# Below-the-Line Analysis

AML-EBB-IFT-ALL-A-D30-EOP

Summary of Threshold Decisions

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Population** | **Parameter** | **Current Threshold** | **BTL Threshold** | **Recommended Threshold** |
| Personal High | Minimum Value | $10,000.00 | $7,500.00 | $10,000.00 |
| Personal High | Minimum Volume | 4 | 3 | 3 |
| Personal High | No. of Occurrences | 2 | 1 | 1 |
| Personal Non-High | Minimum Value | $14,000.00 | $10,000.00 | $14,000.00 |
| Personal Non-High | Minimum Volume | 4 | 3 | 3 |
| Personal Non-High | No. of Occurrences | 2 | 1 | 1 |

#### Personal High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. Eight (8) rule breaks generated during the testing period, which were reviewed by the Bank for quality and used for analysis.

##### Minimum Value

Production below-the-line calibration was conducted on the Minimum Value threshold, which was lowered from the production value of $10,000.00 to the below-the-line testing value of $7,500.00. Rule breaks were generated for values ranging between $30,950.00 and $2,609,910.00. Analysis revealed one (1) interesting rule break in the population of Eight (8) rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Minimum Value threshold at $10,000.00.

##### Minimum Volume

Production below-the-line calibration was conducted on the Minimum Volume threshold, which was lowered from the production value of four (4) to the below-the-line testing value of three (3). Rule breaks were generated solely at a value of three (3). Analysis revealed one (1) interesting rule break in the population of Eight (8) rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the Minimum Volume threshold from four (4) to three (3). At the recommended threshold, the effectiveness of the delta population is 12.50%.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of two (2) to the below-the-line testing value of one (1). Rule breaks were generated for values ranging between one (1) and two (2). Analysis revealed one (1) interesting rule break in the population of Eight (8) rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the No. of Occurrences threshold from two (2) to one (1). At the recommended threshold, the effectiveness of the delta population is 12.50%.

#### Conclusion

Adjusting the No. of Occurrences, and Minimum Volume parameters to one (1), and three (3) while maintaining the Minimum Value parameter at $10,000.00. is expected to result in a delta population effectiveness of 12.50%. The segment is expected to generate approximately ## additional rule breaks per month.

#### Personal Non-High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. 40 rule breaks generated during the testing period, which were reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of two (2) to the below-the-line testing value of one (1). Rule breaks were generated for values ranging between one (1) and five (5). Analysis revealed three (3) interesting rule breaks in the population of 40 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the No. of Occurrences threshold from two (2) to one (1). At the recommended threshold, the effectiveness of the delta population is 7.50%.

##### Minimum Value

Production below-the-line calibration was conducted on the Minimum Value threshold, which was lowered from the production value of $14,000.00 to the below-the-line testing value of $10,000.00. Rule breaks were generated for values ranging between $10,103.96 and $769,391.68. Analysis revealed three (3) interesting rule breaks in the population of 40 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Minimum Value threshold at $14,000.00.

##### Minimum Volume

Production below-the-line calibration was conducted on the Minimum Volume threshold, which was lowered from the production value of four (4) to the below-the-line testing value of three (3). Rule breaks were generated for values ranging between three (3) and five (5). Analysis revealed three (3) interesting rule breaks in the population of 40 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the Minimum Volume threshold from four (4) to three (3). At the recommended threshold, the effectiveness of the delta population is 7.50%.

#### Conclusion

Adjusting the No. of Occurrences, and Minimum Volume parameters to one (1), and three (3) while maintaining the Minimum Value parameter at $14,000.00. is expected to result in a delta population effectiveness of 11.54% The segment is expected to generate approximately ## additional rule breaks per month.

AML-EBO-IFT-ALL-P-D05-EOP

Summary of Threshold Decisions

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Population** | **Parameter** | **Current Threshold** | **BTL Threshold** | **Recommended Threshold** |
| Business Non-High | Minimum Value | $5,000.00 | $3,700.00 | $5,000.00 |
| Business Non-High | Minimum Volume | 3 | 2 | 3 |
| Business Non-High | No. of Occurrences | 1 | 1 | 1 |

#### Business Non-High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. 23 rule breaks generated during the testing period, which were reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of one (1) to the below-the-line testing value of one (1). Rule breaks were generated for values ranging between one (1) and five (5). Analysis revealed zero (0) interesting rule breaks in the population of 23 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the No. of Occurrences threshold at one (1).

