

smartWorking COMPLIANCE

Embeds Compliance in your Corporate DNA



INTEGRATED COMPLIANCE SOLUTION

POLICY USAGE DAY-TO-DAY & POLICY MANAGEMENT

CHALLENGES REGULATED INSTITUTIONS ARE FACING ON COMPLIANCE



TREMENDOUS INCREASE OF REGULATIONS FOR REGULATED INSTITUTIONS



MARGIN OF ERROR IS VERY LOW BY THE REGULATOR, SHAREHOLDER, PUBLIC



INCREASING EQUITY REQUIREMENTS



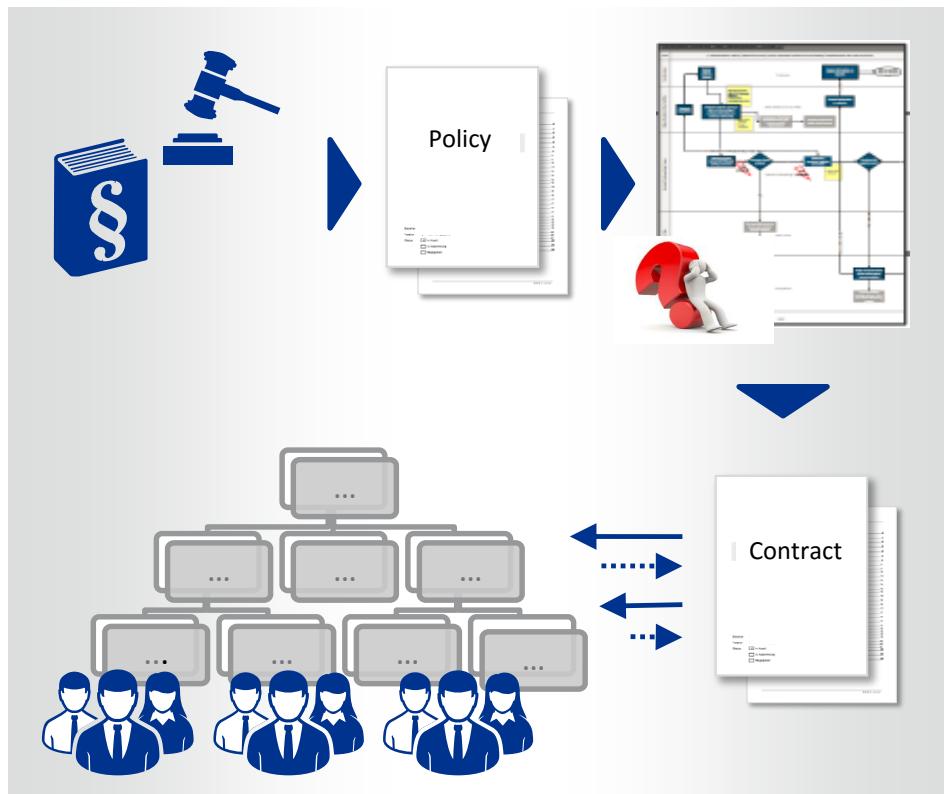
RISING WORKFLOW COMPLEXITY



INCREASING FINES WITH LONG-TERM AFTERMATH

VOLATILE AND DYNAMIC REGULATION CHANGES ENFORCE ONGOING ADAPTIONS

- Institutions must assure and prove that their workforce has access, understands and applies to relevant policies and informations
- The variety of regulations and standards enforces a **permanent change** in internal compliance documentation
- The review and approval processes are **complex and time consuming**
- The publication and the information must be **understandable and comprehensible**
- The regulations and compliance documentations must be **known immediately for decision making activities** of employees and must be **implementable**



