Harrison

Waydais Ltd

The information has been noted.

Thank you for your continued co-operation.

Yours sincerely

On Behalf of Director

Exit & Mark as Read | Print

To print the FIS Communication

When viewing a FIS Communication

- Click the Print button.
- ❖ This will produce a file in PDF format. The print function in the PDF viewer can then be used to print the letter.

To exit the FIS Communication

The first time a FIS Communication is viewed by the user the only option to exit the screen is to click Exit and Mark as Read. If the FIS Communication is subsequently viewed it is possible to click Exit.

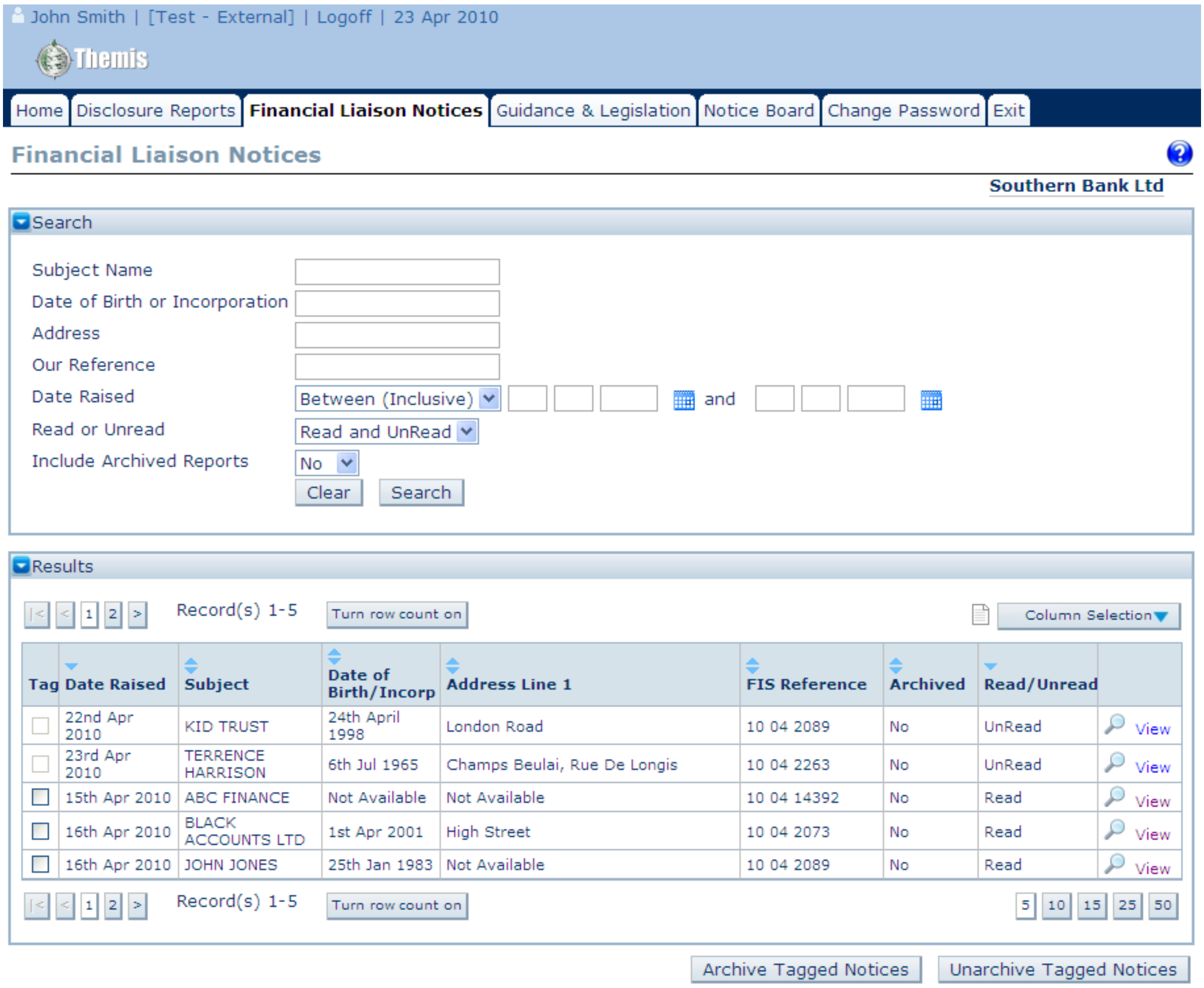
- Click Exit or Exit and Mark as Read
  - ❖ If Exit and Mark as Read is clicked the FIS Communication will be marked as read for that user only. It will remain unread for other users of the organisation.

❖ The FIS Communication screen of the disclosure will be displayed.

9 Financial Liaison Notices

Financial Liaison Notices distributed by FIS to the organisation will be listed in the Financial Liaison Notices area.

Any Financial Liaison Notices which were distributed prior to a user beginning to represent the organisation will not appear in the Financial Liaison Notices list for that user.



9.1 New Financial Liaison Notice

When a new Financial Liaison Notice is distributed to an organisation, all MLRO portal users currently representing that organisation will receive email notification.

9.2 Searching Financial Liaison Notices

The FLNs listed in the Financial Liaison Notices list can be filtered or searched using the Search fields at the top of the screen.

The following fields are available to search Financial Liaison Notice.

