

Sanctions Screening Standard (v5.3)

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Version	Date	Change
5.3	January 2026	Fuzzy-match thresholds recalibrated
5.2.1	July 2025	Minor corrections; formatting
5.2	April 2025	Crypto-asset transfer screening in scope
5.1	September 2024	List-management remediation following internal audit review

[Earlier versions omitted]

Contents

1. Purpose
2. Lists and list management
3. Customer screening
4. **Transfer screening**
5. Match handling
6. Governance
- Appendix A: Lists in scope

Sections in bold are excerpted below.

[Sections 1 to 3 omitted]

4. Transfer screening

4.1 Outbound transfers of funds and crypto-assets are screened before release, and inbound transfers before funds or assets are made available.

4.2 Screening runs against the parties to the transfer as they appear in the transfer message: the name, address and identifier fields as submitted for screening.

4.3 Potential matches are held pending review; confirmed matches are blocked or frozen and escalated in accordance with §5.

4.4 Matching uses fuzzy logic calibrated to balance detection against alert volume; thresholds and their calibration evidence are governed under §6.

[Sections 5 onward omitted]