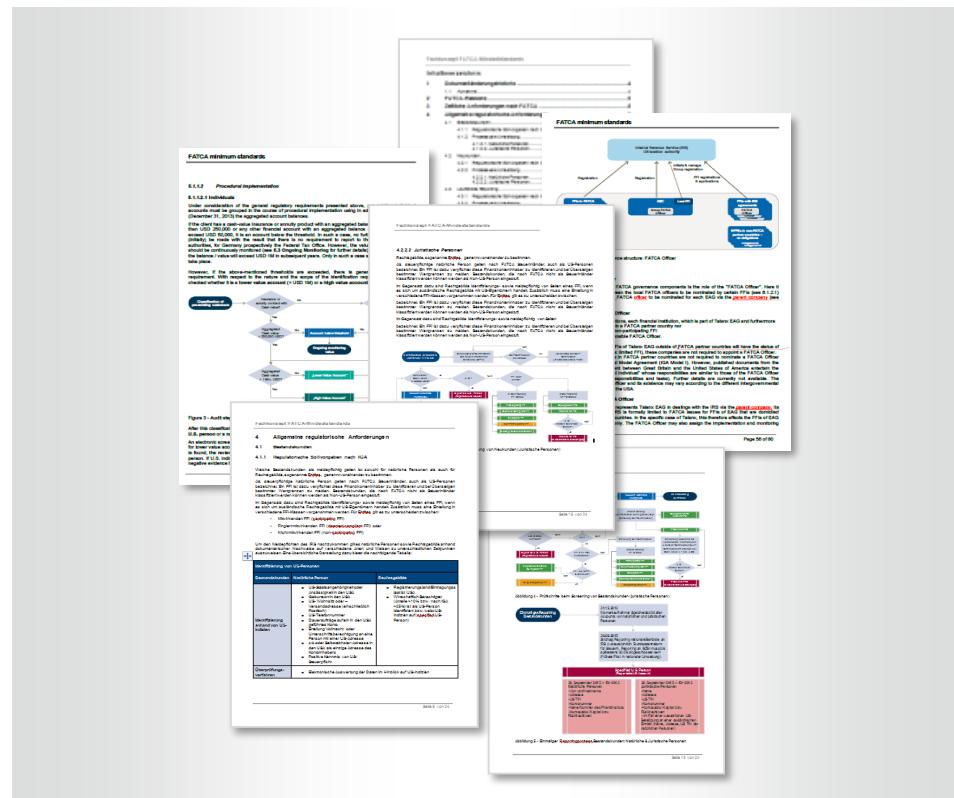
DEALING WITH THE VARIETY OF REGULATIONS AND INSTRUCTIONS IN BUSINESS AND DECISION

- Employees must have access to **all necessary information – fast, easy, comprehensive, at a glance and up to date**
- **Employees are liable and hold accountable –**
Institutions are limited by level of protection
- **The search for the appropriate and relevant information in employees daily working tasks is often time consuming and interrupts the working processes**



Which **options for action** are given in a **dedicated decision** situation

Where can employees find the '**right**' **tools** and business applications in the **context of the situation**



STRENGTHENING COMPLIANCE THROUGH INTEGRATION INTO DAY TO DAY OPERATIONS

CONTENT-MANAGEMENT

- Recognition of redundancies and incongruities
- Structured and collaborative creation of content

ESSENTIALITY & RISK ANALYTICS

- Collaborative Laws and Rules analytics
- Structured and collaborative creation of Control and Procedures

