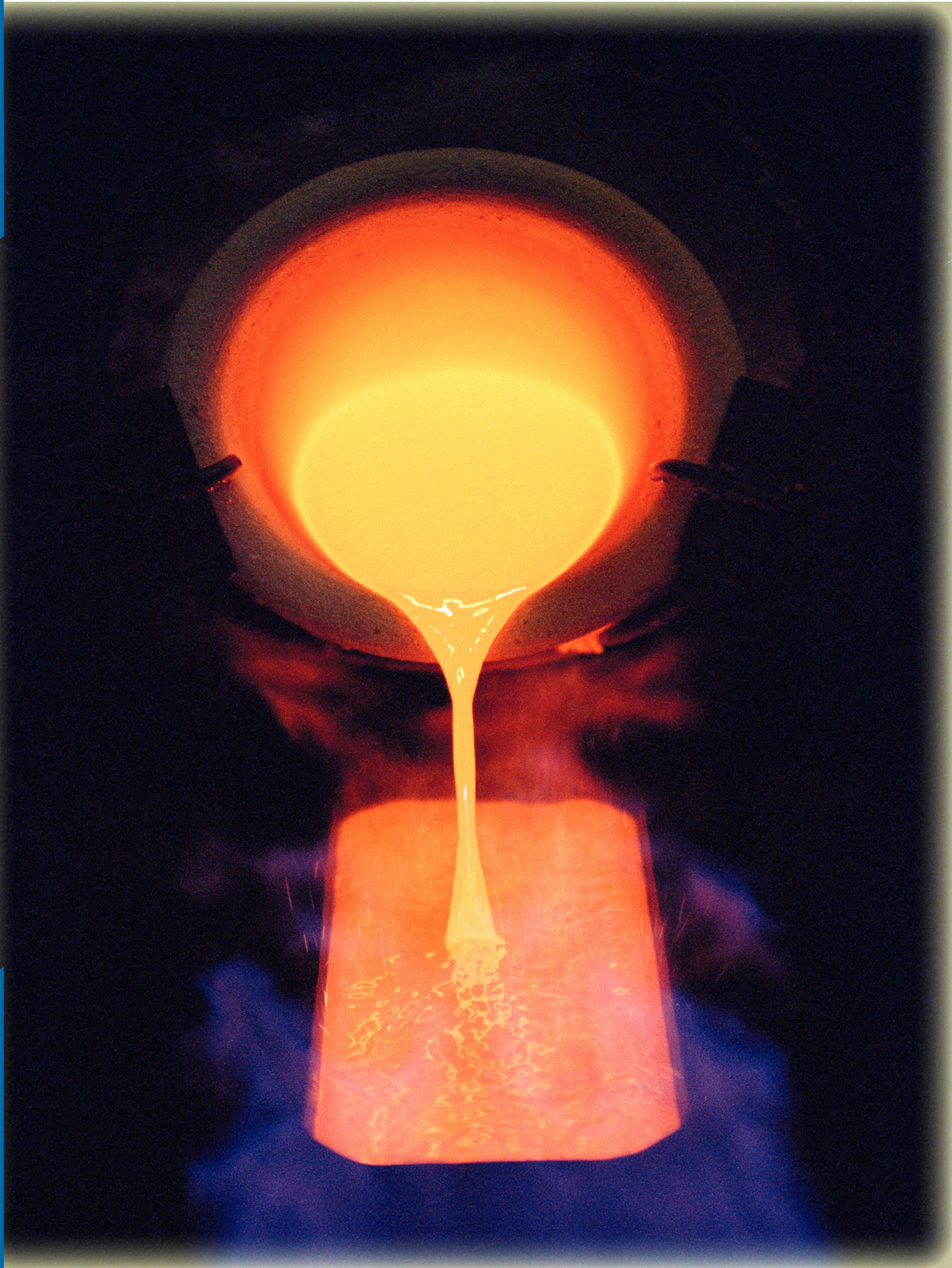


# 319 PLATINUM PLATFORM

*Precious Metal Industry Solutions*

Professional Website • Client Portal • AML / Due Diligence Suite







CONTENTS

|        |                                 |
|--------|---------------------------------|
| 3      | 319 Platinum Platform           |
| 4 - 6  | Professional Website            |
| 7 - 8  | Client Portal                   |
| 9 - 13 | 319Insight AML / KYC Compliance |
| 14     | Pricing                         |

*“The message is that the era of high financial asset returns for both stocks and bonds is over, and precious metals are the primary go-to assets for wealth preservation. QE3 will only serve to accelerate this trend.”*

- Nick Barisheff  
CEO of Bullion Management Group Inc



## 319 NETWORKS

# ► PROFESSIONAL DIGITAL SOLUTIONS FOR THE PRECIOUS METALS INDUSTRY

Global economic conditions have caused explosive growth in precious metals organizations over the past five years. A significant influx of new companies has entered the marketplace at all levels of the precious metals lifecycle to take advantage of the market.

Having a world-class digital platform is essential to capture new customers, retain existing accounts, mitigate corporate risk, and manage growth without adding fixed costs. 319 NetWorks Platinum Platform is the best choice for the precious metals industry.

**A**s a result of global economic conditions, the precious metals market has seen a significant increase in size and scope over the past five years. Increased competition has arisen at every level of precious metals business, including mines, refineries, brokerage & trading houses, scrap recyclers, and product dealers.

Old methods of doing business are quickly being replaced by more efficient processes. With a saturated market and a push to gain competitive advantages, it is essential to invest in the correct infrastructure as a precious metals organization.

### MINING COMPANIES

Due to the price increases in precious metals, new mining companies have developed as the prospect of financial gains have rendered exploratory missions attractive.

Junior mines in the Americas and Australia have been able to achieve success with a steady cost of production relative to the rising market value of precious metals.

As a mining organization, it is important to satisfy the needs of current investors as well as attract new capital. Delivering relevant and timely information is critical to this process.

### PRECIOUS METALS REFINERS

Refiners play a critical role in the precious metals lifecycle. Because they deal with many stakeholders, (suppliers, traders, distributors, etc.) their efficiency in business operations has a profound effect on their bottom line.

Competition for refining customers is at an all-time high. Suppliers are driving metal accountability terms up, forcing cost reduction in other areas. Client loyalty is also a major issue for refiners attempting to differentiate on price alone.

### BULLION AND COIN DEALERS

Dealers have seen a significant demand increase for investment grade precious metal bullion, coins, and ingots over the past five years. If a dealer can convert a casual, one-time buyer into a loyal, repeat purchaser, then they will be very successful.

In order to build these relationships, the dealer must start with excellent pull marketing to attract the customer, provide a convenient transaction process, and then follow through with outstanding personalized customer service.

It is a must for a successful dealer to arm themselves with a world-class digital platform to support their business.



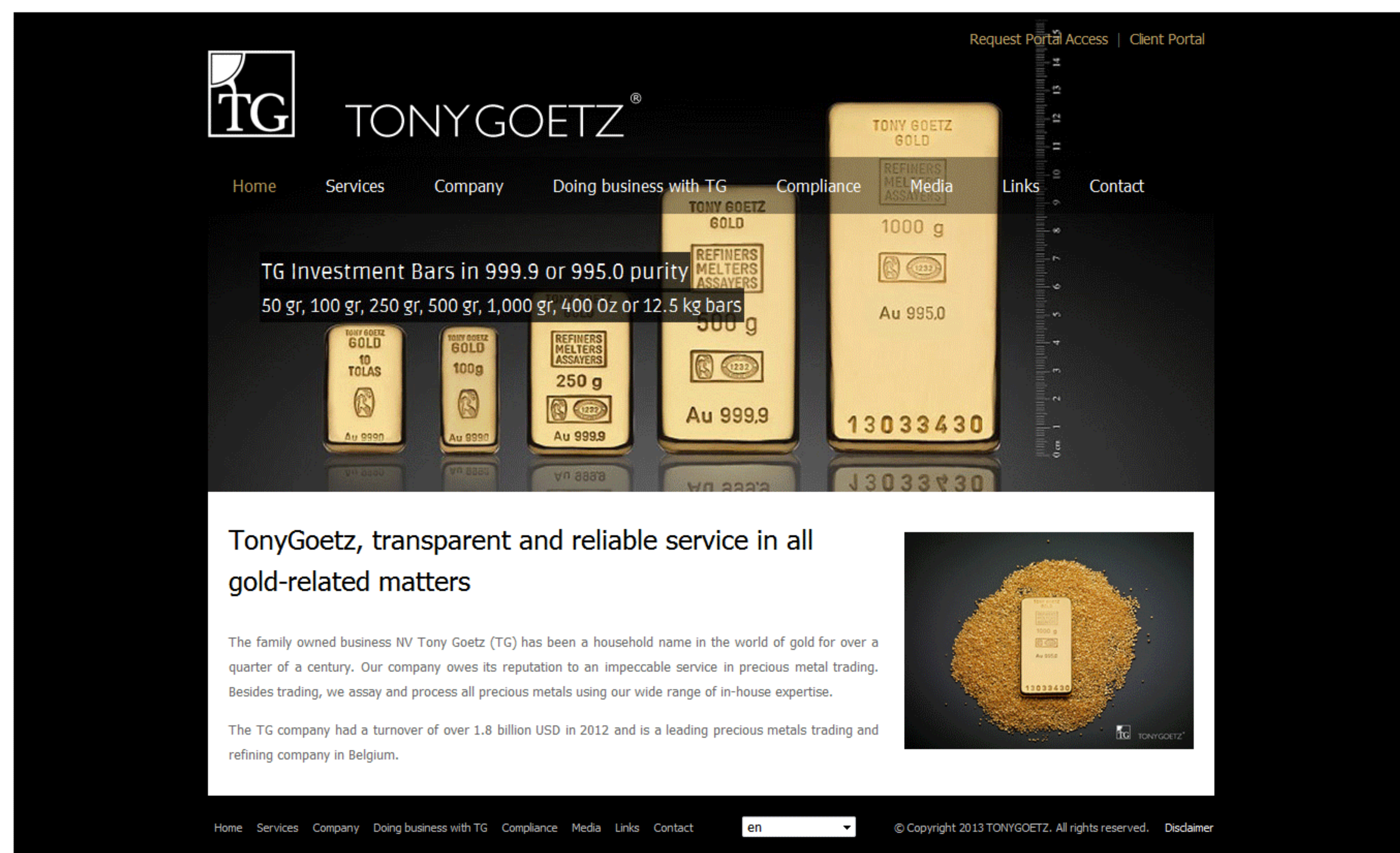
## 319 PLATINUM PLATFORM

The 319 Platinum Platform is comprised of a professional website, a client portal, and 319Insight - a revolutionary anti-money laundering (AML) / know-your-customer (KYC) suite. The 319 Platinum Platform provides precious metals companies with a true business solution that generates sustainable success.

