WoWyrd

CONFIDENTIAL

WOWYRD · RULE REVIEW

Rule review: extended management report, all business lines

Prepared for **Demo client with 3 business lines (synthetic)**

Client: Demo client with 3 business lines (synthetic). Business lines: 3. Generated: 2026-11-20 10:02 UTC.

- Bank transfers: data 2022-09-01 to 2022-09-18 (daily periods), cut-off 2022-09-18, currency USD.
- SEPA transfers: data 2026-10-01 to 2026-11-29 (daily periods), cut-off 2026-11-29, currency USD.
- Mobile money: data 2017-01-01 to 2017-01-31 (daily periods), cut-off 2017-01-31, currency USD.

Demo run. The unit costs are demo values, not a client's costs. The transactions and labels are synthetic.

Internal report. Do not share it outside your firm.

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> This is the extended management report. The short management report is management.html; the technical report is technical.html.

Headline numbers, all lines

172,002
Transactions reviewed
Transactions files, all lines

150,218
Alerts
Rule-hit logs, all lines

9,198
Confirmed fraud
Labels files, each line's cut-off

131,082
False alarms
Mature hits, all lines

637,881.60 USD
False-alarm cost (estimate)
Your unit costs

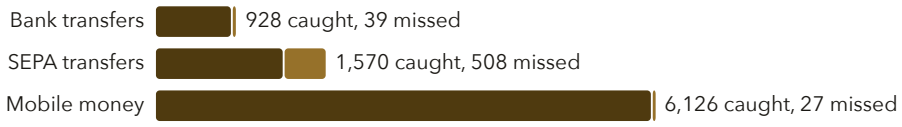
93.8%
Share of fraud with a rule hit
Added counts, all lines

Per business line

BUSINESS LINE	DATA	TRANSACTIONS	ALERTS	CONFIRMED FRAUD	FRAUD WITH A RULE HIT	SHARE OF FRAUD WITH A RULE HIT	FALSE ALARMS	ANALYST HOURS ON FALSE ALARMS	FALSE-ALARM COST (ESTIMATE)
Bank transfers	2022-09-01 to 2022-09-18 (daily periods)	58,331	53,483	967	928	96.0%	50,302	5,030.2	249,889.60 USD
SEPA transfers	2026-10-01 to 2026-11-29 (daily periods)	59,161	42,310	2,078	1,570	75.6%	35,155	3,515.5	168,992.00 USD
Mobile money	2017-01-01 to 2017-01-31 (daily periods)	54,510	54,425	6,153	6,126	99.6%	45,625	4,562.5	219,000.00 USD
Total	**all lines**	**172,002**	**150,218**	**9,198**	**8,624**	**93.8%**	**131,082**	**13,108.2**	**637,881.60 USD**

Totals add counts. A share in the total row is computed again from the added counts, never by averaging the lines' shares. All lines use USD, so amounts are added too. Each line name opens that line's own report.

Charts



CONFIRMED FRAUD PER LINE. BLUE: A RULE FIRED ON THE PAYMENT. ORANGE: NO RULE FIRED. SOURCE: EACH LINE'S LABELS AND RULE-HIT LOG.



FALSE ALARMS PER LINE: MATURE ALERTS WITH NO FRAUD AND NO DISPUTED LABEL. SOURCE: EACH LINE'S RULE-HIT LOG AND LABELS.