POLICY-MANAGEMENT

- User oriented, testing secure publication of the Organization's policies

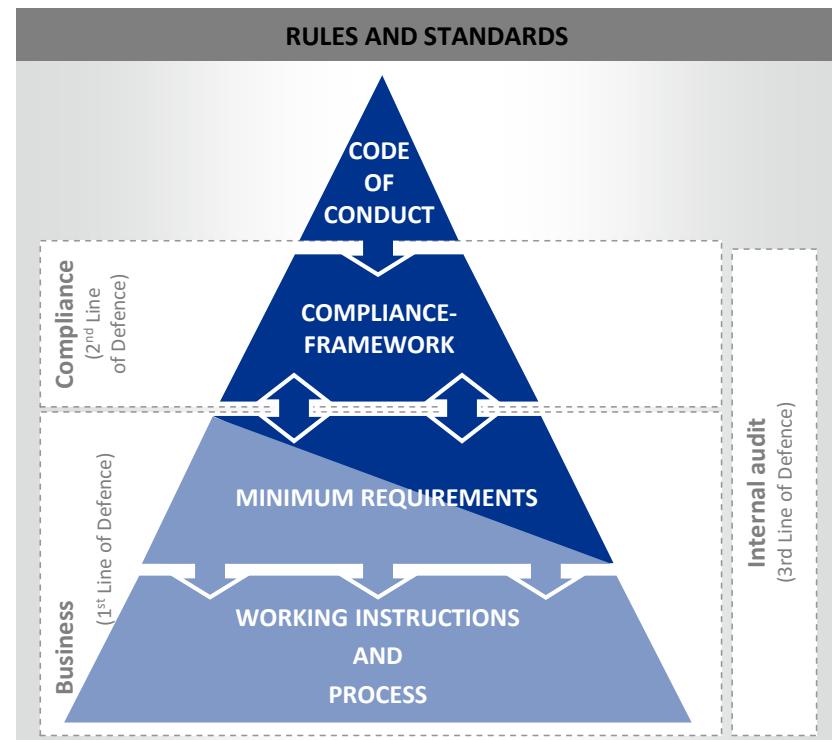
WORKFLOW-MANAGEMENT

- comprehensible review and approval processes in regulations documentation processes

SEARCH, FIND AND ACT

- Only **relevant information at the right time** regarding the **right context**

EFFECTIVE AND EFFICIENT COMPLIANCE WITH COMBIONICS SOLUTION



THE SOLUTION OF COMBIONIC IS A UNIQUE AND EASY ADAPTABLE OFFICE ADD IN

COMPLIANCE EMBEDDED INTO THE DAILY WORK

- ✓ User friendly and situational application of relevant information in the daily working environment
- ✓ Integrated overview of policies and related compounds to regulations, laws and other related information



TEAM WORK ON COMPLIANCE POLICY DOCUMENTS IS GUIDED AND MORE PRODUCTIVE

- ✓ Standardization and optimization of the creation process
- ✓ Structured Essentiality & Risk Analytics
- ✓ Central repository for all information – persistency, traceability and versioning

PROVIDES EMPLOYEES WITH RELEVANT INFORMATION & DOCUMENTS ON WORK CONTEXT

- ✓ Integrated in productivity environment as Microsoft Outlook, Word, Excel and PowerPoint and day-to-day tasks
- ✓ Repository for all compliance Content
- ✓ Gives employees as Authors the capabilities to write, review, update and manage all needed Compliance documents in a transparent, structured and auditable way, directly in Microsoft Office Applications.

USAGE OF AN ENTERPRISE PLATFORM

- ✓ Integrate the solution in your security- and entitlement infrastructure
- ✓ Individual adaption of templates, analyses, dashboards and process step

A USER CAN FOR EXAMPLE COMPARE CONTENT OF VARIOUS POLICIES WITH POSSIBLE OVERLAPPING, DUPLICATION OR DIVERGENCES TO DETECT AND CORRECT IT

The screenshot displays two windows side-by-side. The left window is titled 'Semantic Search' and shows 'Semantic Search Results' for a document. It lists four sections with their respective document, paragraph, and similarity scores:

- Document: 1-p-000748.docx, Paragraph: 56, Similarity: 0.486722853572909. Text: Each Business Division must establish and maintain an effective AML Programme designed to achieve the Group's AML Objectives. The Programme must include: The avoidance of unwanted business relationships, activities and associated transactions: (see section 3)
- Document: 1-p-000748.docx, Paragraph: 175, Similarity: 0.453541969302644. Text: Business Divisions must create, implement and maintain a risk based framework for appropriate screening and monitoring controls to identify, where possible block, investigate and, where appropriate, report unusual and potentially suspicious
- Document: 1-p-000748.docx, Paragraph: 71, Similarity: 0.452460293461421. Text: Procedures for the investigation of unusual and potentially suspicious transactions and, where appropriate, reporting to the relevant authorities: (see section 8) The implementation of status reports (see section 9), detailing how the Programme is performing against the Group AML
- Document: 1-p-000748.docx, Paragraph: 176, Similarity: 0.428888273619682. Text: Business Divisions must create, implement and maintain a risk based framework for appropriate screening and monitoring controls to identify, where possible block, investigate and, where appropriate, report unusual and potentially suspicious transactions being carried out by COMBIONIC clients or

The right window is titled 'Adaptive Content View' and shows a 'Money Laundering' policy. It includes the combionic logo and tagline 'WE MAKE DOCUMENTS INTELLIGENT'. The policy content is displayed with sections like 'What is this policy?' and 'Who does this policy apply to?'. The 'Who does this policy apply to?' section lists categories and their status:

Location	All
Legal Entity	All
Business Division	All
Business Area	All
Roles	All

The publishing and distribution of compliance documents are communicated legally approved to the target audience.