### PROFESSIONAL WEBSITE

Any successful precious metals company must have a modern, attractive, purposeful website. Too many precious metals companies are outdated in diminishing the importance of the website to the business.

The website is typically the first point of impression that a prospect has with the organization. It is essential to not discourage a visitor from proceeding further with the company, and even better, inspire engagement.



With greater than 1,500 websites in its resume, 319 NetWorks possesses expert ability in blending design, navigation, visual cues, and functional layout into intuitive, memorable user experiences on the web.

319 NetWorks expert staff will examine your business from top to bottom to ensure that the website is a true reflection of your greatness. Each design is custom made, reflecting and promoting your brand fully in order to maintain a consistent message and feeling about the organization.

319 NetWorks Platinum Platform also provides allows for mobile versions of your website. With more and more people accessing the web through mobile devices, it is important to have a highly functional, easy to use mobile presentation.

Mobile sites are designed in a way that presents the most important and relevant information to a user in an easily accessible manner. Technologies such as Flash are avoided to ensure compatibility across all devices.

The 319 Platinum Platform contains device recognition technology, determining the device used by the site visitor. The site can be optimized for the PC, Tablet, and Cell Phone for maximum utility.





PROFESSIONAL WEBSITE HIGHLIGHTED FEATURES:

Precious Metals Market Prices

The market price of precious metals is of the utmost importance to stakeholders. Pricing can be displayed anywhere on the site, and can have a custom look & feel. The regular pricing module has the standard delay. Real time price integration can also be achieved as an upgrade. Pricing can tie into other functions as well, including product pricing, calculators, and more, as needed.

| SEPTEMBER 30,2013 AT 17:36 NEW YORK TIME |         |        |         |         |
|--|---------|--------|---------|---------|
|  | PRICE   | CHANGE | LOW     | HIGH    |
| Gold                                     | 1328.90 | -8.30  | 1327.20 | 1330.30 |
| Silver                                   | 21.81   | -0.07  | 21.63   | 21.84   |
| Platinum                                 | 1410.00 | -15.00 | 1399.00 | 1412.00 |
| Palladium                                | 728.00  | -5.00  | 721.00  | 728.00  |
| SPOT PRICE                               |         |        |         |         |
| LONDON GOLD FIX                          |         |        | AM      | PM      |
| USA                                      |         |        | 1335.75 | 1326.50 |
| GBP                                      |         |        | 827.30  | 821.87  |
| EUR                                      |         |        | 989.59  | 980.41  |

Payout Calculator

The payout calculator is a great way to help potential clients gain an understanding of expected returns. The calculator can have a custom look & feel, and can include any type of material. In addition, the calculator comes with a handy conversion tool, to convert weights into a standard. Pricing will automatically populate from the pricing module, but can be overwritten by the customer to estimate expected returns based on speculative prices. The customer also may enter their metal accountability to provide a more accurate representation of potential payout. Formulas to determine pricing can be customized to include any controls desired.

WEIGHT500MASSgramD.W.T.321.5075CONVERT

PRICE OF GOLD(\$):1328.90

| KARAT | WEIGHT IN D.W.T. | ESTIMATED PAYOUT |
|-------|------------------|------------------|
| 8k    | 0                | \$ 0.0000        |
| 10k   | 0                | \$ 0.0000        |
| 14k   | 321.5075         | \$ 11963.0369    |
| 16k   | 0                | \$ 0.0000        |
| 18k   | 0                | \$ 0.0000        |
| 21.6k | 0                | \$ 0.0000        |
| 24k   | 0                | \$ 0.0000        |

Enter Terms (Metal Accountability) % :95

CALCULATETOTAL:\$ 11364.89

Custom Forms

Forms are an important piece to any good website. Many business processes are based on someone filling out a form and submitting it or sending it for approval. But even this simple task can be riddled with errors, inefficiencies and wasted money, which is why organizations all over the world are making the move to electronic forms. Our Form System can help you better streamline your workflow, increase productivity and reduce costs. Forms can be used for a variety of reasons, including contacting the business, customer support, notifications, account maintenance, and more.

Section 1 - Business Information

Company Name\*:Web site:

First name\*:Last name\*:

Address 1\*:Address 2:

City\*:State:

Zip:Country / Nation:

Email\*:Telephone:

The design, look, and feel to the forms can be customized to match your brand or anything that is desired. The system allows users of any skill level to create, store, route, and deploy Forms without assistance from the IT department. Custom fields are easy to create and use, allowing further system flexibility. Data submitted in forms can be delivered to one to many individuals via e-mail, SMS (text) notification, and/or dashboard alerts. These notifications can be routed to the appropriate recipient(s) based on your organization’s unique business rules and how the form fields are completed. Multi-languages are also supported.

Naam onderneming\*:

Klantennummer:

Voornaam\*:

Familienaam\*:

E-Mail\*:

Telefoon:

Verstuur



PROFESSIONAL WEBSITE HIGHLIGHTED FEATURES:

News & Press Engine

The news engine is a powerful and easy to use system to post news stories, announcements, and more. The news system is structured so that news can be posted to all areas that are running news. For example, you may want to have a “news block” running on the home page that shows headlines and a brief with a link to the full story. News can be categorized into unlimited groups, such as Corporate News, Market News, Investor News, etc. You may even create news items that are to be released at a future date.

Image Galleries

319 Platinum Platform has multiple methods to display rich image galleries. Products displayed in a gallery setting project a sharper, clearer image and present a more life-like feel. Galleries are also a great method to present project images, demonstrating the success of the firm within the context of a project. Galleries can appear in a pop-up mode or within the framework of a page, with album covers and image navigation.