- Subject Name
- Date of Birth or Incorporation
- Address
- Our Reference
- Date Raised. This can be used to return FLNs entered within specified date ranges as well as on specific dates by using the options provided in the dropdown list.
    - Between (inclusive)
    - On
    - Before
    - On or Before
    - After
    - On or After
- Read or Unread
- Include Archive Reports

To search for a specific Financial Liaison Notice or Notices

Enter the criteria in the Search fields at the top of the page

Click Search

❖ The screen will reload the screen and display any FLNs which match the entered search criteria in the Financial Liaison List.

To reset the search

Click Clear

❖ The search criteria will be reset to their default values and the Financial Liaison List datapager will be reset to contain all non-archived Financial Liaison Notices.

9.3 Sorting Financial Liaison Notices

The FLNs are initially sorted by Date Raised in descending order with any unread notices displayed first.

It is possible to temporarily amend the sort order by clicking the column names on the notices list. The notices list can be sorted by the following columns.

- Date Raised
- Subject
- Date of Birth / Incorporation
- Address Line 1
- FIS Reference
- Archived
- Read / Unread

For more information on sorting datapagers see Section 6.4.7 Sorting.

9.4 Archiving and Unarchiving Financial Liaison Notices

It is possible to archive Financial Liaison Notices from the Financial Liaison Notices list.

Archived Notices are not initially visible, it is necessary to modify the Search Criteria to include Archived Reports to view FLNs which have been archived.

To archive one or more notices

- Select the checkbox(es) next to the notice(s)
- Click the Archive Tagged Notices button.

It is not possible to archive notices which have not been read by the user.

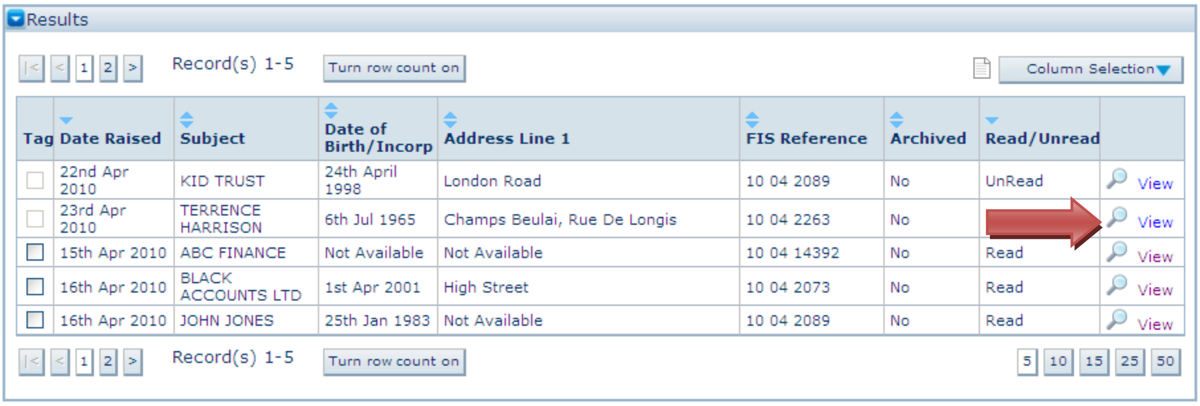
Archiving a notice only affects the visibility of the Finanical Liaison Notice on the Financial Liaison Notices screen for the represented organisation. FIS will not be notified that an FLN has been archived.

To unarchive one or more notices

- Select the checkbox(es) next to the notice(s)
- Click Unarchive Tagged Notices.

When a user archives or un-archives a notice it will become archived or un-archived for all users of the currently represented organisation, regardless of whether they have read it or not.

9.5 Viewing Financial Liaison Notices



Results

|< < 1 2 > Record(s) 1-5 Turn row count on Column Selection

Tag	Date Raised	Subject	Date of Birth/Incorp	Address Line 1	FIS Reference	Archived	Read/Unread	
	22nd Apr 2010	KID TRUST	24th April 1998	London Road	10 04 2089	No	UnRead	View
	23rd Apr 2010	TERRENCE HARRISON	6th Jul 1965	Champs Beulai, Rue De Longis	10 04 2263	No		View
	15th Apr 2010	ABC FINANCE	Not Available	Not Available	10 04 14392	No	Read	View
	16th Apr 2010	BLACK ACCOUNTS LTD	1st Apr 2001	High Street	10 04 2073	No	Read	View
	16th Apr 2010	JOHN JONES	25th Jan 1983	Not Available	10 04 2089	No	Read	View

|< < 1 2 > Record(s) 1-5 Turn row count on 5 10 15 25 50

- Click the View link next to a Financial Liaison Notice
- ❖ The View Financial Intelligence Notice screen will open.

View Financial Liaison Notice

The Bank of Mum & Dad

NOT PROTECTIVELY MARKED

The Bank of Mum & Dad

Date : 07/06/2010
FIS Reference : 10 06 997
Discloser Reference :

PRIVATE & CONFIDENTIAL - ADDRESSEE ONLY

Dear Sir

THIS INFORMATION IS CIRCULATED IN THE STRICTEST CONFIDENCE AND SHOULD NOT BE COMMUNICATED OUTSIDE POLICE, CUSTOMS AND FINANCIAL SERVICES BUSINESSES. UNAUTHORISED OR IMPROPER DISCLOSURE OF THE CONTENTS OF THIS NOTICE MAY CONSTITUTE A CRIMINAL OFFENCE.