##### Minimum Value

Production below-the-line calibration was conducted on the Minimum Value threshold, which was lowered from the production value of $5,000.00 to the below-the-line testing value of $3,700.00. Rule breaks were generated for values ranging between $6,810.29 and $1,555,362.00. Analysis revealed zero (0) interesting rule breaks in the population of 23 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Minimum Value threshold at $5,000.00.

##### Minimum Volume

Production below-the-line calibration was conducted on the Minimum Volume threshold, which was lowered from the production value of three (3) to the below-the-line testing value of two (2). Rule breaks were generated solely at a value of two (2). Analysis revealed zero (0) interesting rule breaks in the population of 23 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Minimum Volume threshold at three (3).

#### Conclusion

Maintaining the No. of Occurrences, Minimum Value, and Minimum Volume parameters at one (1), $5,000.00, and three (3). will result in no impact to the current alert output in the system.

AML-FTF-AWR-CSH-A-D05-FTR

Summary of Threshold Decisions

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Population** | **Parameter** | **Current Threshold** | **BTL Threshold** | **Recommended Threshold** |
| Business Non-High | No. of Occurrences | 3 | 2 | 3 |
| Business Non-High | Ratio Lower Bound | 90.00% | 80.00% | 90.00% |
| Business Non-High | Ratio Upper Bound | 110.00% | 120.00% | 110.00% |
| Business Non-High | Sum Lower Bound | $150,000.00 | $110,000.00 | $150,000.00 |
| Personal High | No. of Occurrences | 2 | 2 | 2 |
| Personal High | Ratio Lower Bound | 90.00% | 80.00% | 80.00% |
| Personal High | Ratio Upper Bound | 110.00% | 120.00% | 120.00% |
| Personal High | Sum Lower Bound | $5,000.00 | $3,700.00 | $5,000.00 |
| Personal Non-High | No. of Occurrences | 2 | 2 | 2 |
| Personal Non-High | Ratio Lower Bound | 90.00% | 80.00% | 83.00% |
| Personal Non-High | Ratio Upper Bound | 110.00% | 120.00% | 117.00% |
| Personal Non-High | Sum Lower Bound | $5,300.00 | $3,900.00 | $5,300.00 |

#### Business Non-High

### Threshold Recommendation

No alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023; therefore, no analysis was performed. The current thresholds are recommended to be maintained.

#### Personal High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. Seven (7) rule breaks generated during the testing period, which were reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of two (2) to the below-the-line testing value of two (2). Rule breaks were generated for values ranging between two (2) and three (3). Analysis revealed two (2) interesting rule breaks in the population of Seven (7) rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the No. of Occurrences threshold at two (2).

##### Ratio Lower Bound

Production below-the-line calibration was conducted on the Ratio Lower Bound threshold, which was lowered from the production value of 90.00% to the below-the-line testing value of 80.00%. Rule breaks were generated for values ranging between 0.82% and 1.18%. Analysis revealed two (2) interesting rule breaks in the population of Seven (7) rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the Ratio Lower Bound threshold from 90.00% to 80.00%. At the recommended threshold, the effectiveness of the delta population is nan%.

##### Ratio Upper Bound

Production below-the-line calibration was conducted on the Ratio Upper Bound threshold, which was lowered from the production value of 110.00% to the below-the-line testing value of 120.00%. Rule breaks were generated for values ranging between 0.82% and 1.18%. Analysis revealed two (2) interesting rule breaks in the population of Seven (7) rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the Ratio Upper Bound threshold from 110.00% to 120.00%. At the recommended threshold, the effectiveness of the delta population is 28.57%.

##### Sum Lower Bound

Production below-the-line calibration was conducted on the Sum Lower Bound threshold, which was lowered from the production value of $5,000.00 to the below-the-line testing value of $3,700.00. Rule breaks were generated for values ranging between $4,166.72 and $15,582.78. Analysis revealed two (2) interesting rule breaks in the population of Seven (7) rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Sum Lower Bound threshold at $5,000.00.

#### Conclusion

Adjusting the Ratio Lower Bound, and Ratio Upper Bound parameters to 80.00%, and 120.00% while maintaining the No. of Occurrences, and Sum Lower Bound parameters at two (2), and $5,000.00. is expected to result in a delta population effectiveness of 28.57%. The segment is expected to generate approximately ## additional rule breaks per month.

#### Personal Non-High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. 10 rule breaks generated during the testing period, which were reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of two (2) to the below-the-line testing value of two (2). Rule breaks were generated for values ranging between two (2) and three (3). Analysis revealed one (1) interesting rule break in the population of 10 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the No. of Occurrences threshold at two (2).