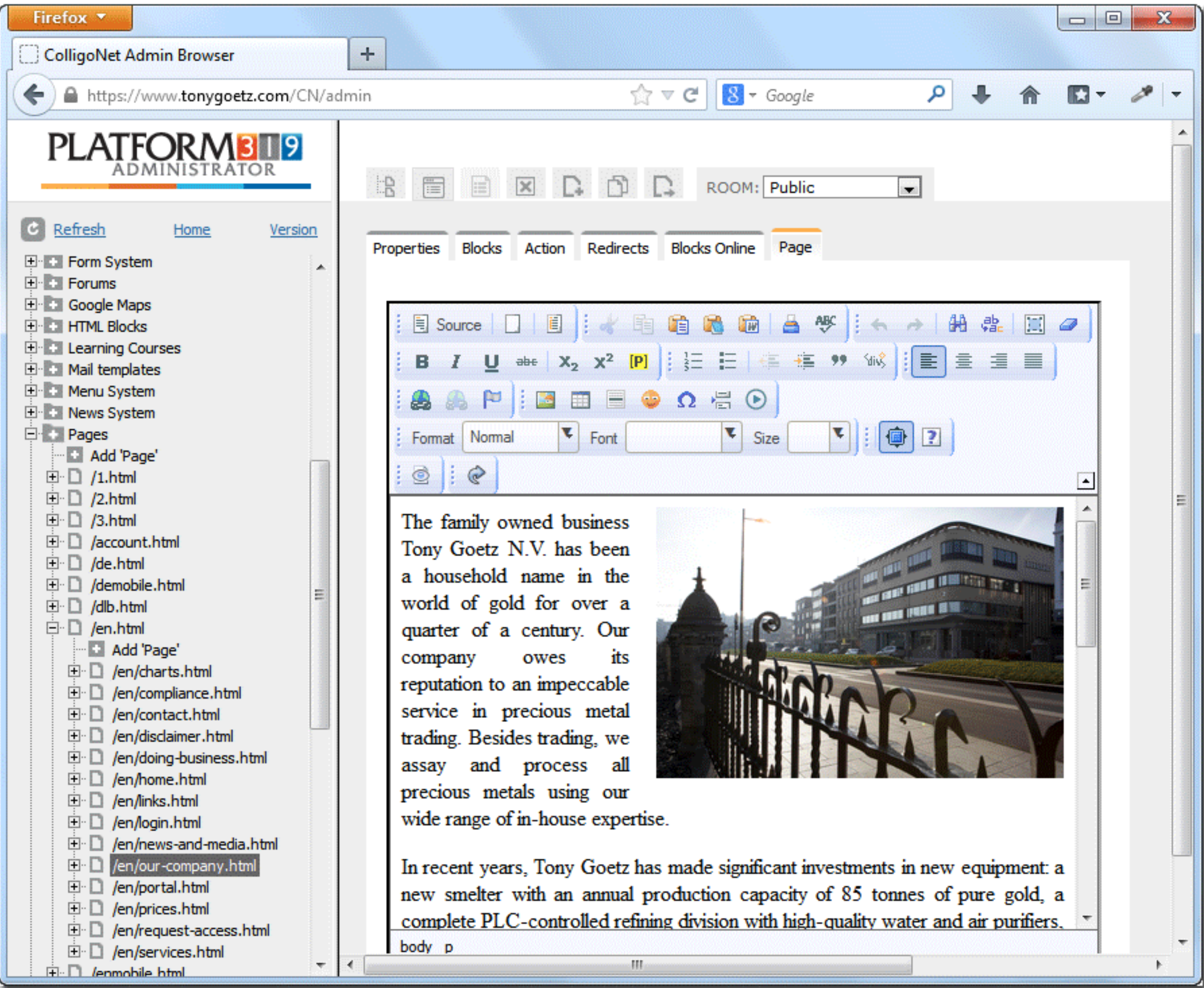
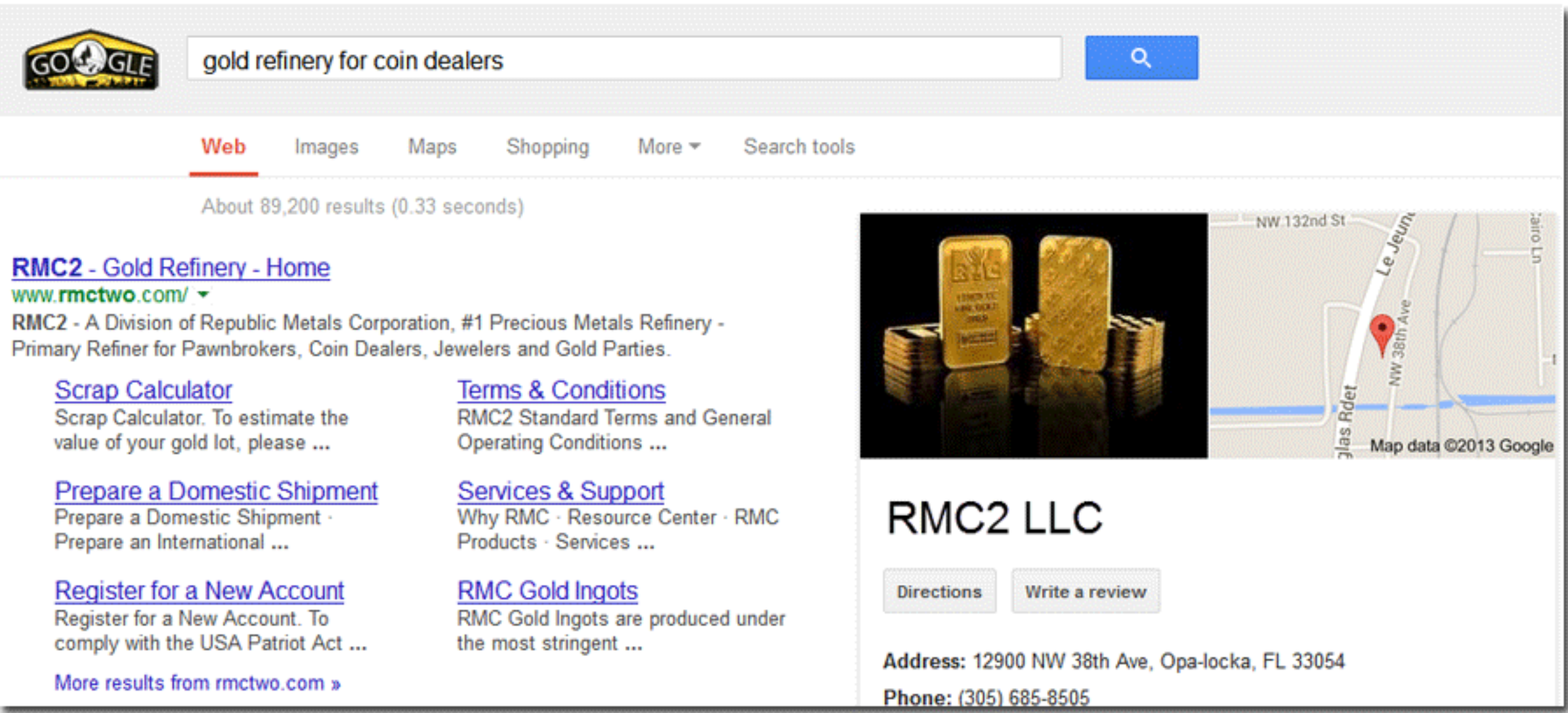
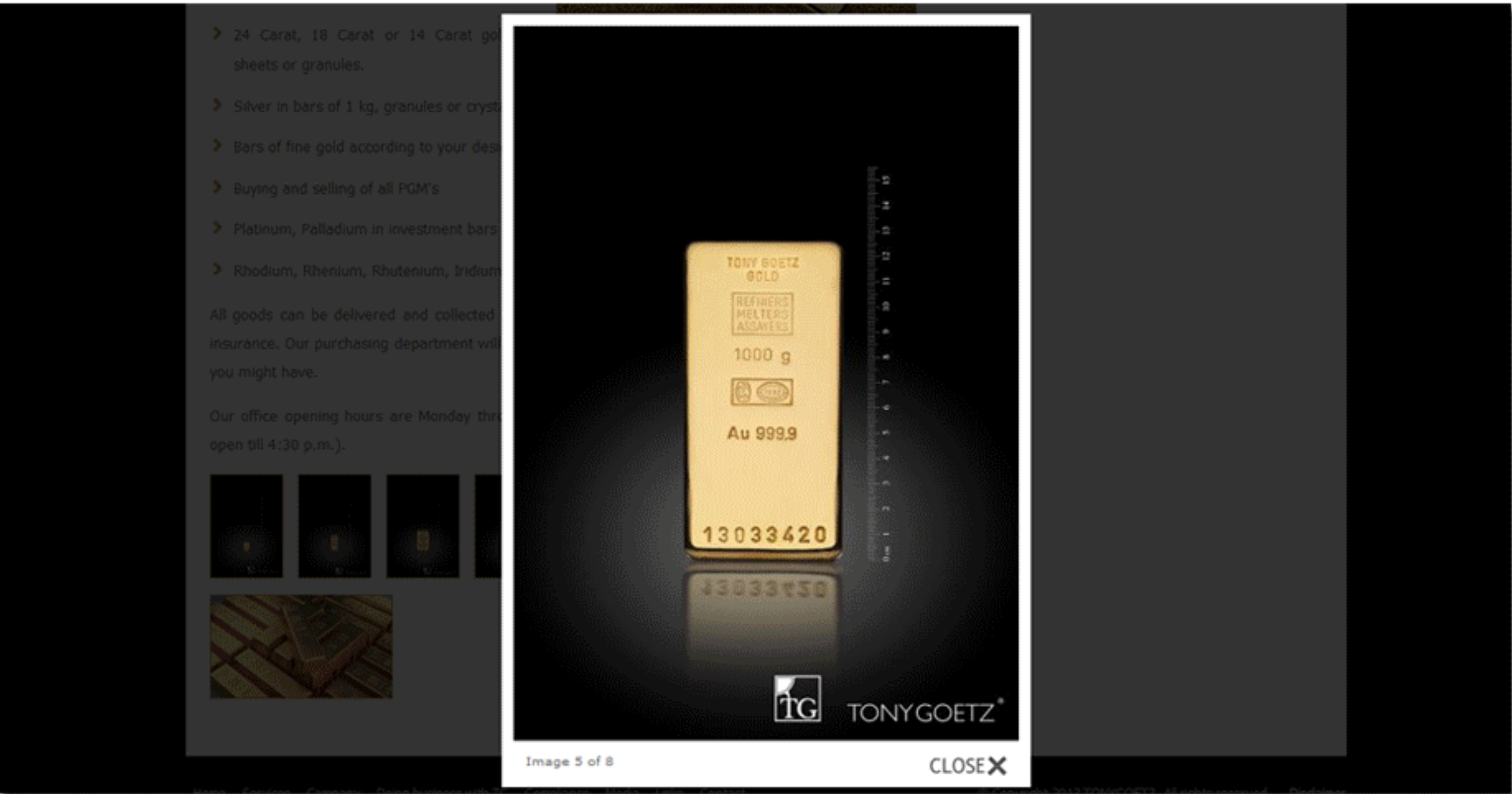
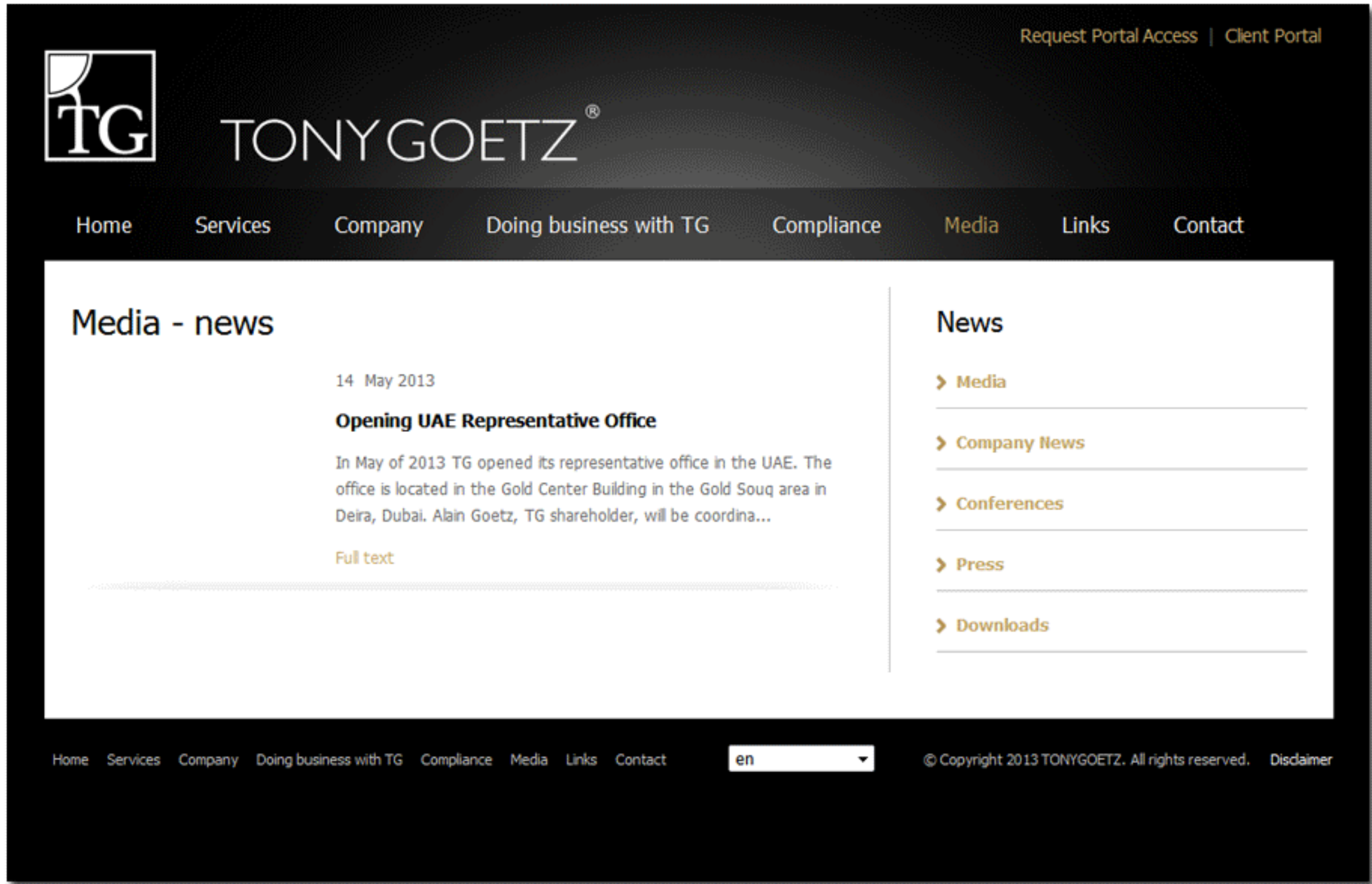
SEO Excellence