By perusal and use of the information contained in our system communication, the recipient confirms that he is aware of the communicated regulations set.



Office Business Gateway
Neue Veröffentlichung

Policy Compliance-Funktion nach MaRisk

Policy
Compliance-Funktion nach MaRisk

Geltungsbereich

Gesellschaftsschlüssel	OE-Name
1 / 2 / 13 / 14	---

Policy ID: COPolicy-37043-10 Scope: Global Policy
Created Date: 01/01/2010 Contact: Kristin Grown
Last Revised Date: 31/01/2012

Ihre Fragen und Ihr Feedback
Bitte treten Sie mit uns bei allen Fragen oder Unsicherheiten direct mit uns in Kontakt. Dazu stehen Ihnen die beiden Optionen 'Ask' und 'Feedback' zur Verfügung.

Training und Test
Damit wir mögliche Haftungen wegen Organisationsmängeln ausschließen können, wurde mit dieser Notifikation in Ihrem Outlook-Kalender ein Terminvorschlag für ein entsprechendes Online-Training eingestellt sowie eine entsprechende Aufgabe zugewiesen. Selbstverständlich können Sie den vorgeschlagenen Termin zeitlich Ihren persönlichen Bedingungen in einem Rahmen von +/- einem Monat anpassen.

Add to My Calendar Add to My Policies
Answered On: 27.10.2014 Answered By: Karl-Heinz Sternemann
Commitment Ask Feedback

WORKFLOW MANAGEMENT

Structured, transparent, flexible and auditable adjustments and approval processes

The image shows a Microsoft Word document and a workflow management application interface side-by-side.

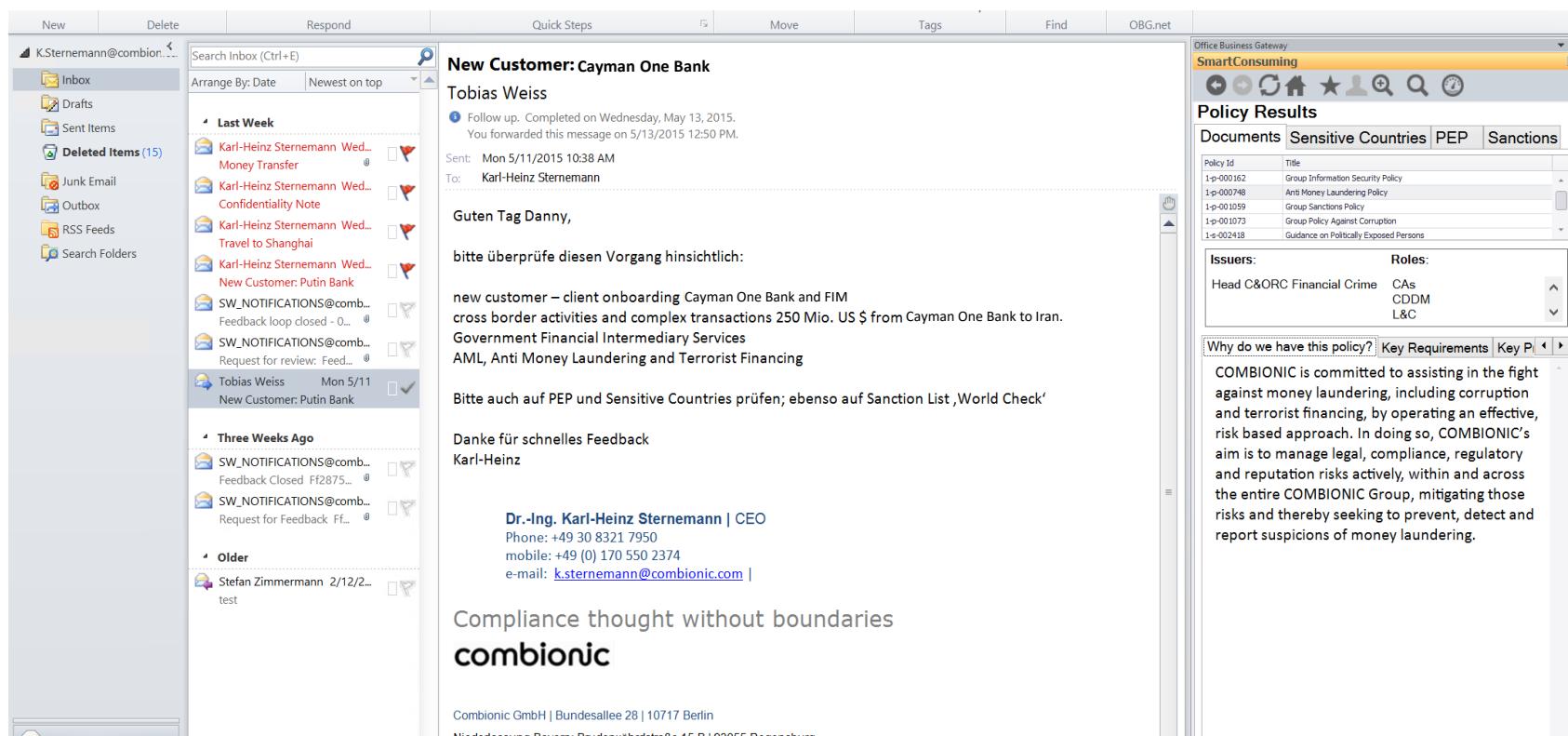
Microsoft Word Document Content:

- Header:** DATEI, START, EINFÜGEN, ENTWURF, SEITENLAYOUT, VERWEISE, SENDUNGEN, ÜBERPRÜFEN, ANSICHT.
- Toolbar:** Calibri (Textkörper), 12, A⁺, A⁻, Aa⁺, Aa⁻, Schriftart, Absatz, Schutz.
- Text:** Anweisung, Verantwortlich: Compliance, Kreditinstitut/Versicherung, Seite: Gültig ab:.
- Section:** Policy, Compliance-Funktion nach MaRisk.
- Table:** Geltungsbereich, Gesellschaftsschlüssel: 1 / 2 / 13 / 14, OE-Name: ---.

Workflow Management Application:

- Header:** IP2 - Request Detail Process, Karl-Heinz Sternemann.
- Request Overview:** REQ00036 / 08154711 / Translations Testdurchlauf.
- Status:** Manage Request, Due Date: 7/27/2015, 89 days of 89 days left.
- Request Details:** Initialize Request (Initiator), Manage Request (Line Manager), Division Check (Gatekeeper), Validate Request (Policy Training), Write Draft (Author), Experts Review (non mandatory), Functional Review (non mandatory), Division Review (mandatory), Mand. Consultation (mandatory), Policy Sign-Off (non mandatory), Prepare Publishing (Author), Translation.
- Buttons:** Commitment, Ask, Feedback, Add to MyPolicies.

Relevant compliance documents are automatically recommended in the context of e.g. an E-Mail content



The screenshot shows an email inbox interface with a list of messages on the left and an open email message on the right. The open message is from 'Tobias Weiss' with the subject 'New Customer: Cayman One Bank'. The message body contains several paragraphs of text, including a follow-up note, travel details, and a request for review. To the right of the message, a 'Policy Results' panel is displayed, showing a table of recommended documents and their details. The table includes columns for Policy Id, Title, Sensitive Countries, PEP, and Sanctions. The 'Title' column lists: 'Group Information Security Policy', 'Anti Money Laundering Policy', 'Group Sanctions Policy', 'Group Policy Against Corruption', and 'Guidance on Politically Exposed Persons'. The 'PEP' column shows 'Head C&ORC Financial Crime' and the 'Sanctions' column shows 'CAs', 'CDDM', and 'L&C'.