##### Ratio Lower Bound

Production below-the-line calibration was conducted on the Ratio Lower Bound threshold, which was lowered from the production value of 90.00% to the below-the-line testing value of 80.00%. Rule breaks were generated for values ranging between 0.85% and 1.17%. Analysis revealed one (1) interesting rule break in the population of 10 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the Ratio Lower Bound threshold from 90.00% to 83.00%. At the recommended threshold, the effectiveness of the delta population is nan%.

##### Ratio Upper Bound

Production below-the-line calibration was conducted on the Ratio Upper Bound threshold, which was lowered from the production value of 110.00% to the below-the-line testing value of 120.00%. Rule breaks were generated for values ranging between 0.85% and 1.17%. Analysis revealed one (1) interesting rule break in the population of 10 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the Ratio Upper Bound threshold from 110.00% to 117.00%. At the recommended threshold, the effectiveness of the delta population is 10.00%.

##### Sum Lower Bound

Production below-the-line calibration was conducted on the Sum Lower Bound threshold, which was lowered from the production value of $5,300.00 to the below-the-line testing value of $3,900.00. Rule breaks were generated for values ranging between $4,511.00 and $13,980.00. Analysis revealed one (1) interesting rule break in the population of 10 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Sum Lower Bound threshold at $5,300.00.

#### Conclusion

Adjusting the Ratio Lower Bound, and Ratio Upper Bound parameters to 83.00%, and 117.00% while maintaining the No. of Occurrences, and Sum Lower Bound parameters at two (2), and $5,300.00. is expected to result in a delta population effectiveness of 10.00%. The segment is expected to generate approximately ## additional rule breaks per month.

AML-FTF-CSH-AWR-A-D07-FTR

Summary of Threshold Decisions

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Population** | **Parameter** | **Current Threshold** | **BTL Threshold** | **Recommended Threshold** |
| Personal Non-High | No. of Occurrences | 2 | 2 | 2 |
| Personal Non-High | Ratio Lower Bound | 85.00% | 80.00% | 85.00% |
| Personal Non-High | Ratio Upper Bound | 115.00% | 120.00% | 115.00% |
| Personal Non-High | Sum Lower Bound | $5,600.00 | $4,200.00 | $5,600.00 |

#### Personal Non-High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. 11 rule breaks generated during the testing period, which were reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of two (2) to the below-the-line testing value of two (2). Rule breaks were generated for values ranging between two (2) and three (3). Analysis revealed zero (0) interesting rule breaks in the population of 11 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the No. of Occurrences threshold at two (2).

##### Ratio Lower Bound

Production below-the-line calibration was conducted on the Ratio Lower Bound threshold, which was lowered from the production value of 85.00% to the below-the-line testing value of 80.00%. Rule breaks were generated for values ranging between 0.84% and 1.18%. Analysis revealed zero (0) interesting rule breaks in the population of 11 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Ratio Lower Bound threshold at 85.00%.

##### Ratio Upper Bound

Production below-the-line calibration was conducted on the Ratio Upper Bound threshold, which was lowered from the production value of 115.00% to the below-the-line testing value of 120.00%. Rule breaks were generated for values ranging between 0.84% and 1.18%. Analysis revealed zero (0) interesting rule breaks in the population of 11 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Ratio Upper Bound threshold at 115.00%.

##### Sum Lower Bound

Production below-the-line calibration was conducted on the Sum Lower Bound threshold, which was lowered from the production value of $5,600.00 to the below-the-line testing value of $4,200.00. Rule breaks were generated for values ranging between $4,300.00 and $5,380.00. Analysis revealed zero (0) interesting rule breaks in the population of 11 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Sum Lower Bound threshold at $5,600.00.

#### Conclusion

Maintaining the No. of Occurrences, Ratio Lower Bound, Ratio Upper Bound, and Sum Lower Bound parameters at two (2), 85.00%, 115.00%, and $5,600.00. will result in no impact to the current alert output in the system.

AML-HBC-CCE-INN-A-M01-HBN

Summary of Threshold Decisions

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Population** | **Parameter** | **Current Threshold** | **BTL Threshold** | **Recommended Threshold** |
| Personal Non-High | Min Value | 3 | 2 | 3 |
| Personal Non-High | Minimal Current Month Sum | $5,000.00 | $5,000.00 | $5,000.00 |
| Personal Non-High | No. of Occurrences | 1 | 1 | 1 |
| Personal Non-High | STDEV exceeds Historical Average Count | 4.50 | 3.00 | 4.50 |

#### Personal Non-High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. 19 rule breaks generated during the testing period, which were reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of one (1) to the below-the-line testing value of one (1). Rule breaks were generated for values ranging between one (1) and two (2). Analysis revealed zero (0) interesting rule breaks in the population of 19 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the No. of Occurrences threshold at one (1).