319 Platinum Platform contains the tools required to conduct flexible and ongoing SEO campaigns. With controls on Site Properties, Page & Browser Titles, Meta Data, Tags, and more, administrators can continually tweak keywords and properties in order to optimize their search campaign efforts.

Unparalleled Content & Function Management

Content Management is no longer a luxury for professional websites - it is a must have in today's fast paced and ever evolving business world. 319 Platinum Platform websites are powered by the Administrator system, offering the tools your business needs to keep content fresh, meaningful, and personalized - seducing prospects and keeping customers coming back.

Within the platform, site administrators can reconfigure, manage and set properties on endless web functions. This feature is extremely unique, very powerful, and gives the enterprise unrivaled control over its web assets. As a result, companies can modify website functions as needs evolve to best service the goals of the organization.





319 PLATINUM PLATFORM

The 319 Platinum Platform is comprised of a professional website, a client portal, and 319Insight - a revolutionary anti-money laundering (AML) / know-your-customer (KYC) suite. The 319 Platinum Platform provides precious metals companies with a true business solution that generates sustainable success.

CLIENT PORTAL

In order to differentiate your precious metals organization from the competition, it is crucial to offer world-class customer service. The timeliness of transactions and market changes require immediate responses from support agents. The 319 Platinum Platform client portal provides a powerful and focused set of customer service and support features.

In addition to outstanding customer support, the client portal offers self service ability to prepare shipments, connects to back-office systems to retrieve financial reports, and empowers account maintenance / profile management.

Lot Sheet

Tuesday October 1st, 2013

USER NAME: Chief System Administrator | Logout

Click here to change your password

Home > Portal > Lot Sheet

Lot Number\*

SUBMIT

| DATE OF DOCUMENT       | DOCUMENT           | STATUS    |          |        |
|------------------------|--------------------|-----------|----------|--------|
| 08/21/2013 03:16:18 PM | Lot Number L044756 | Completed | Download | Remove |
| 08/20/2013 03:48:48 AM | Lot Number L044756 | Completed | Download | Remove |
| 08/19/2013 05:28:28 AM | Lot Number L043916 | Completed | Download | Remove |

ABOUT USOPERATIONSGOVERNANCEINVESTORSMARKETSRESPONSIBILITY

HomeContact UsEmploymentGlossary

Monday November 19th, 2012

User Name: Chief System Administrator | Logout

CUSTOMER PORTAL

PREPARE SHIPMENTPROCESSED SHIPMENTSHELP

Shipment Information

| SHIPMENT ID: | SHIP DATE: | ORIGIN:     | DATE INITIATED: |        |
|--------------|------------|-------------|-----------------|--------|
| 1232         | 11/10/2012 | Facility BC | 11/09/2012      | Remove |
| 1233         | 11/12/2012 | Facility BC | 11/10/2012      | Remove |
| 1234         | 11/13/2012 | Facility BC | 11/11/2012      | Remove |

ADD NEW

Shipment Information

| SHIPMENT ID: | SHIP DATE: | EST. RECEIVE DATE: | ORIGIN:     | WEIGHT UOM: |
|--------------|------------|--------------------|-------------|-------------|
| 1235         | 12/01/2012 | 12/05/2012         | Facility BC | oz t        |

Witness Sample/Weighting?

Assay Exchange?

Final Samples?

Comments

Comments

LOT INFORMATION:

| Lot ID:                   | Containers: | Total Weight: | Material Type: |                  |
|---------------------------|-------------|---------------|----------------|------------------|
| 1234567891123456789212345 | 2           | 2000 oz t     | Sweeps         | Remove Expand    |
| 1234567891123456789212346 | 2           | 2000 oz t     | Sweeps         | Add Lot Collapse |
| 1234567891123456789212346 |             |               |                |                  |

CONTAINER DETAILS:

| Container ID: | Gross Weight: | Tare Weight: | Net Weight: |               |
|---------------|---------------|--------------|-------------|---------------|
| 2             | 1005          | oz t 5       | oz t 1000   | Add Container |

ASSAY DETAILS:

| Material Type: | Sweeps      | Assay Unit:     | % Contained |              |
|----------------|-------------|-----------------|-------------|--------------|
| Metal:         | Est. Assay: | Est. Fine Yield |             |              |
| Pd   Palladium | 1.0000      | 10 oz t         |             | Remove Metal |
| Pt   Platinum  | 1.0000      | 10 oz t         |             | Add Metal    |

TOTALS:

Containers: 4

Total Weight: 4000 oz t

SAVE SHIPMENTSAVE & PROCESS

SiteMapLegalPalladium Alliance InternationalGlossaryEmploymentContact UsHome

© 2013 Stillwater Mining Company

CONNECT TO MY ACCOUNT MANAGER

CHATEMAILPROFILE

REPORTS

Settlement Report

Closed Lot Sheet

Open Lot Sheet

Payment(s) List

Purchased Open Fixes

Purchased Open Fixes Excel

Sales Open Fixes

Vendor Detail Trial Balance

Pool Statement – All Metals

Reports

Tuesday October 1st, 2013

User Name: Chief System Administrator | Logout

Click here to change your password

Home > Precious Metals Refinery > Welcome to the Portal > Reports

Settlement Report

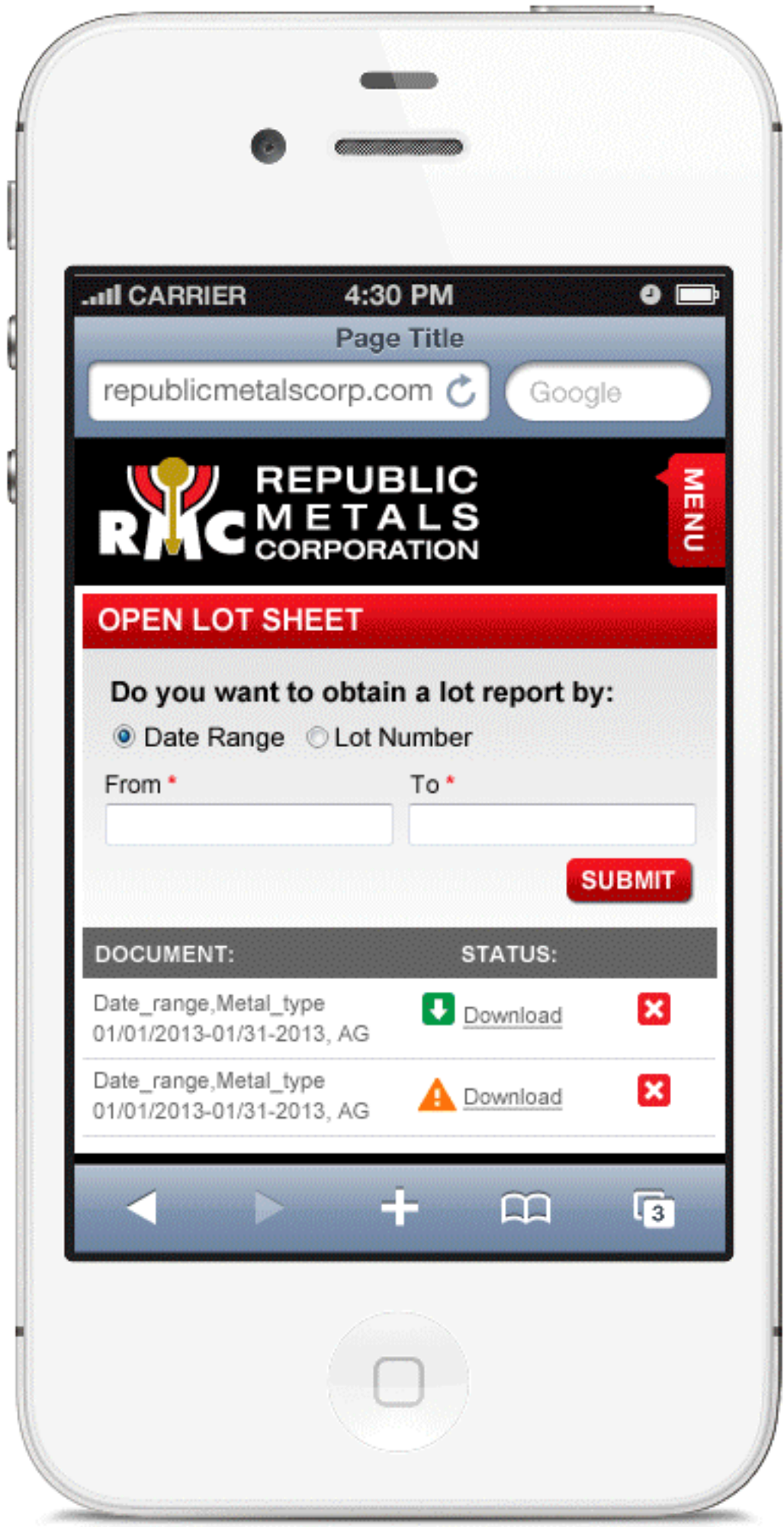
See Metal Summary with respective Pricing, Processing Charges, Advances & Payments.