The following individual has been arrested and charged with

Name: Higgins Trading
Date of Incorporation: 15th Jan 2002
Address: 58, Rue Jehannet, St. Martin, Guernsey, GY4 6JZ

Members are asked to check their records to establish if the above named hold(s) any accounts locally.

Should any account or other form of business relationship come to light concerning the person(s) mentioned, please contact the Financial Intelligence Service. Any queries that arise will be dealt with in the strictest confidence.

Yours sincerely

On Behalf of Director

Exit & Mark as Read | Print | Create Disclosure Report

To print the Financial Liaison Notice

When viewing a Financial Liaison Notice

- Click the Print button.
- ❖ This will produce a file in PDF format. The print function in the PDF viewer can then be used to print the notice. The PDF formatted Financial Liaison Notice includes additional formatting.

To exit the Financial Liaison Notice

The first time a Financial Liaison Notice is viewed by the user the only option to exit the screen is to click Exit and Mark as Read. If the Financial Liaison Notice is subsequently viewed it is possible to click Exit.

- Click Exit or Exit and Mark as Read
    - ❖ If Exit and Mark as Read is clicked the FLN will be marked as read for that user only. It will still appear as unread for other users.
- ❖ The Financial Liaison Notice List screen will be displayed.

9.6 Creating a Disclosure from a FLN

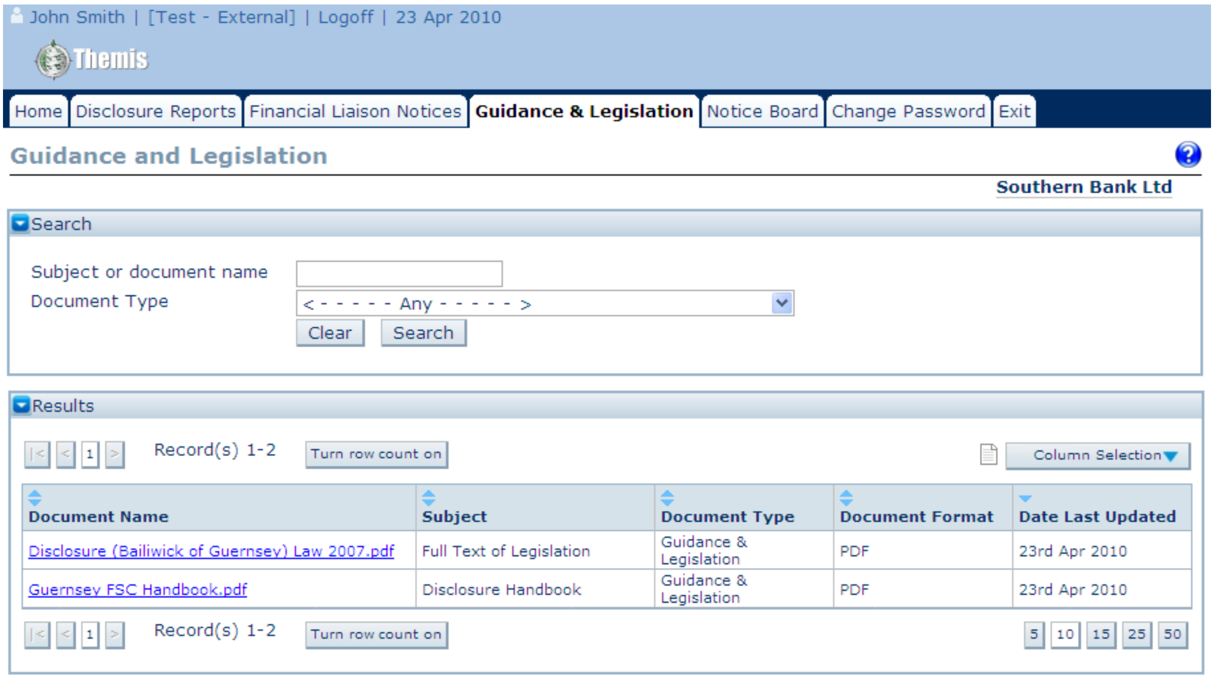
It is possible to create a disclosure directly from an FLN by using the Create Disclosure Report button on the View Financial Liaison Notices screen.

For more information on creating disclosures from FLNs see Section 8.9.2.

10 Guidance and Legislation

The Guidance and Legislation area will contain documents submitted for the information of users of the MLRO portal by FIS.

Guidance and Legislation Documents will appear for all users as long as the information is current.



10.1 New Guidance and Legislation

When a new Guidance and Legislation document is distributed by FIS users of the MLRO portal will receive email notification.

10.2 Searching Guidance and Legislation

The Guidance and Legislation listed can be filtered or searched using the Search fields at the top of the screen.

The following fields are available to search Guidance and Legislation.

- Subject or document name
- Document Type

To search for a specific Guidance and Legislation

- Enter the criteria in the Search fields at the top of the page
- Click Search
- ❖ The screen will reload the screen and display any Guidance and Legislation which match the entered search criteria in the Guidance and Legislation List.

To reset the search

- Click Clear
- ❖ The search criteria will be reset to their default values and the Guidance and Legislation List datapager will be reset to contain all Guidance and Legislation records.

10.3 View a Guidance and Legislation document

- Locate the Guidance and Legislation Document in the Guidance and Legislation list.
- Click the document name
- ❖ This will open the attachment in an appropriate program, if an appropriate program is installed on the user's computer.

