

KYC Manual Screening Process

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Objective and Scope

The objective of this operating procedure is to define roles, responsibilities and lead times for SBS, CCT (Customer, Credit and Trade Service Line) CTC (Customs and Trade Control), to provide the service of partners manual screening to the GBUs.

Partners manual screening is done for:

- Projected partners, wherever located before prospection, bid, sale, order approval, issuance of any purchase order or signature of any agreement;
- Business transactions where there is no link to any trade control IT tool (the distribution site Med-Lab ERP SAGE, R&I Solvay centres).

The group policy is turned towards the best level of compliance and the solution to ensure that the GBU shipments are authorized is to manually screen the recipients against restricted party lists and economic sanctions.

Effective date

October 1, 2018

Reviewed date

August 20, 2020

1. Context

Solvay currently exports U.S., European and other Foreign produced materials from numerous Solvay locations globally. To prevent the sale or purchase of goods or services from or to a restricted party, it is Solvay's policy to screen business partners (for exports, re-exports, domestic transactions) against the various Governments published restricted party, sanctioned countries and products licensing requirements.

2. Screening frequency

SBS, CCT, CTC will provide screening assessment on demand within 48 hours.

The agreed screening frequency between Med-Lab and SBS and Solvay R&I centres and SBS is for new customers when an account is opened within 24 hours and for all other customers at least once every 12 months.

3. Operation sequence

Scope



Worldwide

Dow Jones

ERP

References

Attachments

1. [Group Trade Compliance Program - Know Your Customer : Restricted Party Screening \(Page 28\)](#)
2. [End Use Policy Med-Lab](#)

The GBU sends the new account details at SBS CTC generic email address: trade.control@solway.com

Mandatory fields for an efficient screening:

1. full name of the recipient;
2. the country of destination;
3. the End Use Statement (if required) (see [Appendix 32](#)).

The GBU will have to check in advance whether the destination country is listed as a "country at risk", see [Appendix 07](#) of the Group Export Compliance Program (GECIP). Any shipment to a country at risk will require a Compliance Statement, see [Appendix 11](#) of the GECIP.

CTC Customs specialists perform screening of the account through Dow Jones' "Risk and Compliance" and "Factiva" solutions, which contains two main parts as follow:

- Sanctions Lists : more than 800 sanctions lists (UN, US and EU consolidated lists, Interpol, FBI, etc.) including ownership research and links to Politically Exposed Persons and Special Interest Persons.
- Adverse Media : more than 1 billion reliable news stories articles including 35 years of archives (over 42% is not freely available on the web) on corruption, financial crime, competition, human rights, and much more.

SBS, CCT, CTC answers back to the requestor's email and provides the approved/denied result.

The analysis includes:

- the partner screening report from Dow Jones with analysis in case of sanctioned partners;
- the Dow Jones [credentials](#) to access the adverse media news if any;
- the verification and approval/denial of the End Use Statement.

CTC Customs specialists perform batch screening of existing customers on Dow Jones Risk and Compliance at least every 12 months for both Med-Lab and Solway R&I centers.

Any issues related to trade control has to be reported to the GBU Empowered Official.

For urgent request, outside of Portugal time zone (GMT+1) and which cannot wait a response time of 12 hours, GBU should contact CTC backup contacts as follows:

ZONES	SBS MEMBER	EMAIL	TELEPHONE
AMERICAS	Janice Sarmiento	janice.sarmiento@solway.com	001 (609) 6199 814
APAC	Cindy Xiong	cindy.xiong@solway.com	00862 123 502 299
	Teresa Liang	teresa.liang@solway.com	00862 123 502 123

CTC Process Expert audits the process once per year.

4. Roles and responsibilities

Actor	Role	Responsibility
GBU	Site	verifies the country of destination and request an End Use Statement when required
GBU	Site	sends emails to CTC with new account details for manual screening along with a copy of the End Use Statement if needed
CTC	Custom s speciali sts	daily check of the new accounts to be analyzed
CTC	Custom s speciali sts	analyze new partners in Dow Jones and follow internal procedure in case of perfect match
CTC	Custom s speciali sts	analyze, approve/deny End Use Statements for accounts located in countries at risk

CTC	Processes Expert	provides support for the license determination
CTC	Customs specialists	answer back to the GBU, within 24 hours for Med-Lab and R&I centres or within 48 hours for other requests, after email reception and provide account status (approved or denied)
CTC	Customs specialists	archive the screening analysis with resolution case on Risk and Compliance
CTC	Customs specialists	perform batch screening of existing customer on Dow Jones Risk and Compliance at least every 12 months for both Med-Lab and Solvay R&I centers
GBU	Empowered Official	manages non compliance issues related to the site
CTC	Processes Expert	supports CTC specialists and audits the process once per year

Scope



EMEA

UK

ERP

SAGE

Dow Jones

References

Attachments

ANNEX:

1- End Use Policy

<https://drive.google.com/drive/folders/1JnjuhXhS4CEJcL3EIlcmnk6KGC7RwxkH>