Closed Lot Sheet

See before & after melt weights, assay, accountability and payable ounces.

Open Lot Sheet

See open lot information such as before & after melt weight. No assay information available. After melt weight subject to change.



*It's a fact:* In the past three years there's been a 12 percent rise in the use of web self-service, a 24 percent increase in chat, and a 25 percent increase in community usage for customer service. Your clients are demanding self-service reach into the business. 67 percent of people prefer self-service over speaking to a company representative. So, what can a client portal do for your business?

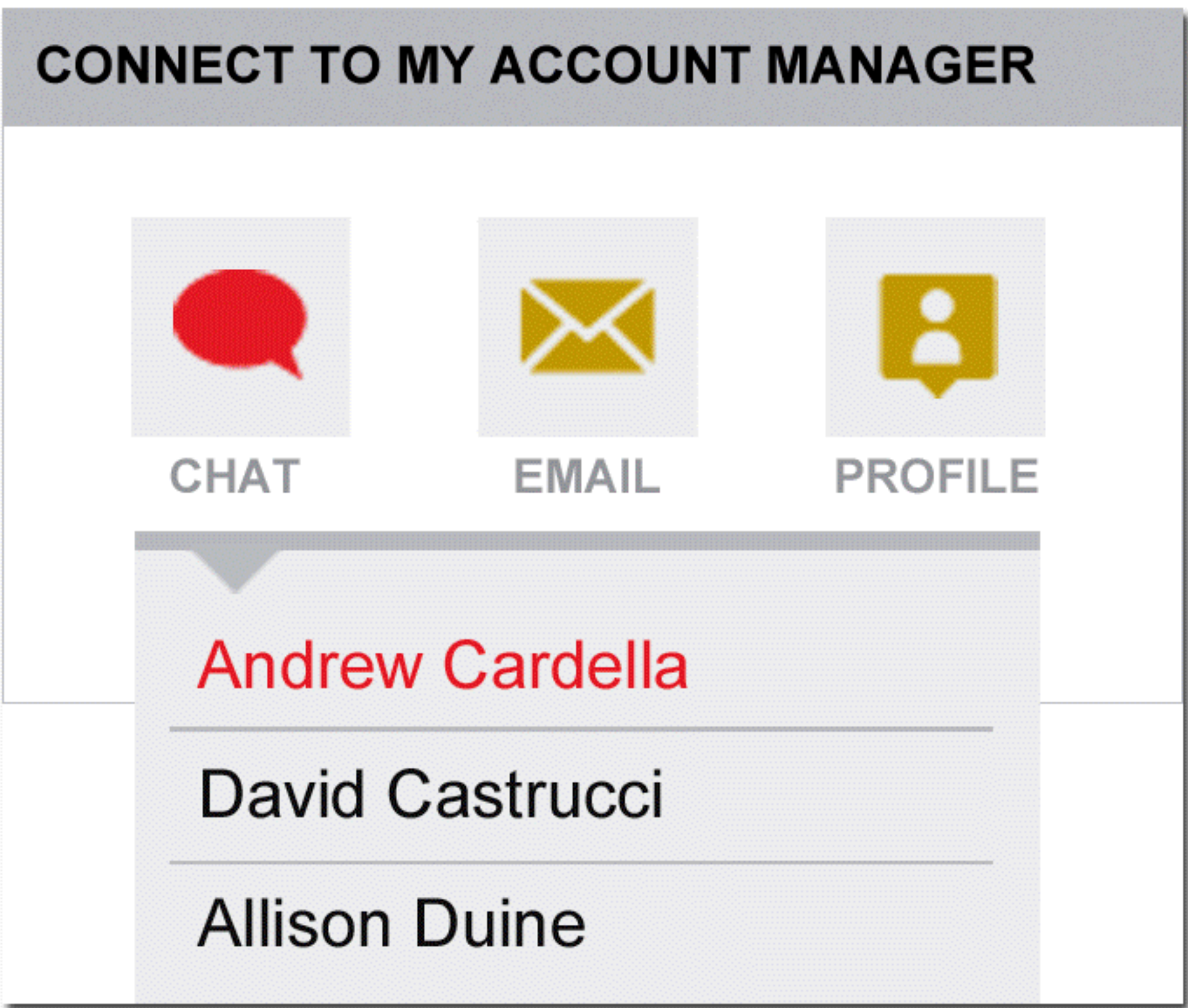
- 1. Empowers your customers & vendors to actively and efficiently engage the business on *their terms*
- 2. Brings a faster cycle time from issue to resolution
- 3. Reduces administrative burden and support costs while enabling the business to expand
- 4. Minimizes errors in data entry, collection, and communication
- 5. Increases business intelligence in both depth and scope
- 6. Expands cross-selling and promotional opportunities
- 7. Securely extends the reach of internal systems beyond the firewall



CLIENT PORTAL HIGHLIGHTED FEATURES:

Connect to Account Manager

319 Platinum Platform allows direct connection between a client and their account manager. The system can recognize who the logged in user is and match that person with their account manager. This allows direct communication among the parties, through chat, e-mail, and / or portal message. The client can also view their account manager’s profile, creating a stronger bond between the parties. The relationships between client and account manager can be set by the portal administrator in the Workstation system, or can feed in through a back office system, if required.



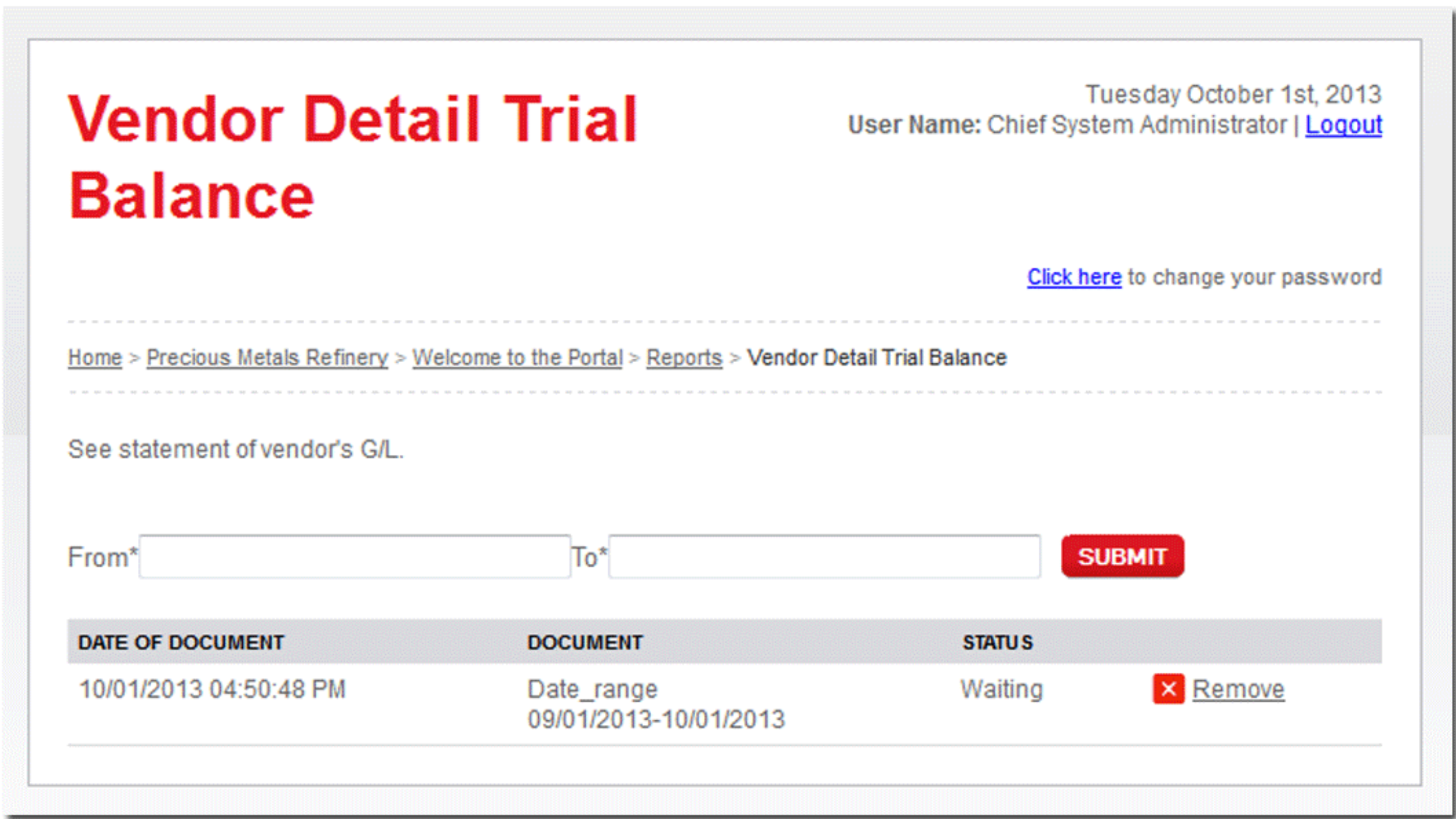
Self-Service Shipping Manager

The self-service shipping manager is a very powerful function that allows clients to prepare shipments into your precious metals organization directly. The platform contains full integration to FedEx’s web services, enabling shipment creation and the printing of shipping labels and associated documents. In addition, the platform can integrate into ERP systems, such as Microsoft’s Dynamics NAV Refining module to create a complete closed loop process.



Inventory & Financial Reporting

319 Platinum Platform can integrate to the financial, accounting, and inventory systems of the enterprise, enabling clients to request on-demand reports. Example reports include Lot Reports, Settlement Reports, Transaction Logs, Pool Balances, Margin Statements, and much more. The system keeps a record of all requested reports and maintains linkage to retrieve them until the user removes them. This system relieves significant burden on the customer service department in the creation and delivery of such reports, and enables the client to gain a transparent view of their dealings with the organization.