10.4 Sorting Guidance and Legislation

The Guidance and Legislation are initially sorted by Date Last Updated in descending order.

It is possible to temporarily amend the sort order by clicking the column names on the datapager. The guidance and legislation list can be sorted by the following columns.

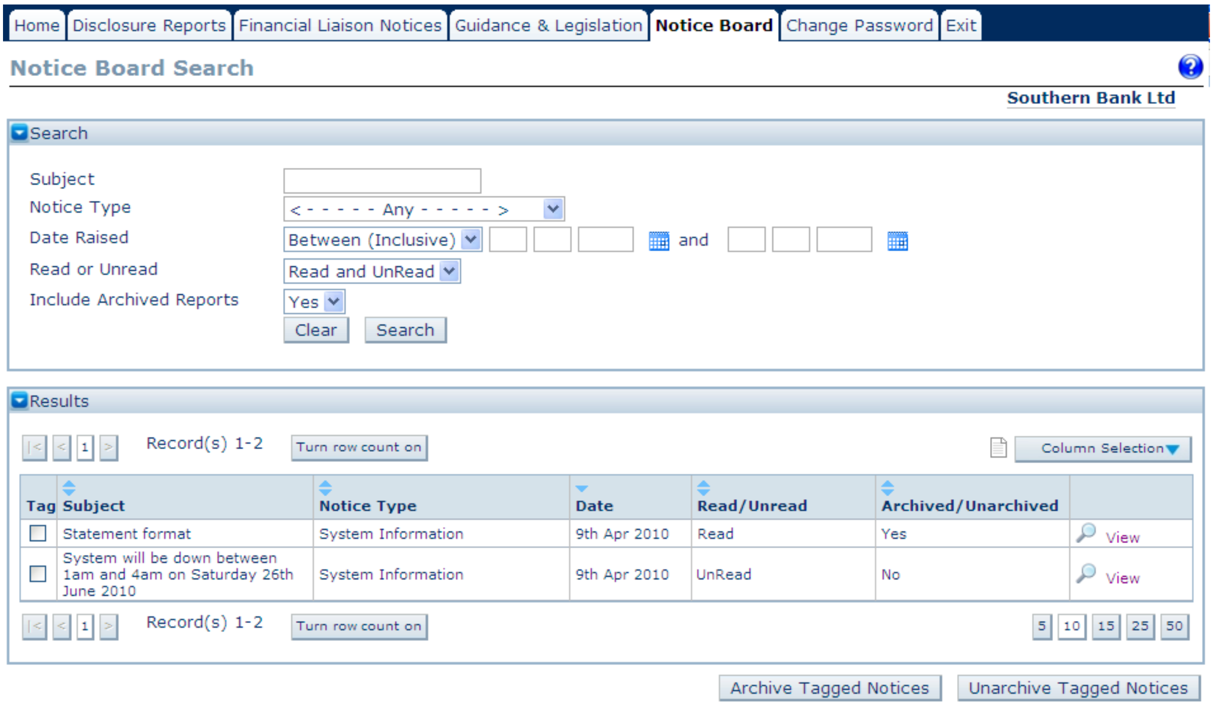
- Document Name
- Subject
- Document Type
- Document Format
- Date Last Updated

For more information on sorting datapagers see Section 6.4.7. Sorting.

11 Notice Board

The Notice Board will contain Notices submitted for the information of users of the MLRO portal by FIS. A Notice may contain general information for all users or information specific to organisation.

Financial Liaison Notices distributed by FIS to the organisation will be listed in the Financial Liaison Notices area.



11.1 New Notice

When a new Notice is distributed to an organisation, all MLRO portal users currently representing that organisation will receive email notification.

11.2 Searching Notices

The Notices listed in the Notice Board can be filtered or searched using the Search fields at the top of the screen.

The following fields are available to search Notices.

- Subject
- Notice Type
- Date Raised. This can be used to return FLNs entered within specified date ranges as well as on specific dates by using the options provided in the dropdown list.
  - Between (inclusive)
  - On
  - Before

    - On or Before
    - After
    - On or After
- Read or Unread
- Include Archive Reports

To search the notices

- Enter the required search criteria at the top of the screen.
- Click Search
- ❖ The screen will reload and display any Notices which match the entered search criteria in the Notice Board in the lower half of the screen.

To reset the notice board

- Click Clear
- ❖ The screen will reload and the search criteria will reset to their default values and the Notice Board datapager will contain all non-archived notices.

11.3 Sorting Notices

The Notices are initially sorted by Date Raised in descending order with any unread notices displayed first.

It is possible to temporarily amend the sort order by clicking the column names on the Notice Board. The notices list can be sorted by the following columns.

- Subject
- Date
- Read / Unread
- Archived / Unarchived

For more information on sorting datapagers see Section 6.4.7 Sorting.

11.4 Archiving and Unarchiving Notices

It is possible to archive a Notice from the Notice Board.

Archived Notices are not initially visible, it is necessary to modify the Search Criteria to include Archived Reports to view Notices which have been archived.

To archive one or more notices

- Select the checkbox(es) next to the notice(s)
- Click the Archive Tagged Notices button.

- The selected reports will set to an archived status

It is not possible to archive notices which have not been read by the user.

Archiving a notice only affects the visibility of the notice on the Notice Board for the represented organisation. FIS will not be notified that a notice has been archived.