##### STDEV exceeds Historical Average Count

Production below-the-line calibration was conducted on the STDEV exceeds Historical Average Count threshold, which was lowered from the production value of 4.50 to the below-the-line testing value of 3.00. Rule breaks were generated for values ranging between 3.00 and 10000.00. Analysis revealed zero (0) interesting rule breaks in the population of 19 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the STDEV exceeds Historical Average Count threshold at 4.50.

##### Minimal Current Month Sum

Production below-the-line calibration was conducted on the Minimal Current Month Sum threshold, which was lowered from the production value of $5,000.00 to the below-the-line testing value of $5,000.00. Rule breaks were generated solely at a value of $0.00. Analysis revealed zero (0) interesting rule breaks in the population of 19 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Minimal Current Month Sum threshold at $5,000.00.

##### Min Value

Production below-the-line calibration was conducted on the Min Value threshold, which was lowered from the production value of three (3) to the below-the-line testing value of two (2). Rule breaks were generated for values ranging between two (2) and nine (9). Analysis revealed zero (0) interesting rule breaks in the population of 19 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Min Value threshold at three (3).

#### Conclusion

Maintaining the No. of Occurrences, STDEV exceeds Historical Average Count, Minimal Current Month Sum, and Min Value parameters at one (1), 4.50, $5,000.00, and three (3). will result in no impact to the current alert output in the system.

AML-HBC-CCE-INN-A-M01-HBS

Summary of Threshold Decisions

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Population** | **Parameter** | **Current Threshold** | **BTL Threshold** | **Recommended Threshold** |
| Personal High | Minimal Current Month Sum | $8,000.00 | $6,000.00 | $8,000.00 |
| Personal High | No. of Occurrences | 1 | 1 | 1 |
| Personal High | STDEV exceeds Historical Average Sum | 4.20 | 3.00 | 4.20 |

#### Personal High

### Threshold Recommendation

No alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023; therefore, no analysis was performed. The current thresholds are recommended to be maintained.

AML-STR-CCE-INN-A-D01-DST

Summary of Threshold Decisions

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Population** | **Parameter** | **Current Threshold** | **BTL Threshold** | **Recommended Threshold** |
| Business Non-High | No. of Occurrences | 3 | 2 | 2 |
| Business Non-High | Sum Amount Lower Bound | $8,700.00 | $6,500.00 | $8,700.00 |
| Personal Non-High | No. of Occurrences | 3 | 2 | 2 |
| Personal Non-High | Sum Amount Lower Bound | $6,400.00 | $4,800.00 | $5,600.00 |

#### Business Non-High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. 773 rule breaks generated during the testing period, which were subsequently sampled using the standard methodology. The 287 sampled rule breaks were then reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of three (3) to the below-the-line testing value of two (2). Rule breaks were generated for values ranging between two (2) and seven (7). Analysis revealed 17 interesting rule breaks in the population of 287 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the No. of Occurrences threshold from three (3) to two (2). At the recommended threshold, the effectiveness of the delta population is 5.96%.

##### Sum Amount Lower Bound

Production below-the-line calibration was conducted on the Sum Amount Lower Bound threshold, which was lowered from the production value of $8,700.00 to the below-the-line testing value of $6,500.00. Rule breaks were generated for values ranging between $6,509.00 and $10,000.00. Analysis revealed 17 interesting rule breaks in the population of 287 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Sum Amount Lower Bound threshold at $8,700.00.

#### Conclusion

Adjusting the No. of Occurrences parameter to two (2) while maintaining the Sum Amount Lower Bound parameter at $8,700.00. is expected to result in a delta population effectiveness of 5.96%. The segment is expected to generate approximately ## additional rule breaks per month.

#### Personal Non-High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. 58 rule breaks generated during the testing period, which were reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of three (3) to the below-the-line testing value of two (2). Rule breaks were generated for values ranging between two (2) and three (3). Analysis revealed 16 interesting rule breaks in the population of 58 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the No. of Occurrences threshold from three (3) to two (2). At the recommended threshold, the effectiveness of the delta population is 27.59%.