Profile Management

Client portal users have the ability to maintain a profile, where they may keep attributes such as their name, address, phone number, e-mail, password, etc. current at all times. If chosen, these attributes can dynamically update and populate in your backoffice system (in most cases). This reduces administrative burden on your company and places control directly in the hands of the customer, satisfying their demands.





## 319 NETWORKS

# ▶ AML COMPLIANCE SOLUTION FOR DEALERS OF PRECIOUS METALS AND GEMS

THE USA PATRIOT ACT, WHICH AMENDS THE BANK SECRECY ACT (BSA), WAS ADOPTED TO STRENGTHEN U.S. MEASURES TO PREVENT, DETECT, AND PROSECUTE INTERNATIONAL MONEY LAUNDERING AND THE FINANCING OF TERRORISM.

THESE EFFORTS INCLUDE ANTI-MONEY LAUNDERING (AML) REGULATIONS THAT IMPACT THE BANKING, FINANCIAL, AND INVESTMENT COMMUNITIES, REQUIRING THE ESTABLISHMENT OF FOCUSED AML PROGRAMS.

**A**s a result of the Patriot Act, persons who are or are required to be registered as futures commission merchants (FCMs), introducing brokers (IBs), commodity pool operators (CPOs), and commodity trading advisors (CTAs) have become subject to requirements for establishing AML programs, reporting suspicious activity, verifying the identity of customers, and applying enhanced due diligence to certain types of accounts involving foreign persons.

An AML Program must be in writing and *must include*:

- the development of internal policies, procedures, and controls;
- the designation of a compliance officer;
- an ongoing employee training program; and
- an independent audit function to test programs.

### SEVERE PENALTIES FOR NON-COMPLIANCE

Organizations that choose to ignore AML regulations have suffered severe consequences. Millions of dollars in fines and asset seizures have resulted from bad business, both deliberate and unintentional.

To make matters worse, resulting negative press can irreparably damage a company's reputation within the industry even if there was no malicious intent.

### BUSINESS ADVANTAGES WITH COMPLIANCE

Dealers in precious metals & gems that make a concerted effort to establish a thorough AML Compliance program will benefit their business in ways they may not have considered.

The timeliness of capital flow is essential to maintaining suitable operating conditions as a precious metals dealer. It is a necessity to have advantageous line-of-credit and lending programs to compete. In order to establish ethical banking and refining relationships, dealers in precious metals must demonstrate full cooperation with AML & KYC guidelines.

Further, at any level of precious metals dealing, it is essential to be able to count on your suppliers and your buyers of precious metals.

At a level below a refinery, it is crucial to maintain excellent refining relationships in order to liquidate your material. As a refiner, it is crucial to have excellent distribution to sell through your work product. Ensuring the success of your channel builds a sustainable business.

Finally, by assuring limited risk with authorities, businesses can establish important communication lines with agencies to forge unbreakable bonds and strengthen their position within the industry.





## PROCESS AUTOMATION

Digital processes of data collection and verification offer:

- faster start to end lifecycle
- a more efficient use of time
- reduction of data entry and validation errors
- assurance that all data required is actually collected
- quick, easy and inexpensive data storage & retrieval
- on-going monitoring and checks
- insights to data trends across multiple data sets
- intelligence and analysis for decision making
- streamlined global operations for multi-language work

## 319INSIGHT - THE SOLUTION

319Insight is a revolutionary solution solving complex AML requirements and is far superior to the current systems that capture information on a web form. 319Insight empowers all stakeholders and holds all parties (including the customer) responsible for achieving compliant status.

The system is comprised of a secure web portal, one-to-many questionnaires, a compliance officer workstation, and the portal administrator. Third party background screening systems can be integrated for rapid, continual risk analysis and monitoring.

319Insight is a comprehensive, fully customizable, reconfigurable compliance solution. It offers a unique “flexible structured environment,” allowing modification to the system on an on-going basis, empowering the enterprise to adapt to any compliance needs required.

## CLIENT PORTAL INTEGRATION

The 319Insight system includes an integrated customer portal. The portal is a secure gateway containing one to many questionnaires, compliance resource libraries, and communication tools. The portal is fully reconfigurable, customizable, and scalable. Importantly, the portal can be designed to match the organization’s brand, creating a seamless user experience. Portal users can be segmented, allowing rule-based sets of content and functionality to be delivered to the appropriate recipients.

## THE AML / KYC QUESTIONNAIRES

319Insight questionnaires possess revolutionary digital data processing technology. Data can be collected within expandable sets of fields. Fields can dynamically expand based on user properties, answers to questions, and/or any business rules required. The questionnaires feature a powerful workflow system, invoking visibility, permissions, notifications and contribution requirements of one to many parties. Workflow can be fully customized to match any needs, and can be reset by administrators at any time.

## COMPLIANCE OFFICER WORKSTATION

Workstation is the 319Insight command center, empowering the compliance team with a secure toolkit of controls, reports, communication systems and risk analysis tools to operate a best-in-class compliance department. Workstation features a customizable compliance dashboard, alerts and notifications, an “at-a-glance” file view, powerful communication tools, risk analysis, and the ability to generate compliance reports with the click of the mouse.

## PLATFORM319 ADMINISTRATOR

The administrative system provides a secure environment to configure, manage and control every aspect of 319Insight, including the portal, questionnaires, and workstation. The system offers user segmentation to enable organizations to designate unique portal administrators, questionnaire administrators, and more.



THE AML / KYC QUESTIONNAIRES

The questionnaires can be customized to include any scenario required. A revolutionary workflow system invokes questionnaire assignments, visibility, permissions, and communications. Highlighted features include:

Multiple Field Types

With an array of field types, data collection can be configured in a flexible, yet structured environment. Data entry becomes faster and easier for the user with optimized formatting of field types, and reduces data entry errors significantly. Examples include:

- Text / Text area / Note
- Drop list / Multi select
- Checkbox
- Date / Date with options
- Number / Formula
- Password
- Signature
- File upload

Helper Fields

Helper fields are sets of fields that offer data suggestions based on earlier entries. These helper fields can be configured as one to many fields of data, and grouped accordingly. Benefits include faster data entry and consistent data across the entirety of the questionnaires.

Signature Fields

Signature fields enable a user to input a digital signature directly in the body of the questionnaire. Using a mouse (or a finger if using a touch screen device), a user can sign within the field to create a unique identifying trait and adding a layer of validation.

Add Another

Add another functionality is extremely powerful and useful in the questionnaires. A question, branch of questions, and/or section can have add another set upon it. When a user is entering information, they may click “Add Another” to invoke another set of the same questions. There are no restrictions on add another, in that a user can add an unlimited number of times. There are also controls to remove an add another case in the event it was inadvertently added.

COMPLIANCE PRACTICES

Does maintain codes, policies, procedures, guidelines, handbooks, training material, and/or other written documents that relate to **Compliance Matters**?

Yes

Please provide copies of any such codes, policies, procedures, guidelines, handbooks, training material, and/or other written documents and describe how these are distributed and whether employee certifications are required. If employee certifications are required, include a copy of the form(s) of certification.

Upload Compliance File:

Browse

No file selected.

Add Another File

Describe the use of the document(s):

Please describe the 's policy on providing gifts, meals, entertainment or anything of value to customers or potential customers.

Does provide any training to employees on **Compliance Matters**?

Select

ACCOUNT CONTACTS

Please provide contact information for each individual associated with a refining account at

First Name

Andrew

Robert Michael James President

Andrew Joseph Cardella Vice President

Middle Name

Joseph

Title

Vice President

Cardella

Name of Certifying Official

Andrew Joseph Cardella

Title of Certifying Official

Compliance Director

Signature of Certifying Official

Andrew J. Cardella

I can't sign digitally

Reset

Date

09/27/2013

SPECIALLY DESIGNATED NATIONALS

10. Does any individual and/or entity identified on the list of "Specially Designated Nationals," available via the website listed below, own or control any interest in the Proposed Intermediary?

OFFICE OF FOREIGN ASSETS CONTROL - Specially Designated Nationals and Blocked Persons List

Yes

Full Legal Name of Individual or Entity

George William O'Neal

Percentage of Ownership and/or Control

37

Full Legal Name of Individual or Entity

Acme Manufacturing

Percentage of Ownership and/or Control

12

Add Another Individual / Entity



THE AML / KYC QUESTIONNAIRES

The questionnaires can be customized to include any scenario required. A revolutionary workflow system invokes questionnaire assignments, visibility, permissions, and communications. Highlighted features include:

Authentication

Running authentication on a questionnaire ensures all required data is actually completed and validated across all pages, sections, branches, and questions. A user can run authentication at any time during the process by toggling to the review page. The review page shows a snapshot of the status of each page within the questionnaire. If a page is noted as incomplete, a user can click that page and be driven to the missing information. Page groups that have authentication requirements upon them can be set in the Administrator system. After a page group has been authenticated, a user can submit the file forward to invoke the next stages of its workflow.

|  | PAGE   | EDIT STATUS    |
|--|--|----------------|
| Introduction and Instructions                      | Introduction and Instructions                            | Authenticated  |
| SECTION I: Proposed Intermediary Background        | SECTION I: Proposed Intermediary Background              | Authenticated  |
| SECTION I: Proposed Intermediary Background        | SECTION I: Proposed Intermediary Background              | Authenticated  |
| SECTION II: Proposed Intermediary Interaction with | SECTION II: Proposed Intermediary Interaction with       | Authenticated  |
| SECTION II: Proposed Intermediary Interaction with | SECTION III: General Compliance                          | Authenticated  |
| SECTION II: Proposed Intermediary Interaction with | SECTION III: General Compliance                          | Authenticated  |
| SECTION III: General Compliance                    | SECTION IV: Anti-Corruption                              | Authenticated  |
| SECTION III: General Compliance                    | SECTION V: Trade   | Authenticated  |
| SECTION III: General Compliance                    | SECTION V: Trade   | Authenticated  |
| SECTION IV: Anti-Corruption                        | Data Privacy Statement                                   | Authenticated  |
| SECTION V: Trade                                   | Affirmation  | Authenticated  |
| SECTION V: Trade                                   | Summary of Anti-Corruption and Trade Compliance Policies | ● ● ● Checking |
| SECTION V: Trade                                   |  |                |

RUN AUTHENTICATION

Tool Tips

Tool tips are helpful sets of information that appear upon hover-over of a word or set of words within a question. Typically, they include a definition of the highlighted word(s) or further clarification of the term. Tool tips can be set in the Administrator system and help to speed data entry and eliminate confusion.