To unarchive one or more notices

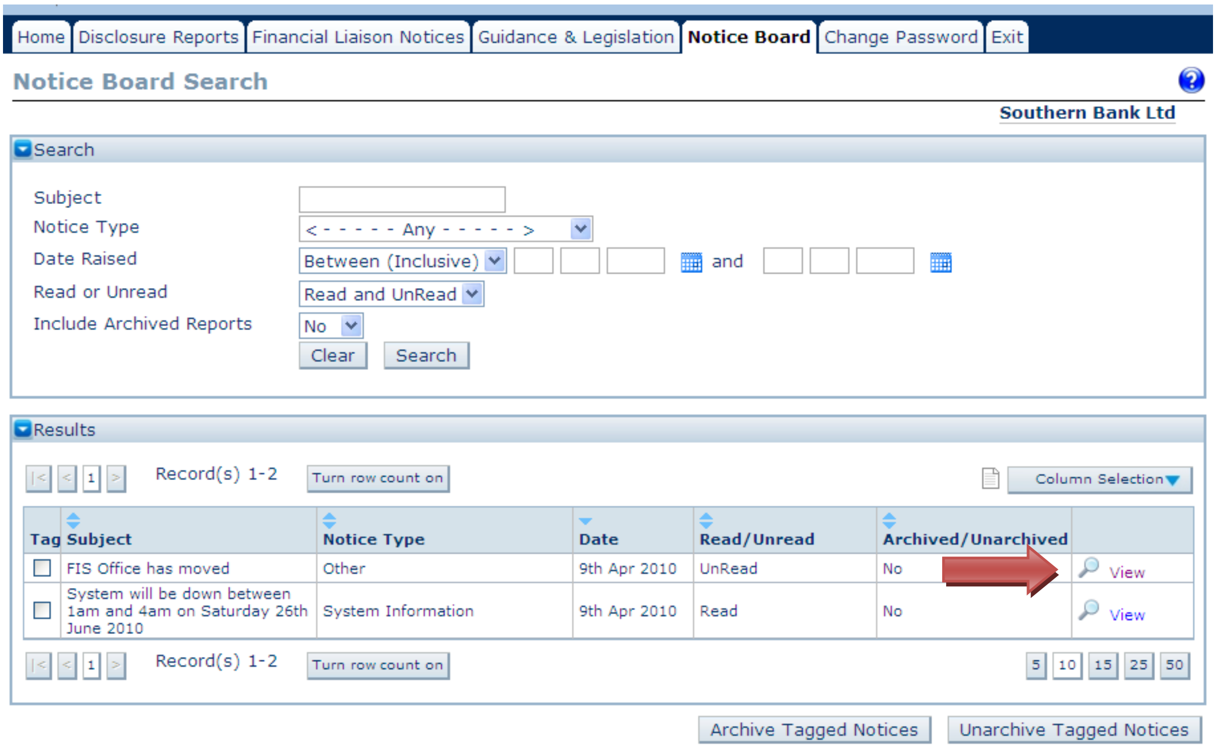
- Select the checkbox(es) next to the notice(s)
- Click Unarchive Tagged Notices
- The selected reports will set to an archived status

When a user archives or un-archives a notice it will become archived or un-archived for all users of the currently represented organisation, regardless of whether they have read it or not.

11.5 Viewing and Printing Notices

To view a Notice

- Click the View link next to a Notice.



- This will open the View Notice screen.

View Notice

Southern Bank Ltd

Notice Detail

THIS INFORMATION IS CIRCULATED IN THE STRICTEST CONFIDENCE AND SHOULD NOT BE COMMUNICATED OUTSIDE THE POLICE, CUSTOMS AND FINANCIAL SERVICES BUSINESSES. UNAUTHORISED OR IMPROPER DISCLOSURE OF THE CONTENTS OF THIS NOTICE MAY CONSTITUTE A CRIMINAL OFFENCE.

Notice Type - System Information

System will be down between 1am and 4am on Saturday 26th June 2010

The Themis MLRO system will be down for essential maintenance between 1am and 4am on Saturday 26th June 2010.

An 'Undergoing Maintenance' screen will be displayed. Please see attached for an example.

Any users logged into the system at 1am on Saturday 26th June will be automatically logged out, any unsaved work will be lost.

We apologise for any inconvience this may cause.

Themis System Administrators.

Message Created 15:56 09/04/2010

Attachments

Document Name	Subject	Document Format
Screen.JPG	Example of screen which will be displayed during maintenance	JPG Image

Exit & Mark as Read Print

❖ Some notices may have attachments. These will be listed at the bottom of the screen.

To view an attachment

- Click the Document name.

❖ This will open the attachment in an appropriate program, if an appropriate program is installed on the user's computer.

To print a Notice

- Click the Print button

❖ This will create a file in PDF format of the notice. The print function in the PDF viewer can then be used to print the Notice.

Attachments will be listed in the PDF but not printed. The attachments should be printed separately using the print function within the program they are opened in.

To exit from viewing a Notice

The first time a Notice is viewed by a user the only option to exit the screen is to click Exit and Mark as Read. If the Notice is subsequently viewed it is possible to click Exit.

- Click Exit or Exit and Mark as Read

    ❖ If Exit and Mark as Read is clicked the Notice will be marked as read for that user only.