Top actions per business line

BUSINESS LINE	ACTION	TYPE	EXPECTED EFFECT (BACKTEST)	CONFIDENCE
Bank transfers	Retire rule Money sent to 5+ different recipients within 5 days (fan-out): 0.5% of its 39,145 alerts with a known outcome were fraud `tp_u21_fan_out_5_benef_5d`: Finds one sender spreading money to many receivers in a short time.	Retire the rule	7,624 fewer alerts, 40 caught fraud cases lost, 36,403.20 USD saved (estimate)	medium
Bank transfers	Retire rule More than 2 wire transfers in 7 days: 0.0% of its 528 alerts with a known outcome were fraud `tp_u21_wire_count_gt2_7d`: Finds a sender who uses wire transfers unusually often.	Retire the rule	132 fewer alerts, 0 caught fraud cases lost, 633.60 USD saved (estimate)	high
Bank transfers	Retire rule 20+ small payments in 5 days, over 20,000 USD in total: 0.6% of its 324 alerts with a known outcome were fraud `tp_u21_stats_20tx_0_1k_5d`: Finds many small payments that together move a large sum.	Retire the rule	29 fewer alerts, 0 caught fraud cases lost, 139.20 USD saved (estimate)	high
SEPA transfers	Retire rule Many small payments in, then sent out within a day: 2.9% of its 621 alerts with a known outcome were fraud `tp_ffiec_small_in_rapid_out_24h`: Finds an account that collects several small payments and passes most of the money on at once.	Retire the rule	1 fewer alerts, 0 caught fraud cases lost, 4.80 USD saved (estimate)	high
SEPA transfers	Retire rule Money in, then almost all of it sent on within 3 days (layering): 2.1% of its 575 alerts with a known outcome were fraud `tp_u21_layering_10k_90pct_3d`: Finds an account that receives a large sum and quickly passes nearly all of it to other people.	Retire the rule	0 fewer alerts, 0 caught fraud cases lost, 0.00 USD saved (estimate)	high
SEPA transfers	Retire rule 10+ mid-size payments in 5 days, over 20,000 USD in total: 0.5% of its 1,042 alerts with a known outcome were fraud `tp_u21_stats_10tx_1k3k_5d`: Finds a burst of many similar mid-size payments that add up to a large total.	Retire the rule	1 fewer alerts, 0 caught fraud cases lost, 4.80 USD saved (estimate)	high
Mobile money	Retire rule Money from 5+ different senders into one account within 5 days (fan-in): 2.4% of its 28,140 alerts with a known outcome were fraud `tp_ffiec_fan_in_5_senders_5d`: Finds one account that collects money from many people, as a collection or mule account does.	Retire the rule	58 fewer alerts, 7 caught fraud cases lost, 244.80 USD saved (estimate)	medium
Mobile money	Retire rule Transfer above 500 USD: 11.8% of its 51,693 alerts with a known outcome were fraud `tp_u21_transfer_over_500`: Flags every transfer over a low fixed amount, so analysts see most mid-size transfers.	Retire the rule	869 fewer alerts, 145 caught fraud cases lost, 3,129.60 USD saved (estimate)	medium
Mobile money	Raise the review score from 1 to 2: 927 fewer alerts in the backtest	Retune the threshold	927 fewer alerts, 152 caught fraud cases lost, 3,374.40 USD saved (estimate)	medium