Se

An employee or official of any Government or Government Entity, as defined above, and/or any candidate for public office.

PR

\* Does ABC Company have any business, economic, or personal dealings, either current or over the past five years, with any **Government Official(s)**?

Select

Auditing Data

Third party auditors that will not be using the Compliance Officer Workstation also may be granted permission to audit a file directly at the questionnaire. Status can be set at the page, section, and question level, and notes can be provided to bring clarity to the audit notation.

\* Current officials, employees or representatives of any political party, or a candidate for any political office?

No

Notes For Question "Current officials, employees or representatives of any political party, or a candidate for any political office?"

Status

Approved

Declined

Further Clarification

Request Additional Information

\* Past officials of any of the above-described government bodies, enterprises, political parties, or public international organizations?

No

Request Additional Information

An auditor can request additional information on a page, section or question. In doing this, they can add a note to the request, clarifying the missing information needed. During the audit process, the system will compile all requests for additional information and kit them up into a singular communication. The auditor can send communication to the party responsible for providing additional information, which will contain the actual questions and notes upon them. At this time, the auditor can “unlock” the field or fields so that the contributor can provide the missing data. When that user logs in, he or she will see the request in a focused view, and all communication surrounding the requests will be threaded and displayed appropriately.

|  |  |   |
|--|--|---|
| SECTION I: Proposed Intermediary Background              | DATE   | NAME  |
| SECTION II: Proposed Intermediary Interaction with       | 9/27/2013 1:25:50 PM   | Request For SECTION IV: Anti-Corruption, Anti-Corruption Practices, 1 Please describe |
| SECTION III: General Compliance                          | QUESTION   | VALUES  |
| SECTION III: General Compliance                          | SECTION IV: Anti-Corruption / Anti-Corruption Practices / Please describe (@71527)'s process(es) for compliance with applicable anti-corruption laws and regulations | NOTE  |
| SECTION IV: Anti-Corruption                              | VALUES   | NOTE  |
| SECTION V: Trade   | SECTION IV: Anti-Corruption / Anti-Corruption Practices / Please describe (@71527)'s process(es) for compliance with applicable anti-corruption laws and regulations | Please translate your answer to English   |
| SECTION V: Trade   | SECTION V: Trade   |   |
| Data Privacy Statement                                   | SECTION V: Trade   |   |
| Affirmation  | Data Privacy Statement   |   |
| Summary of Anti-Corruption and Trade Compliance Policies | Affirmation  |   |
| Review   | Summary of Anti-Corruption and Trade Compliance Policies   |   |

SEND

ANTI-CORRUPTION PRACTICES

\* Please describe ABC Corp's process(es) for compliance with applicable anti-corruption laws and regulations

SECTION IV: Anti-Corruption / Anti-Corruption Practices / Please describe (@71527)'s process(es) for compliance with applicable anti-corruption laws and regulations

NOTE

Please translate your answer to English

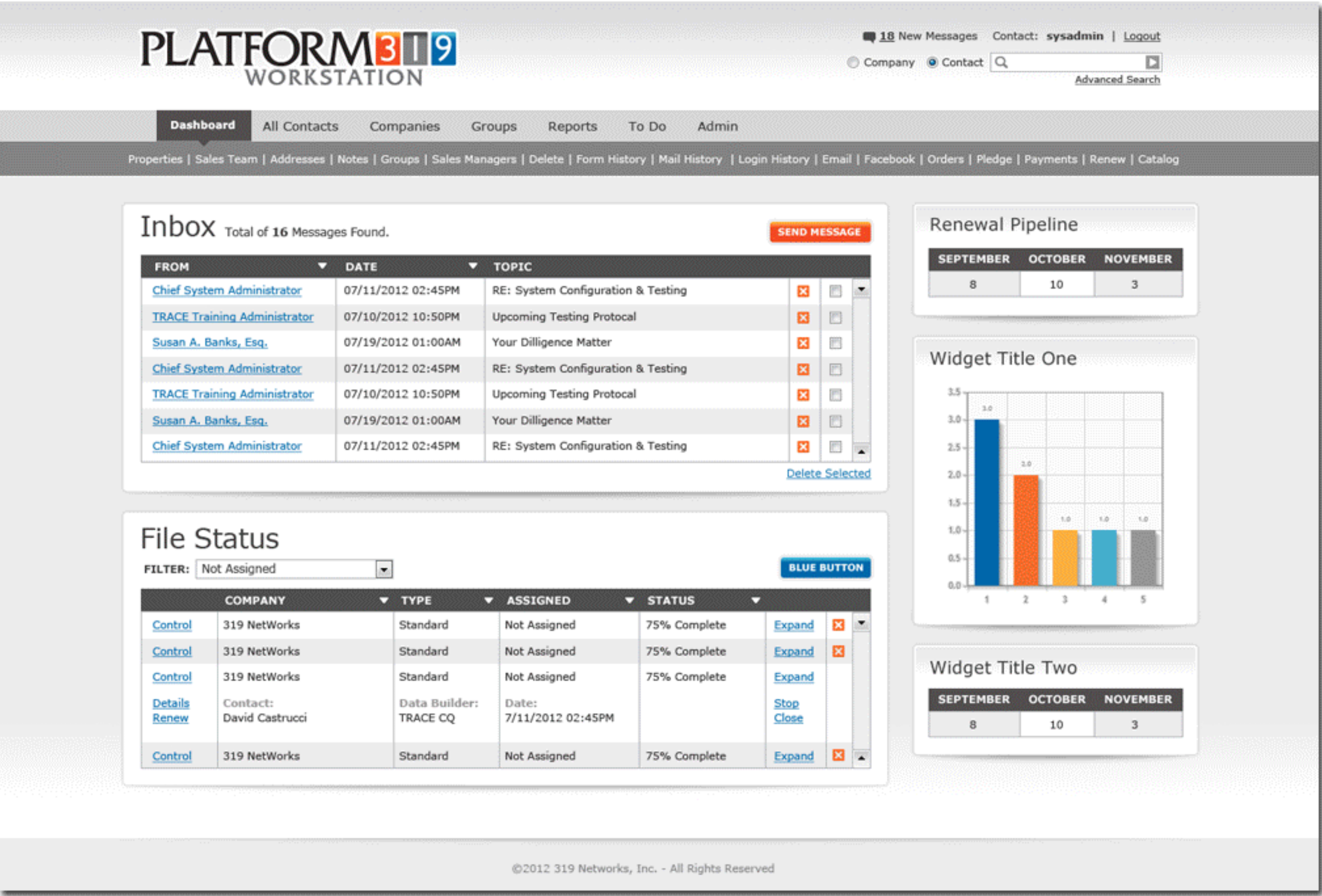


THE COMPLIANCE OFFICER WORKSTATION

The compliance officer workstation contains thousands of tools to bring about efficiency and total control to the company’s compliance officer. Highlighted features include:

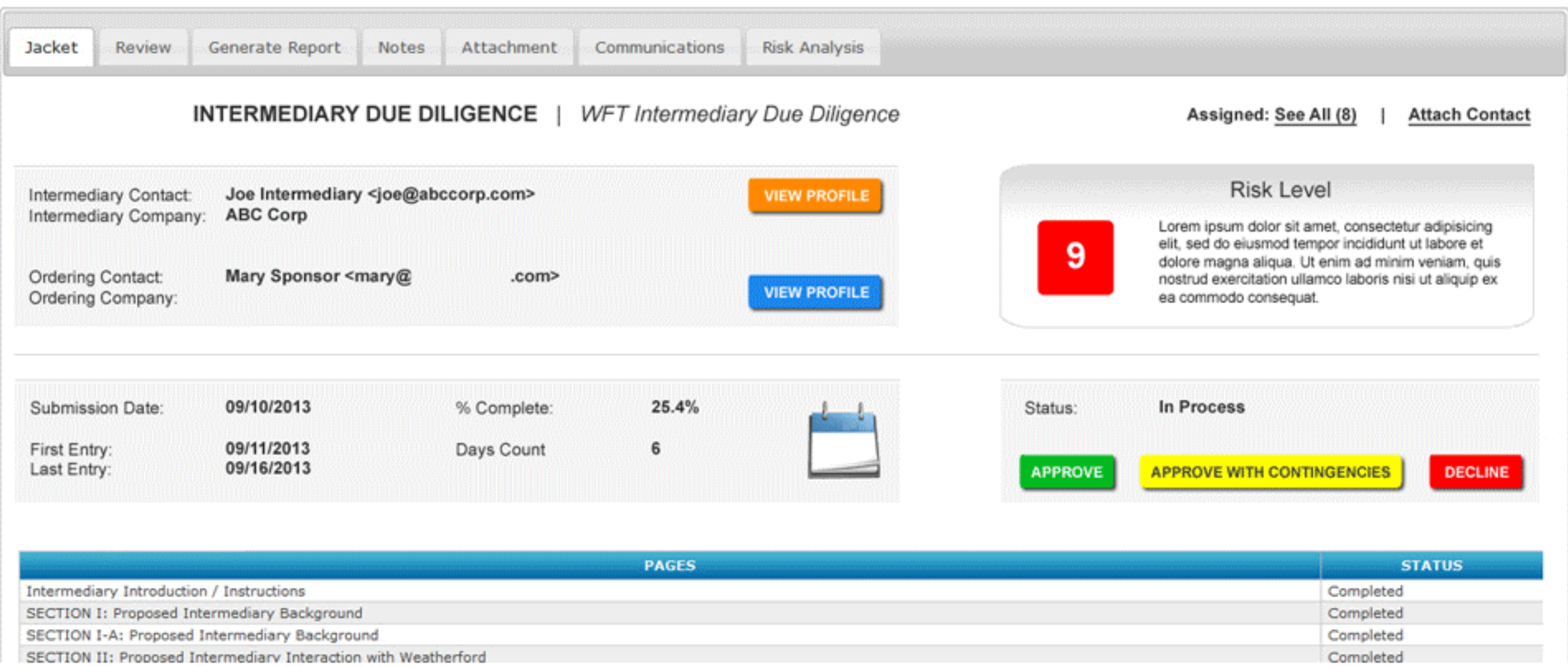
Dashboard

The compliance officer dashboard shows a view of important notifications, alerts, tasks, and assignments in a consolidated view. Each compliance officer’s dashboard can be customized to display those parts that are most relevant. The dashboard is the first view that appears upon logging into the Compliance Officer Workstation. Dashboard functions are also a product of permissions, such that a manager will have a different access level compared to a down-line staff member.