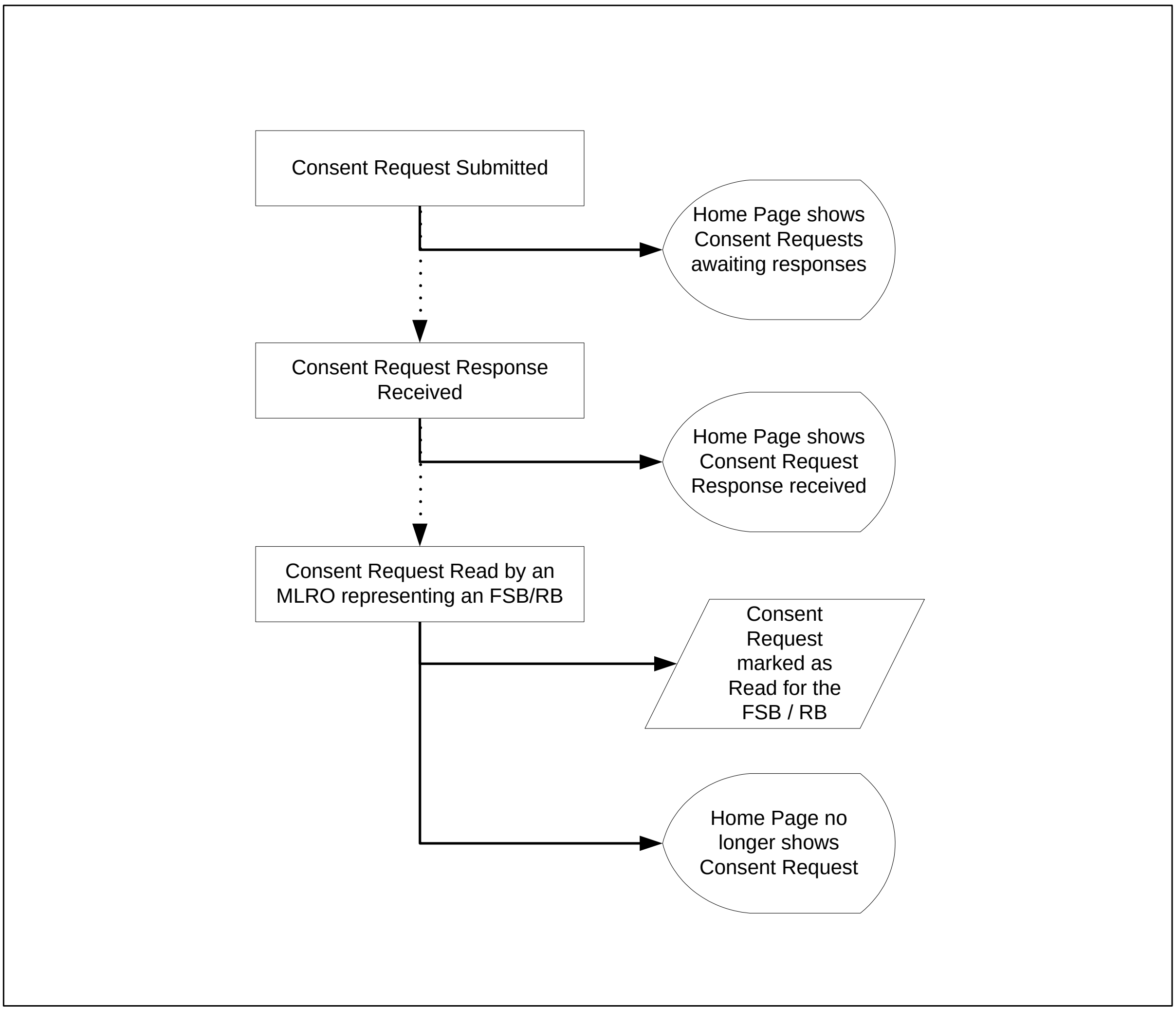
❖ The Notice Board will be displayed.