##### Sum Amount Lower Bound

Production below-the-line calibration was conducted on the Sum Amount Lower Bound threshold, which was lowered from the production value of $6,400.00 to the below-the-line testing value of $4,800.00. Rule breaks were generated for values ranging between $5,000.00 and $10,000.00. Analysis revealed 16 interesting rule breaks in the population of 58 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the Sum Amount Lower Bound threshold from $6,400.00 to $5,600.00. At the recommended threshold, the effectiveness of the delta population is 35.14%.

#### Conclusion

Adjusting the No. of Occurrences, and Sum Amount Lower Bound parameters to two (2), and $5,600.00. is expected to result in a delta population effectiveness of 27.59%. The segment is expected to generate approximately ## additional rule breaks per month.

AML-STR-CCE-OUT-A-D01-DST

Summary of Threshold Decisions

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Population** | **Parameter** | **Current Threshold** | **BTL Threshold** | **Recommended Threshold** |
| Business Non-High | No. of Occurrences | 3 | 2 | 2 |
| Business Non-High | Sum Amount Lower Bound | $7,200.00 | $5,400.00 | $7,200.00 |
| Personal High | No. of Occurrences | 3 | 2 | 2 |
| Personal High | Sum Amount Lower Bound | $5,000.00 | $3,700.00 | $5,000.00 |
| Personal Non-High | No. of Occurrences | 3 | 2 | 2 |
| Personal Non-High | Sum Amount Lower Bound | $5,000.00 | $3,700.00 | $5,000.00 |

#### Business Non-High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. 226 rule breaks generated during the testing period, which were subsequently sampled using the standard methodology. The 153 sampled rule breaks were then reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of three (3) to the below-the-line testing value of two (2). Rule breaks were generated for values ranging between two (2) and five (5). Analysis revealed 16 interesting rule breaks in the population of 153 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the No. of Occurrences threshold from three (3) to two (2). At the recommended threshold, the effectiveness of the delta population is 10.46%.

##### Sum Amount Lower Bound

Production below-the-line calibration was conducted on the Sum Amount Lower Bound threshold, which was lowered from the production value of $7,200.00 to the below-the-line testing value of $5,400.00. Rule breaks were generated for values ranging between $5,413.64 and $10,000.00. Analysis revealed 16 interesting rule breaks in the population of 153 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Sum Amount Lower Bound threshold at $7,200.00.

#### Conclusion

Adjusting the No. of Occurrences parameter to two (2) while maintaining the Sum Amount Lower Bound parameter at $7,200.00. is expected to result in a delta population effectiveness of 10.46%. The segment is expected to generate approximately ## additional rule breaks per month.

#### Personal High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. 33 rule breaks generated during the testing period, which were reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of three (3) to the below-the-line testing value of two (2). Rule breaks were generated solely at a value of two (2). Analysis revealed eight (8) interesting rule breaks in the population of 33 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the No. of Occurrences threshold from three (3) to two (2). At the recommended threshold, the effectiveness of the delta population is 24.24%.

##### Sum Amount Lower Bound

Production below-the-line calibration was conducted on the Sum Amount Lower Bound threshold, which was lowered from the production value of $5,000.00 to the below-the-line testing value of $3,700.00. Rule breaks were generated for values ranging between $5,000.00 and $10,000.00. Analysis revealed eight (8) interesting rule breaks in the population of 33 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Sum Amount Lower Bound threshold at $5,000.00.

#### Conclusion

Adjusting the No. of Occurrences parameter to two (2) while maintaining the Sum Amount Lower Bound parameter at $5,000.00. is expected to result in a delta population effectiveness of 24.24%. The segment is expected to generate approximately ## additional rule breaks per month.

#### Personal Non-High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. 136 rule breaks generated during the testing period, which were subsequently sampled using the standard methodology. The 106 sampled rule breaks were then reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of three (3) to the below-the-line testing value of two (2). Rule breaks were generated solely at a value of two (2). Analysis revealed nine (9) interesting rule breaks in the population of 106 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the No. of Occurrences threshold from three (3) to two (2). At the recommended threshold, the effectiveness of the delta population is 8.65%.

##### Sum Amount Lower Bound

Production below-the-line calibration was conducted on the Sum Amount Lower Bound threshold, which was lowered from the production value of $5,000.00 to the below-the-line testing value of $3,700.00. Rule breaks were generated for values ranging between $5,000.00 and $10,000.00. Analysis revealed nine (9) interesting rule breaks in the population of 106 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Sum Amount Lower Bound threshold at $5,000.00.