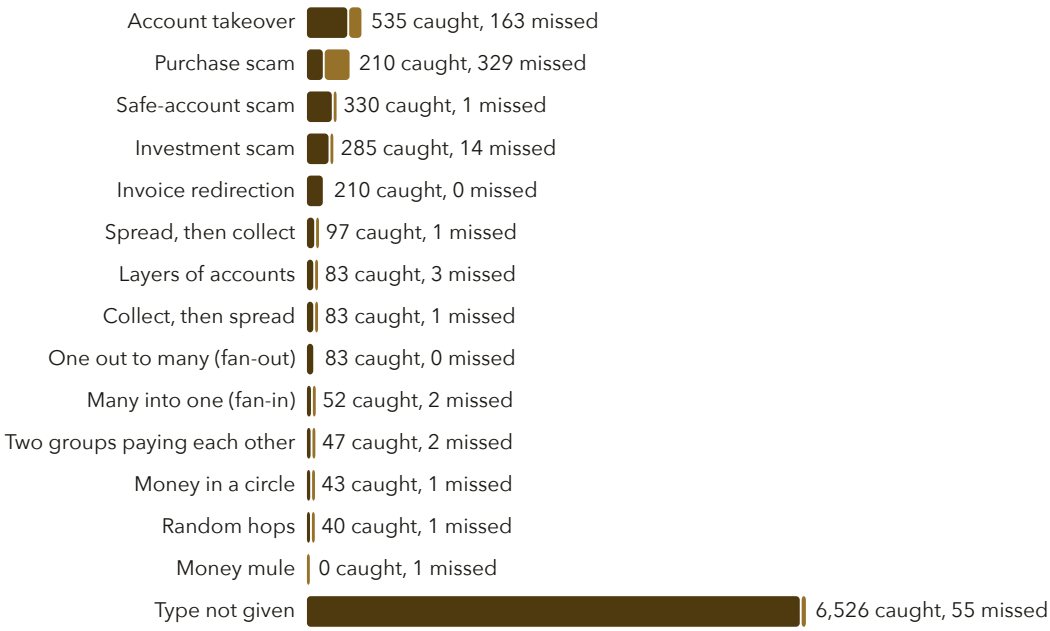
The top 3 actions of each line, from a backtest on that line's own period. Effects of different lines are not added: they come from different periods and rule sets.

What changed since the previous report

- Bank transfers: No previous report was given, so this report is treated as the first one. There is nothing to compare with yet. The next run can compare with this one.
- SEPA transfers: No previous report was given, so this report is treated as the first one. There is nothing to compare with yet. The next run can compare with this one.
- Mobile money: No previous report was given, so this report is treated as the first one. There is nothing to compare with yet. The next run can compare with this one.

Coverage by fraud type

Fraud types present in your labels



LABELLED FRAUD CASES PER TYPE. BLUE: A RULE FIRED ON THE PAYMENT. ORANGE: NO RULE FIRED. SOURCE: LABELS FILE AND RULE-HIT LOG, LABELS KNOWN BY THE CUT-OFF.

FRAUD TYPE	LABELLED CASES	CAUGHT	MISSED	WOWYRD
Account takeover	698	535	163	WoWyrd rule: planned
Purchase scam	539	210	329	WoWyrd rule: planned
Safe-account scam	331	330	1	WoWyrd rule: planned
Investment scam	299	285	14	WoWyrd rule: planned
Invoice redirection	210	210	0	WoWyrd rule: planned
Spread, then collect	98	97	1	WoWyrd rule available: Money leaves soon after it arrives
Layers of accounts	86	83	3	WoWyrd rule: planned
Collect, then spread	84	83	1	WoWyrd rule available: Money leaves soon after it arrives; Many small credits, then one large payout
One out to many (fan-out)	83	83	0	WoWyrd rule available: One account pays many different payees
Many into one (fan-in)	54	52	2	WoWyrd rule available: Many senders pay one account; One payee shared by several customers
Two groups paying each other	49	47	2	WoWyrd rule: planned
Money in a circle	44	43	1	WoWyrd rule: planned
Random hops	41	40	1	WoWyrd rule: planned
Money mule	1	0	1	WoWyrd rule: planned
Type not given	6,581	6,526	55	WoWyrd rule: planned

Not in this dataset, so it cannot be measured here

Your labels hold no case of these types, so this data cannot show whether your rules catch them. This is not a gap in your rules.

- **One user holds many more accounts or cards than similar users**
  WoWyrd rule: planned.
- **One type of operation makes up an unusual share of a user's activity**
  WoWyrd rule available: One type of operation dominates an account.