Policy Id	Title	Sensitive Countries	PEP	Sanctions
1-p-000162	Group Information Security Policy			
1-p-000748	Anti Money Laundering Policy			
1-p-001059	Group Sanctions Policy			
1-p-001073	Group Policy Against Corruption			
1-p-002418	Guidance on Politically Exposed Persons			

Policy Results

Documents

1-p-000162 Group Information Security Policy
 1-p-000748 Anti Money Laundering Policy
 1-p-001059 Group Sanctions Policy
 1-p-001073 Group Policy Against Corruption
 1-p-002418 Guidance on Politically Exposed Persons

Issuers: Head C&ORC Financial Crime
Roles: CAs, CDDM, L&C

Why do we have this policy? Key Requirements | Key P
 COMBIONIC is committed to assisting in the fight against money laundering, including corruption and terrorist financing, by operating an effective, risk based approach. In doing so, COMBIONIC's aim is to manage legal, compliance, regulatory and reputation risks actively, within and across the entire COMBIONIC Group, mitigating those risks and thereby seeking to prevent, detect and report suspicions of money laundering.

Compliance thought without boundaries
combionic

Combionic GmbH | Bundesallee 28 | 10717 Berlin
 Niederlassung Bayern | Rindewöhrlstraße 15 B | 93055 Regensburg

Keyword search, extended with semantic and recommendation services deliver the relevant and needed information in context of the current user situation

The screenshot displays the Adaptive Content View interface for a policy document. The main content area shows the title "Anti Money Laundering Policy" and the combionic logo with the tagline "WE MAKE DOCUMENTS INTELLIGENT".

Content Area:

- Why do we have this policy?**: COMBIONIC is committed to assisting in the fight against money laundering, including corruption and terrorist financing, by operating an effective, risk based approach. In doing so, COMBIONIC's aim is to manage legal, compliance, regulatory and reputation risks actively, within and across the entire COMBIONIC Group, mitigating those risks and thereby seeking to prevent, detect and report suspicions of money laundering.
- Key Requirements**: Each Business Division must establish and maintain an effective AML Programme in order to avoid, as far as reasonably practicable, unwanted business relationships and transactions. Client relationships and customer transactions may only be permitted after appropriate due diligence has been satisfactorily completed which must include "Know Your Customer" information, identification and screening. Other
- Who does this policy apply to?**: A table showing application details for Location, Legal Entity, Business Division, Business Area, and Roles.

Related To: A list of related policies including "Anti Money Laundering Policy", "1-P-00072 (Group AML Policy - Dealing with Banks and Regulated Entities)", "1-P-00259 (Group AML Policy for Dealing with Banks and Regulated Entities)", "1-S-00217 (Internet Gambling Business)", "1-S-00220 (COMBIONIC Higher Risk Name Data Protection and its Application or KYC/CRL purposes - Operating Principles and Standards)", and "1-A-001418 (Guidelines on Politically Exposed Persons)".

Based on: A list including "1-P-00413 (AML Risk Assessment)".

Glossary: An empty glossary section.

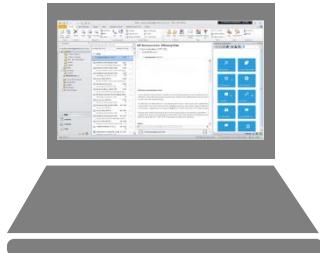
Tools: An empty tools section.

Buttons and Links:

- Bottom left: "Similar Cont" and "Ask".
- Bottom right: "Open adaptive", "Ask", "Download".
- Bottom center: "Download" and "Add to my Fav".
- Bottom status bar: "All folders are up to date.", "Connected to Microsoft Exchange", "100%", and a "Finished" button.

Demo-Workshop

- Detailed presentation of all functionalities
- Expand group of participations (Compliance/legal/business units/IT)
- Identify and discuss customer requirements as basis for an implementation project