Appendix A. Workflow

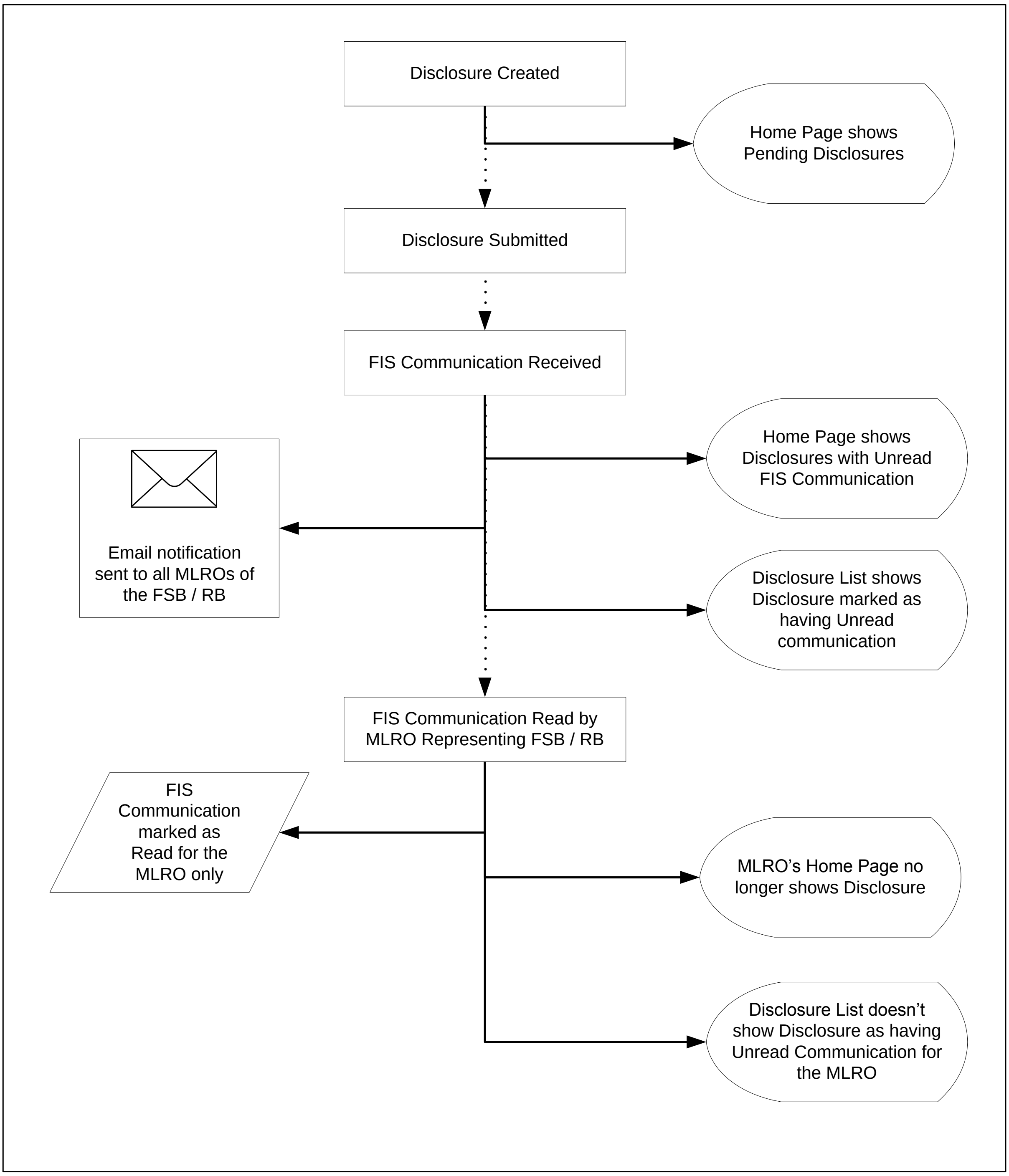
Email notification, the ability to mark items as ‘read’, and the homepage have all been implemented into the MLRO Portal to assist users to easily identifying records which are in progress or need attention.

The following four diagrams illustrate how the system is updated when Disclosures, Consent Requests, Financial Intelligence Notices, Guidance & Legislation and Notices change status.