- **Many operations of one type in a short time, incoming or outgoing**
  WoWyrd rule available: Many requests from one account in an hour, then a payout; A burst of operations of one type.
- **Balance stays low although large amounts pass through**
  WoWyrd rule available: Large amounts pass through an account that keeps a low balance.
- **Large loans are taken and repaid again and again**
  WoWyrd rule available: Large loans taken and repaid again and again.
- **Gambling winnings arrive with no deposits, then card transfers follow**
  WoWyrd rule available: Gambling winnings with no gambling deposits.
- **Regular transfers to a personal account look like business activity**
  WoWyrd rule available: A personal account paid by many payers.
- **A new merchant's volume is far above similar merchants, then the merchant closes**
  WoWyrd rule available: A merchant with little history suddenly busy.
- **Merchant account inflows mirror its outflows (transit)**
  WoWyrd rule available: A business account pays out almost all it receives.
- **Payment purposes do not fit the merchant's category code**
  WoWyrd rule available: Payment purpose does not fit the merchant's business; Card payment to a person without category or purpose.
- **Contacts, device, apps, IMEI, operating system or network address change often**
  WoWyrd rule available: Payout right after an email or phone change; One session from several network addresses; One account used from many devices.
- **One device fingerprint is used by unrelated users**
  WoWyrd rule available: One device used by several customers.
- **Two operations are too far apart to travel between in the time**
  WoWyrd rule available: Locations too far apart for the time between them.
- **A new account gets large or many credits soon after opening**
  WoWyrd rule available: A new account receives a large credit; A new account paid by several people.
- **A dormant account suddenly moves large amounts**
  WoWyrd rule: planned.
- **Repeated amounts just under a reporting or limit threshold**
  WoWyrd rule available: Payments just under a limit; Many small payments from one account add up to a large sum; Many small payments to one payee add up to a large sum.
- **Repeated round amounts with no business reason**
  WoWyrd rule available: Several payments in large round amounts.
- **Outgoing payments per hour above the customer's usual level**
  WoWyrd rule available: More payments in an hour than the customer usually makes; Many requests from one account in an hour, then a payout.
- **A large first payment to a payee never paid before**
  WoWyrd rule available: A large payment to a payee added just before.
- **Many senders' accounts share one beneficiary**
  WoWyrd rule available: One payee shared by several customers.
- **An amount far above the customer's own history**
  WoWyrd rule available: A payment far above the customer's usual amount.
- **Credits from many different banks into one account**
  WoWyrd rule available: Credits from many different banks into one account.
- **Transfers to or from high-risk jurisdictions**
  WoWyrd rule available: A payment to or from a high-risk country.
- **Cash withdrawn right after a credit arrives**
  WoWyrd rule available: Cash taken out soon after money arrives.
- **The payee name does not match and the payment still goes**
  WoWyrd rule available: Paid although the payee name did not match.
- **The payment reference mentions investment, crypto or a 'safe account'**
  WoWyrd rule available: The payment reference uses common scam wording.
- **An older customer suddenly sends a large amount to a new payee**
  WoWyrd rule available: An older customer sends a large amount to a new payee.

- **Activity at hours unusual for the customer**
  WoWyrd rule available: Activity at an hour unusual for the customer.

Incoming payments and money-mule signs

Each business line is measured on its own files; each line's own report has the detail.

BUSINESS LINE	INCOMING CREDITS IN YOUR RULE LOG	A RULE FIRED ON THEM	ACCOUNTS WITH A MONEY-MULE SIGN	A RULE FIRED ON THEM
Bank transfers	Incoming payments not measured: your transactions file has no direction column (for example direction, with values such as in and out).	–	–	–
SEPA transfers	91.3%	0.0%	7	0
Mobile money	Incoming payments not measured: your transactions file has no direction column (for example direction, with values such as in and out).	–	–	–

New accounts and onboarding rating

Each business line is measured on its own files; each line's own report has the detail.

BUSINESS LINE	PAYMENTS FROM ACCOUNTS 30 DAYS OLD OR YOUNGER	ALERTS PER 1,000 OF THOSE PAYMENTS
SEPA transfers	41.9%	717.8

Requirements changed since the last review

Your rules are mapped to current requirements. We flag when a new requirement affects them. We follow official publications of regulators in Ukraine, the EU, the UK and the US.