FOR FURTHER QUESTIONS PLEASE CONTACT

combionic**Manuela Herrlein**

Marketing/Sales

Combionic GmbH T +49 (0) 30 8321 7950
Bundesallee 28 F +49 (0) 30 6807 7742
10717 Berlin M +49 (0) 178 4488 458
Germany

m.herrlein@combionic.com

1

REDACTION**CONFIDENTIALITY OF DATA AND INFORMATION**

Automatic redaction of sensitive information

2

COMPLIANCE**POLICY MANAGEMENT**

Compliance information incorporated into daily work

4

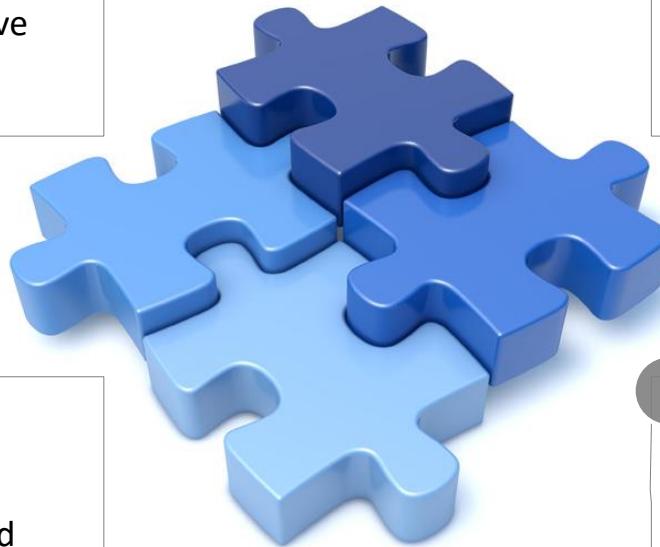
ELEVANT**KNOWLEDGE MANAGEMENT**

Semantic search, clustering and knowledge repository

3

PRESENTATION & CONTRACT**EASY CREATION & SIMULTANEOUS WORKING**

INTELLIGENT COLLABORATION ON PRESENTATION AND CONTRACTS



REPORTINGSERVICES

http://ccldb02.combioniccloud.com/Reports/report/Contracts%20Management%20Overview

Contracts Management O... ×

Combionic SmartWorking Report Center

Stamm > Contracts Management Overview

Contract Signings by Year/Month

Contracts Count

Month	Year	Contracts Count
5	2015	0
6	2015	60
7	2015	60
8	2015	60
9	2015	60
10	2015	60
11	2015	60
12	2015	60
1	2016	137
2	2016	115
3	2016	115
4	2016	0
5	2016	0

Contract Amounts by Year/Month

Total Amount

Month	Year	Total Amount
5	2015	0
6	2015	20,000,000
7	2015	25,000,000
8	2015	25,000,000
9	2015	25,000,000
10	2015	25,000,000
11	2015	25,000,000
12	2015	35,000,000
1	2016	60,000,000
2	2016	50,000,000
3	2016	40,000,000
4	2016	20,000,000
5	2016	0

Compliance Risk Profile

Contracts Count

Risk Level	Count
sehr hoch	7
hoch	22
mittel	860
gering	21

Contract Distribution by Deviation from Standard

Deviation Type	Count
geringe	859
keine	11
non-Standard	14
wesentliche	15

Contract Distribution by Type

Contract Type	Count
Beherrschungsvertrag	182
Beteiligungsvertrag	136
Dienstleistungsvertrag	136
Kaufvertrag	183
Lizenzvertrag	136
Mietvertrag	136

Contract Distribution by Status

Contract Status	Count
aktualisiert	407
finalisiert	93
in Bearbeitung	63
noch nicht abgeschlossen	63
noch nicht archiviert	63
noch nicht freigegeben	63
noch nicht geprüft	63
noch nicht in Kraft gesetzt	63

Top 10 Counterparty by Total Amount (Includes Info on Amounts per ComplianceRisk)

Counterparty	gering	mittel	hoch	sehr hoch	Total
Geni	604777.0000	1476280.0000	451630.0000	384336.2100	2917023.2100
Qumu		1245461.2100	259880.0000	601900.0000	2106841.2100
Gotuit Media	253850.0000	1243474.2100			1497324.2100
HubSpot	1234336.2100		1224336.2100		1234336.2100
NeoEdge Networks			1224336.2100		1224336.2100
PhoneTag		1224336.2100			1224336.2100
Jaxtr			1224134.0000		1224134.0000
Revision3		1219880.0000			1219880.0000
PhotoCrack		1219880.0000			1219880.0000
Mogad		1219110.0000			1219110.0000
Total	7108660.9700	345616147.1500	8546355.0000	3636150.4200	364907313.5400

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