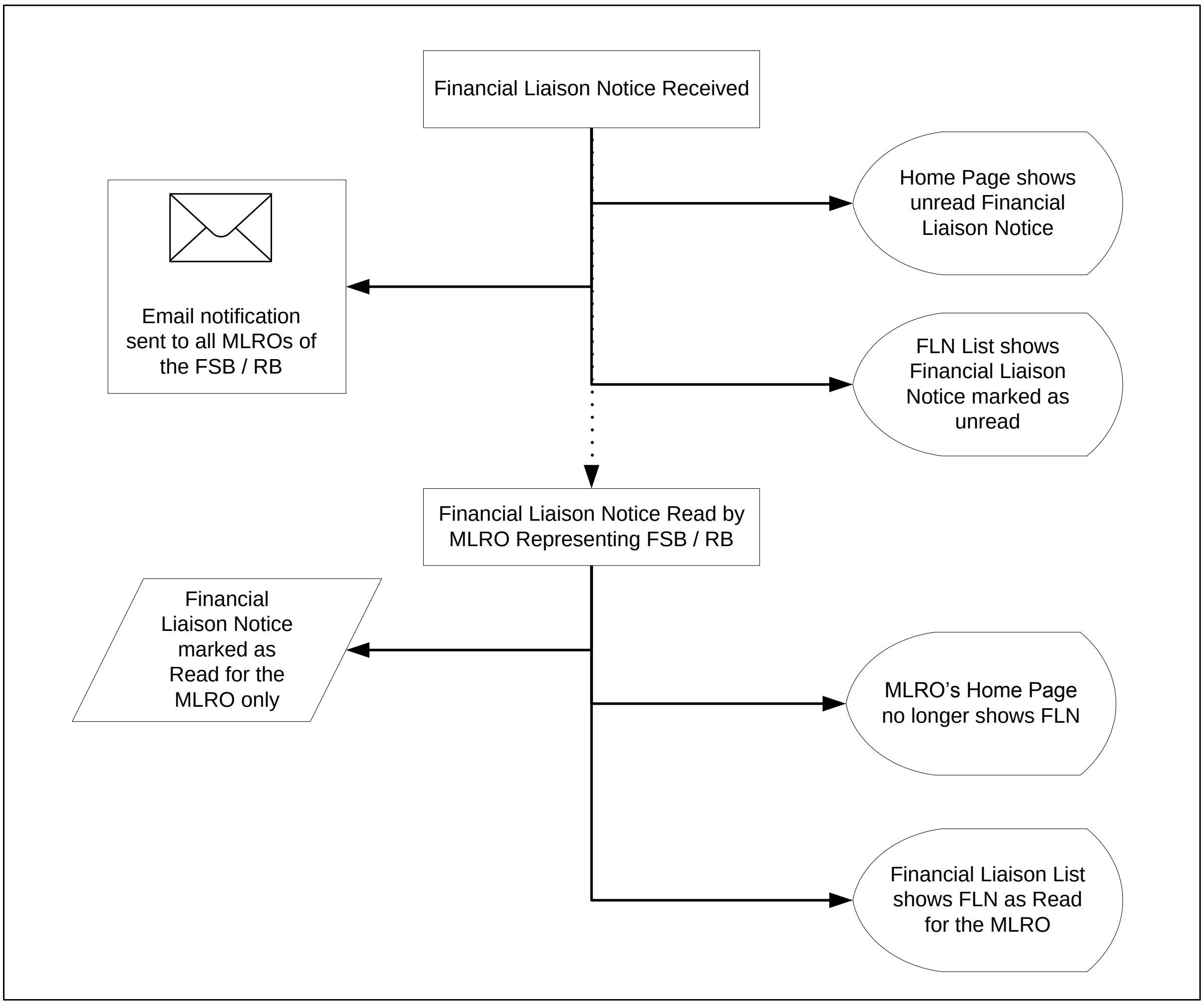
11.6 Consent Request Workflow



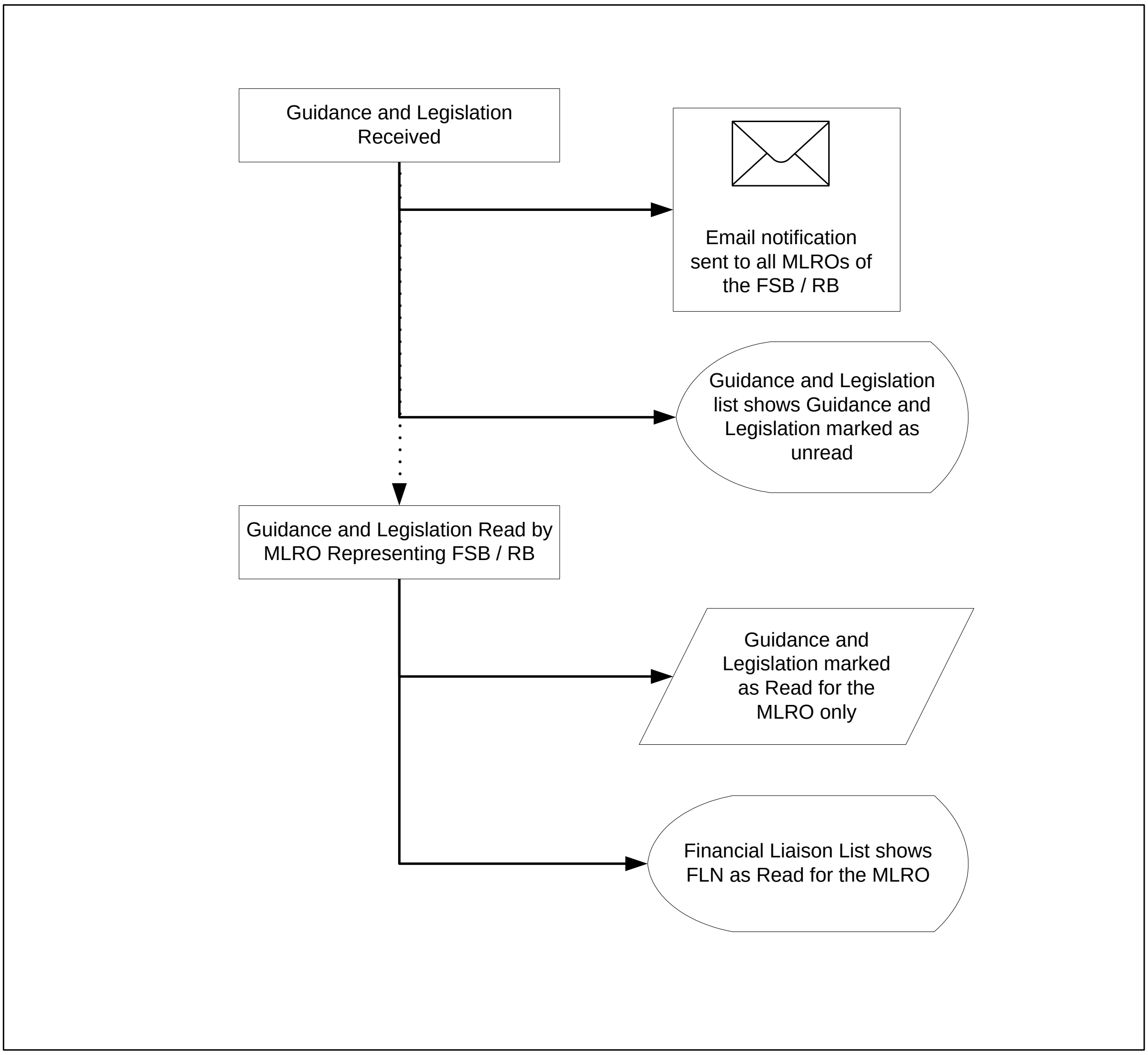
11.7 Disclosure and FIS Communication Workflow



11.8 Financial Liaison Notice Workflow



11.9 Guidance and Legislation Workflow



11.10 Notices Workflow