> **Not legal advice. This report maps your rules to requirements, in our own short wording. It is not legal advice. You decide how you comply.**

Requirements library read on 2026-11-11. No change file was given for this run, so no changed requirement is listed here.

Regulatory checks by regulator

> **Not legal advice. This report maps your rules to requirements, in our own short wording. It is not legal advice. You decide how you comply.**

Regulatory statuses as of 2026-11-11 (library date). Check them again before you rely on this report.

Grouped by regulator. Our own short wording, not the regulator's text. Each line is checked on its own files; its own technical report gives the finding and the evidence.

Checks per NBU requirements

Rows citing the NBU draft of 17.07.2026 — draft, not in force: its text can change before adoption. Resolutions 51, 54 and 116 are in force. Bill 16013 is a Ukrainian bill, shown here with its status.

REQUIREMENT (OUR WORDING)	RESULT: BANK TRANSFERS	RESULT: SEPA TRANSFERS	RESULT: MOBILE MONEY	SOURCE STATUS	AS OF	OFFICIAL SOURCE
The acquirer passes payee (merchant) name and category code to the issuer. Check that these fields are filled in your data. Most time-relevant item: the deadline is about 20.11.2026.	Not measurable from these files	Not measurable from these files	Not measurable from these files	in force since 20.05.2026; 6 months to comply (about 20.11.2026)	2026-11-11	bank.gov.ua
Review every rule at least monthly by back-testing it.	Gap	Partly met	Gap	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Metric 1: compare how often each rule fired with how many payments were actually stopped.	Partly met	Partly met	Gap	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Metric 2: share of fraud value that was prevented, out of all fraud value.	Partly met	Partly met	Gap	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Set rule-effectiveness thresholds in writing. A rule under its threshold gets an immediate review.	Gap	Gap	Gap	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Record a review decision for every rule: keep, adjust or cancel.	Partly met	Partly met	Partly met	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Have evidence ready for a supervisor: documents, rules, risk markers.	Partly met	Partly met	Partly met	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Show the acquirer's full name before an online payment; receipts show payee, commission, purpose and category code.	Not measurable from these files	Not measurable from these files	Not measurable from these files	in force since 20.05.2026; 6 months to comply (about 20.11.2026)	2026-11-11	bank.gov.ua
Reconcile payment operations every day.	Partly met	Partly met	Partly met	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
Acquiring for natural persons only for allowed categories, with the required data passed to the issuer.	Not measurable from these files	Not measurable from these files	Not measurable from these files	in force since 20.05.2026; 6 months to comply (about 20.11.2026)	2026-11-11	bank.gov.ua
Non-bank providers that acquire payments need an authorisation; the sanctions pause has ended.	Not measurable from these files	Not measurable from these files	Not measurable from these files	in force; grace period ended 02.09.2026	2026-11-11	bank.gov.ua

REQUIREMENT (OUR WORDING)	RESULT: BANK TRANSFERS	RESULT: SEPA TRANSFERS	RESULT: MOBILE MONEY	SOURCE STATUS	AS OF	OFFICIAL SOURCE
Remote verification of natural persons uses the updated procedure with credit-bureau data.	Not measurable from these files	Not measurable from these files	Not measurable from these files	in force since 10.10.2026; 3 months to align internal procedures (about 10.01.2027)	2026-11-11	bank.gov.ua
Reports to the State Financial Monitoring Service go only through the e-cabinet, with numbered registers.	Not measurable from these files	Not measurable from these files	Not measurable from these files	in force since 10.10.2026; 3 months to align internal procedures (about 10.01.2027)	2026-11-11	bank.gov.ua
Passing cards, account access or payment data to fraudsters becomes a crime. Detect and restrict accounts used as drops.	Not measurable from these files	Not measurable from these files	Not measurable from these files	adopted by the Rada 28.10.2026; presidential signature not confirmed	2026-11-11	itd.rada.gov.ua

