



MANAGEMENT SUMMARY

Regulatory/Audit

Fed Exam

- AML Compliance submitted response and remediation plan. 12-month review of CTRs and 345 Branch Operations Risk Assessment was completed in August 2013, and submitted to management on 9/4/2013.

Internal audit of the Prime BSA and NetX Actimize PCS systems completed in early December 2013.

Projects/Work Efforts

2012/2013 Prime BSA Upgrade

- Project goal is to upgrade hardware and software to versions supported by vendors and become compliant with Technology Roadmap. This includes new servers for UAT, Production & Disaster Recovery; upgrading Windows server o/s and SQL Server database; and upgrading Prime Compliance Suite from version 8.0.2 to 9.0.4.
- Version 9.1 was released on June 8, 2012. We upgraded to 9.1 instead of 9.0.4 at no added cost.
- Original "Go Live" date was scheduled for June 20, 2012. Delay caused by server issues (delivery date and conflict in version support) and missing prerequisite software (Crystal Reports). FIS software is tested and certified on SQL Server 2008 R2, while DB's officially supported version is SQL Server 2008 R1GTO request for a server exception from DB London was rejected.
- UAT started on June 10, 2013. A number of rules needed to be configured and tested using 9.1 templates as 8.0.2 were out of date. There have been some issues regarding end user software (Windows platform, Lotus Notes, IE, and Acrobat versions). All issues have been resolved. Exceptions have been made regarding Repetitive rule template, uploading of emails via Lotus Notes, and printing of Crystal Reports.
- Go live date was originally scheduled for 9/9/2013, but has been pushed back to 10/7/2013. Prime 9.1 is now live.
- No large "show-stopper" errors with Prime 9.1, several small errors were discovered and communicated to FIS.

Semi-Annual Fuzzy Logic Testing

- Testing of Prime OFAC Fuzzy Logic in UAT was completed on February 27, 2013. Cross-field validation still not working as expected. Worked with GTO to test Production data in UAT before implementing changes in Production. However, due to issues with UAT environment, changes could not be made.
- Received training material from FIS. Plan is to test in 8.0.2 and 9.1 UAT environments after all other UAT testing (for Prime upgrade) has been completed.
- Testing was not done in 2013 as Clarissa Delafuente was on maternity leave when the Prime upgrade was completed. Testing rescheduled for end of March 2014.

PB and PCS Annual AML Monitoring Program Review