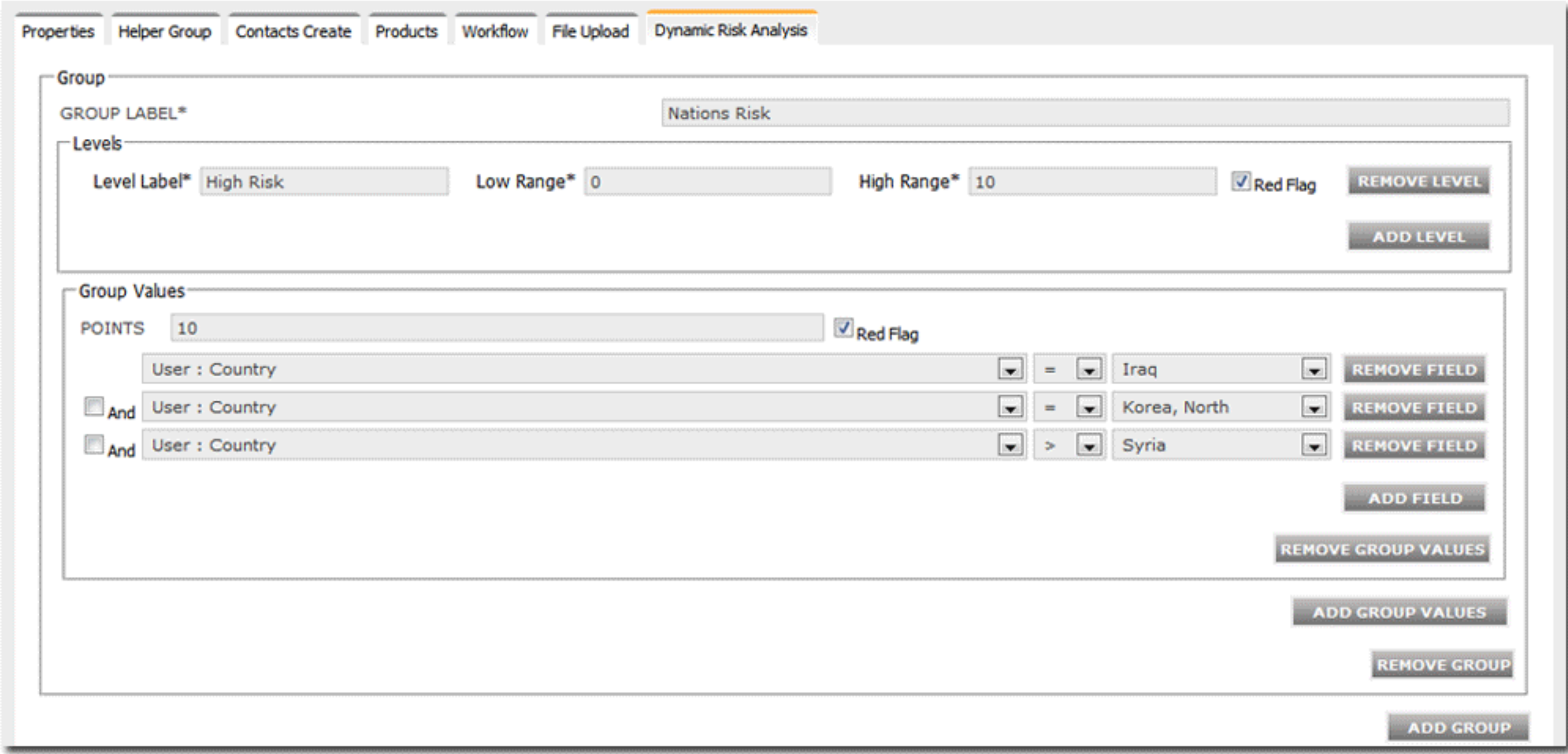
File Jacket

Due diligence cases are provided with a “file jacket”, which provides an at-a-glance view of important information surrounding the file. The file jacket displays file statuses, assignments, critical dates, risk analysis notifications, and approval buttons (depending on permissions).



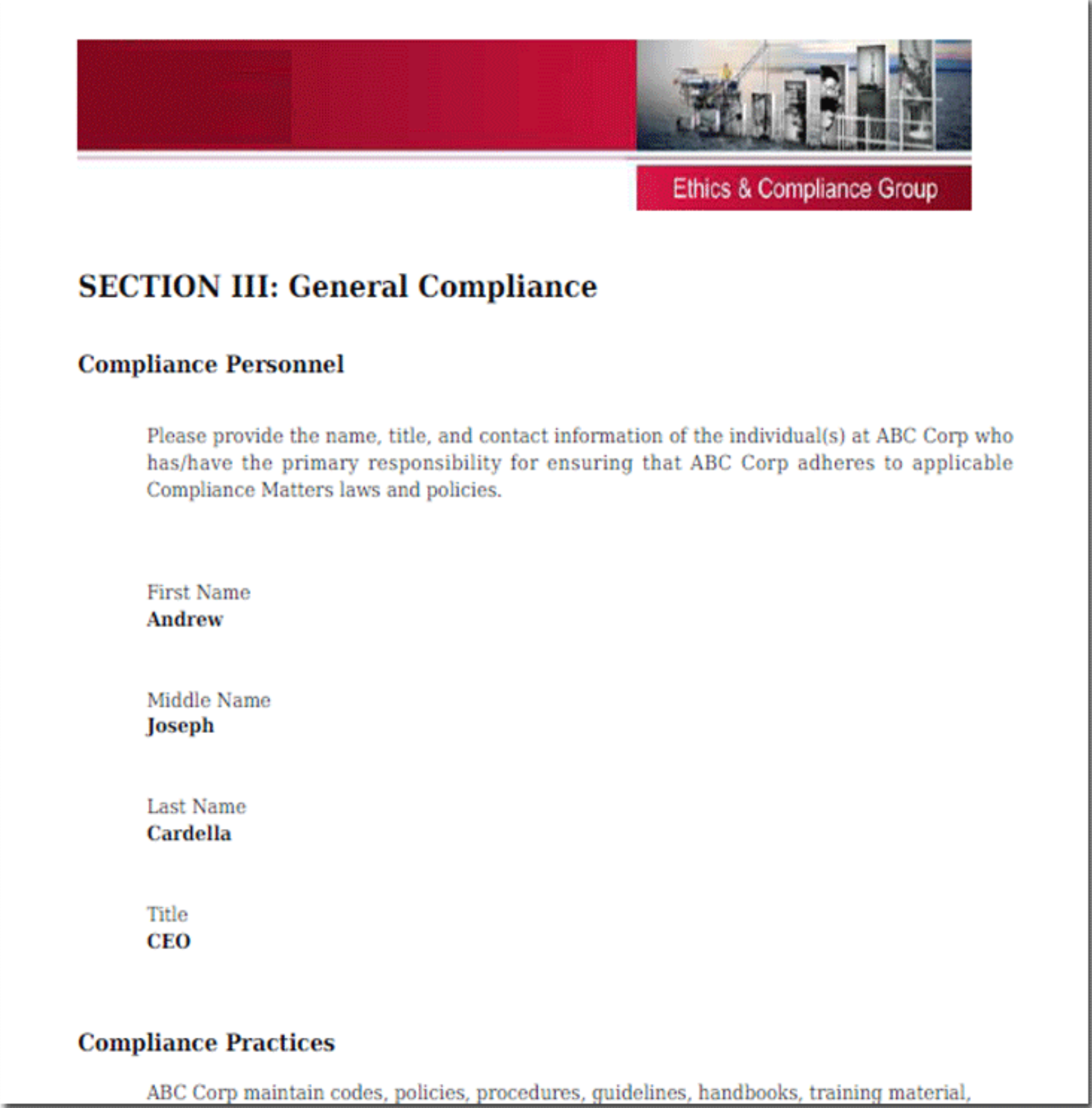
Risk Analysis

The risk analysis system is a fully dynamic system, allowing you to build up limitless risk scenarios that are most relevant to your organization. Administrators can set point values for certain risk scenarios, and arrange for red flags to appear accordingly.



Compliance Reports

Reports can be generated from the compliance officer workstation, including mini and full reports. Questions can be marked for inclusion in either or both reports, and can even be displayed in a different manner in the report compared to the forward-facing questionnaire. Administrators can set a custom header and footer of the report to match branding or other guidelines. The report engine tracks the number of instances and the date/time when a report has been generated for further compliance purposes.





319 NetWorks is a Charleston, SC based web solutions provider to companies across the globe. Our organization is built on the foundation that the digital tools used in business must be purposeful, dynamic, reconfigurable, scalable and secure.

Throughout the 10+ year history of the company, we have invested millions in the development of Platform319 - a suite of solutions that empower the rapid design, layout, configuration, development, and management of advanced websites, portals, interactive communications, and file collaboration.

Our mission is to gain a thorough understanding of our clients' business, their needs, goals, & desires, and deliver world-class solutions that empower growth, scalability, and ROI. We specialize in solving unique business challenges with rich, value-added applications. Our "no-coding" environment enables businesses to easily manage all aspects of web assets.

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