Checks per EU requirements

REQUIREMENT (OUR WORDING)	RESULT: BANK TRANSFERS	RESULT: SEPA TRANSFERS	RESULT: MOBILE MONEY	SOURCE STATUS	AS OF	OFFICIAL SOURCE
When a payee name check fails because of the payee's provider, that provider compensates the payer's provider. Keep evidence of the name check on received transfers.	Not measurable from these files	Not measurable from these files	Not measurable from these files	agreed, not adopted (EU Payment Services Regulation; adoption expected by 12.2026)	2026-11-11	oeil.europarl.europa.eu

Checks per UK requirements

REQUIREMENT (OUR WORDING)	RESULT: BANK TRANSFERS	RESULT: SEPA TRANSFERS	RESULT: MOBILE MONEY	SOURCE STATUS	AS OF	OFFICIAL SOURCE
A claim may carry an excess of up to 100 GBP, never for vulnerable customers.	Not measurable from these files	Not measurable from these files	Not measurable from these files	in force	2026-11-11	psr.org.uk
Test and review rules; a poorly calibrated rule set the firm cannot explain is poor practice.	Partly met	Partly met	Partly met	guidance in force	2026-11-11	fca.org.uk

Checks per US requirements (FinCEN, NYDFS, FFIEC, Nacha, Federal Reserve)

FinCEN and Nacha items are not checked from your files in this run; the rows below are NYDFS and FFIEC items.

REQUIREMENT (OUR WORDING)	RESULT: BANK TRANSFERS	RESULT: SEPA TRANSFERS	RESULT: MOBILE MONEY	SOURCE STATUS	AS OF	OFFICIAL SOURCE
Analyse scenarios, rules and thresholds on an ongoing basis.	Partly met	Partly met	Partly met	in force	2026-11-11	dfs.ny.gov
Test rules before and after they go live.	Not measurable from these files	Not measurable from these files	Not measurable from these files	in force	2026-11-11	dfs.ny.gov
Tune and validate monitoring; justify each threshold.	Partly met	Partly met	Partly met	guidance	2026-11-11	bsaaml.ffiec.gov

The summary file stays per business line: each line's folder holds its own summary.json, made by the same code with the same suppression as a single run. No combined summary is written.

Fraud types in plain words

Each fraud type named in your labels, in one sentence. The word in small grey text is the label as your file gives it.

Account takeover `ATO`	A criminal gets into a customer's account and sends money out of it.
Collect, then spread `GATHER-SCATTER`	Money from many accounts is collected in one, then sent on to many others.
Investment scam `INVEST`	The customer is talked into paying into an investment that does not exist.
Invoice redirection `INVOICE`	A false or changed invoice makes the customer pay a criminal instead of the real supplier.
Layers of accounts `STACK`	Money passes through several layers of accounts in a row, so its origin is hard to trace.

Many into one (fan-in) `FAN-IN`	Many accounts send money into one account, which collects it.
Money in a circle `CYCLE`	Money passes along a chain of accounts and comes back to the account it left.
Money mule `MULE`	An account receives stolen money and passes it on for someone else.
One out to many (fan-out) `FAN-OUT`	One account sends money out to many accounts, so it spreads thin.
Purchase scam `PURCHASE`	The customer pays for goods or services that never arrive.
Random hops `RANDOM`	Money hops between accounts along an irregular path with no fixed shape.
Safe-account scam `SAFE`	A caller who poses as the bank tells the customer to move money to an account the caller controls.
Spread, then collect `SCATTER-GATHER`	Money is split across many accounts, then collected again in one account.
Two groups paying each other `BIPARTITE`	One group of accounts pays a second group, with many payments crossing between them.
Type not given `no type`	Fraud labels in your file that do not say which kind of fraud it was.