


**THIS IS OUR
REQUEST FOR
INFORMATION
GUIDELINES**



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Western Union Business Solutions is committed to ensuring your international payments meet regulatory standards and guidelines by conducting Enhanced Due Diligence (EDD) and gathering Know Your Customer (KYC) information on a payment.

REQUEST FOR INFORMATION

We have implemented a Request for Information (RFI) procedure to fulfill our regulatory obligation to combat fraud, money laundering and terrorist financing.

The following is a general summary of the RFI procedures and support required from our FI clients:

- 1** Western Union Business Solutions client support team will reach out to the FI client with the requested information.
- 2** The FI client should check their internal KYC records and reach out to their customer to gather the requested EDD/KYC information.
- 3** The FI client will return the RFI with the information and documentation related to the RFI.
- 4** Western Union Business Solutions will make a risk-based decision to process the payment or return the payment to the FI client.
 - The transaction monitoring team may have additional questions that arise from the answers provided by the FI client's customer and reviews are not limited to a one-time request.

Examples of KYC and EDD information may include, but are not limited to, the following:



Source of funds (bank statements can be requested).



Documentation to confirm the nature of the transaction (i.e. invoices, contracts, bill of sale, real estate records, etc.)



Details on the FI client's customer (KYC details, ownership information, etc.)



The nature of the relationship between the remitter and beneficiary.

PAYMENT CANCELLATION

Western Union Business Solutions would like its FI clients to understand the top reasons why payments are cancelled:

Prohibited industry

Either the remitter or beneficiary appear to be involved in a prohibited industry as outlined on page 7.

Outstanding RFI

An outstanding RFI exists that has not been answered regarding the remitter or beneficiary on previous activity processed by Western Union Business Solutions.

Internal investigation

A current or previous internal investigation on the remitter or beneficiary.

Negative news

Significant negative news exists associated with a remitter or beneficiary which resulted in an internal investigation and an internal interdiction.

Fraudulent activity

The remitter or beneficiary appear to be involved in or a victim of fraudulent activity.

Western Union Business Solutions reserves the right to make a risk-based decision to not process payments related to a specific remitter or beneficiary. Please note that due to legal and regulatory obligations, in some instances Western Union Business Solutions may not be able to provide additional information regarding the internal risk-based decision.

In the case of cancelled payments, Western Union Business Solutions strongly encourages its FI clients to have an internal escalation process by which a compliance officer can review the circumstances surrounding the specific payment(s).



FINANCIAL INSTITUTION COMPLIANCE CONTACTS

Do any of your clients fall into the following categories?

Special handling

- Embassies, Diplomatic Missions and Consulates
- Shell Companies
- Sexually Explicit Content
- Cross-Border Debt Collection
- Precursor Chemicals
- Dealers in Precious Metals, Stones and Jewelry
- Casinos and other Wagering Institutions
- Arms/Defense
- Non-Fiat Currency (including open loop virtual currency)
- Used automobile dealers and sellers of used car parts (chop shops)
- Private Security Firms/Private Military Contractors
- Providers of online lottery, mail order lotteries and sweepstakes, including internet gambling
- Litigation Finance Companies

Prohibited industries

- Unlawful Internet Gambling
- Shell Banks
- Prostitution
- Marijuana Industry and other Recreational Drug Industries
- Unlicensed Financial Institutions
- Rough Diamond Trade
- Counterfeit/Pirated Goods
- Illegal Activities

To help ensure Western Union Business Solutions is communicating with the appropriate compliance contacts at your financial institution, please provide below the BSA/AML compliance personnel you would like Western Union Business Solutions to include on transaction concerns, upcoming compliance events such as webinars, on-site meetings and presentations.

Name	Title	E-mail	Phone
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
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To learn more or to speak with your account representative, please contact us at:

Phone: 1.800.897.6333

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business.westernunion.ca/financial