#### Conclusion

Adjusting the No. of Occurrences parameter to two (2) while maintaining the Sum Amount Lower Bound parameter at $5,000.00. is expected to result in a delta population effectiveness of 8.65%. The segment is expected to generate approximately ## additional rule breaks per month.

AML-STR-CCE-OUT-A-S01-SST

Summary of Threshold Decisions

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Population** | **Parameter** | **Current Threshold** | **BTL Threshold** | **Recommended Threshold** |
| Business High | No. of Occurrences | 3 | 2 | 2 |
| Business High | Transaction Amount Lower Bound | $8,200.00 | $6,100.00 | $8,200.00 |
| Business Non-High | No. of Occurrences | 3 | 2 | 3 |
| Business Non-High | Transaction Amount Lower Bound | $8,200.00 | $6,100.00 | $8,200.00 |
| Personal Non-High | No. of Occurrences | 3 | 2 | 2 |
| Personal Non-High | Transaction Amount Lower Bound | $5,000.00 | $3,700.00 | $5,000.00 |

#### Business High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. 57 rule breaks generated during the testing period, which were reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of three (3) to the below-the-line testing value of two (2). Rule breaks were generated for values ranging between two (2) and four (4). Analysis revealed six (6) interesting rule breaks in the population of 57 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the No. of Occurrences threshold from three (3) to two (2). At the recommended threshold, the effectiveness of the delta population is 10.53%.

##### Transaction Amount Lower Bound

Production below-the-line calibration was conducted on the Transaction Amount Lower Bound threshold, which was lowered from the production value of $8,200.00 to the below-the-line testing value of $6,100.00. Rule breaks were generated for values ranging between $6,450.00 and $10,000.00. Analysis revealed six (6) interesting rule breaks in the population of 57 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Transaction Amount Lower Bound threshold at $8,200.00.

#### Conclusion

Adjusting the No. of Occurrences parameter to two (2) while maintaining the Transaction Amount Lower Bound parameter at $8,200.00. is expected to result in a delta population effectiveness of 10.53%. The segment is expected to generate approximately ## additional rule breaks per month.

#### Business Non-High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. 68 rule breaks generated during the testing period, which were reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of three (3) to the below-the-line testing value of two (2). Rule breaks were generated for values ranging between three (3) and 12.0. Analysis revealed zero (0) interesting rule breaks in the population of 68 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the No. of Occurrences threshold at three (3).

##### Transaction Amount Lower Bound

Production below-the-line calibration was conducted on the Transaction Amount Lower Bound threshold, which was lowered from the production value of $8,200.00 to the below-the-line testing value of $6,100.00. Rule breaks were generated for values ranging between $6,117.46 and $8,189.32. Analysis revealed zero (0) interesting rule breaks in the population of 68 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Transaction Amount Lower Bound threshold at $8,200.00.

#### Conclusion

Maintaining the No. of Occurrences, and Transaction Amount Lower Bound parameters at three (3), and $8,200.00. will result in no impact to the current alert output in the system.

#### Personal Non-High

### Threshold Recommendation

Alerts generated in the Actimize UAT environment between 07/01/2023 and 10/31/2023 were extracted for review. 198 rule breaks generated during the testing period, which were subsequently sampled using the standard methodology. The 136 sampled rule breaks were then reviewed by the Bank for quality and used for analysis.

##### No. of Occurrences

Production below-the-line calibration was conducted on the No. of Occurrences threshold, which was lowered from the production value of three (3) to the below-the-line testing value of two (2). Rule breaks were generated for values ranging between two (2) and three (3). Analysis revealed nine (9) interesting rule breaks in the population of 136 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to lower the No. of Occurrences threshold from three (3) to two (2). At the recommended threshold, the effectiveness of the delta population is 6.62%.

##### Transaction Amount Lower Bound

Production below-the-line calibration was conducted on the Transaction Amount Lower Bound threshold, which was lowered from the production value of $5,000.00 to the below-the-line testing value of $3,700.00. Rule breaks were generated for values ranging between $3,800.00 and $10,000.00. Analysis revealed nine (9) interesting rule breaks in the population of 136 rule breaks. ###INSERT TUNING DECISION### Therefore, it is recommended to maintain the Transaction Amount Lower Bound threshold at $5,000.00.

#### Conclusion

Adjusting the No. of Occurrences parameter to two (2) while maintaining the Transaction Amount Lower Bound parameter at $5,000.00. is expected to result in a delta population effectiveness of 6.62%. The segment is expected to generate approximately ## additional rule breaks per month.