



01_Compliance_AML_Summary

Compliance & AML Summary

HISN — Financial Crime Decision Operating System Version: 3.0 | Date: October 2026 Owner: Money Laundering Reporting Officer (MLRO) / Compliance Lead Classification: Confidential | Status: Framework

Document Control

Field

Value

Document Title

Compliance & AML Summary

Version

3.0



Date

October 2026

Owner

MLRO / Compliance

Classification

Confidential

Status

Framework

Basis of Preparation

Repository evidence, regulatory framework analysis

Limitations

No independent compliance review. No SAMA certification.

Provenance Taxonomy

ACTUAL / EXTERNAL FACT / MANAGEMENT ASSUMPTION / DERIVED / SCENARIO / UNKNOWN

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1. Regulatory Landscape (Saudi Arabia)

HISN operates in a market regulated by:

Authority



Scope

SAMA

Banks, PSPs, Exchange

CMA

Capital markets

Insurance Authority

Insurance

SDAIA

Data protection (PDPL)

NCA

Cybersecurity (ECC)

Classification: EXTERNAL FACT — Tier 1 sources.

2. HISN's Regulatory Position

What HISN IS: - A technology provider - Designed for alignment with SAMA/CMA/NCA/PDPL - Audit-grade evidence and decision lineage - Vendor-neutral

What HISN is NOT: - Not SAMA-certified - Not CMA-approved - Not a licensed financial institution - Not a regulator

Classification: ACTUAL — no certification obtained.



3. AML / CFT Framework

HISN supports customer AML/CFT programs through:

Capability

Status

Transaction Monitoring

Built

Sanctions Screening

Built

PEP Screening

Partial

KYC

Built

KYB

Built

Graph Intelligence



Built

Case Management

Built

SAR/STR Workflow

Framework

Classification: MANAGEMENT ASSESSMENT – based on repository.

4. KSA Compliance Considerations

Requirement

HISN Support

Status

10-year record retention

Design available

MANAGEMENT ASSESSMENT

Risk-based approach

Decision runtime supports

MANAGEMENT ASSESSMENT

SAR/STR workflow



Framework

MANAGEMENT ASSESSMENT

Ongoing CDD

Framework

MANAGEMENT ASSESSMENT

Data residency (PDPL)

Options available

MANAGEMENT ASSESSMENT

5. FATF Alignment

HISN is designed to align with FATF Recommendations:

Rec.

Topic



HISN Support

R.10

Customer Due Diligence

KYC/KYB engines

R.11

Record Keeping

Evidence + Audit

R.12

PEP

Partial capability

R.15

New Technologies

Risk-based runtime

R.16

Wire Transfers

Remittance support

R.17

Third Parties

TSP control plane

R.18

Internal Controls

Governance + audit

R.19

Higher-Risk Countries

Country rules

R.20



STR

SAR/STR workflow

R.21

Tipping Off

RBAC + confidentiality

Classification: Design intent – NOT certified compliance.

6. Compliance Gaps

Item

Priority

Owner

No independent compliance review

HIGH

MLRO

No SAMA CSF certification

HIGH

CISO

No formal regulatory engagement



MEDIUM

CEO

PEP capability partial

MEDIUM

Product

SAR/STR workflow framework only

MEDIUM

Product

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7. Customer Responsibility

HISN is a technology provider. **Regulatory status remains with the customer institution.**

Customers remain responsible for: - Regulatory licensing - Regulatory reporting (SAR/STR filing) - AML/CFT program ownership - MLRO appointment and independence - Record retention compliance

HISN provides the technology infrastructure to support these obligations.

8. Disclaimer

This Compliance & AML Summary is prepared to an audit-ready standard. **No regulatory certification or independent compliance review has been obtained.**

HISN does not claim SAMA approval, CMA approval, or FATF compliance. HISN is designed for alignment with applicable frameworks.

HISN FCDOS — Where Trust Begins. *Confidential — Not for Distribution*