

# Session K2M-3107

| Final Status | Risk Tier | Gates Passed | Four-Eyes | Appeal Outcome |
|--------------|-----------|--------------|-----------|----------------|
| Rejected     | High      | 10 of 11     | Completed | Upheld         |

## PART A

K2M-3107

## OUTCOME IN BRIEF

Sanctions screening (K2M): clear

AS READ FROM THE DOCUMENT

**MACHINE-READABLE ZONE (TD1)**

## CONSENT RECORD

|                                            |                                                                                             |
|--------------------------------------------|---------------------------------------------------------------------------------------------|
| Recorded                                   | 22 Sep 2026 · 09:12:31 EAT                                                                  |
| Consented to                               | Biometric processing · data retention<br>· third-party verification · identity verification |
| Consent recorded before any biometric step | YES                                                                                         |

# Checks

WHAT K2M MEASURED

| DOCUMENT                                        |           |        | FACE MATCH AND ACTIVE LIVENESS                                                                                                                                                                                      |       |            |
|-------------------------------------------------|-----------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|------------|
| CHECK                                           | OBSERVED  | RESULT | CHECK                                                                                                                                                                                                               | SCORE | RESULT     |
| Image quality<br>Gate 0.70 · minimum 0.30       | 0.88      | PASS   | Face match similarity<br>Minimum 0.40, fixed in code                                                                                                                                                                | 0.86  | PASS       |
| OCR confidence<br>Gate 0.80 · lowest field 0.92 | 0.94      | PASS   | Turn head left                                                                                                                                                                                                      | 0.93  | PASSED     |
| MRZ check digits<br>ICAO 7-3-1, recalculated    | 4 of 4    | PASS   | Turn head right                                                                                                                                                                                                     | 0.90  | PASSED     |
| Barcode ↔ OCR<br>Barcode vs printed fields      | All match | PASS   | Smile<br>No expression change registered                                                                                                                                                                            | 0.22  | NOT PASSED |
|                                                 |           |        | <div><div>0.21</div><div>Liveness confidence</div><div>Minimum 0.30, fixed in code · by design, the pillar scores 0 below it</div><div><div></div><div>0.00</div><div>minimum 0.30</div><div>1.00</div></div></div> |       |            |

|                                                                                         |                                                                                     |                                                                                                         |
|-----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| PHONE OTP<br><b>Verified · 09:15:30</b><br>1 attempt · must be verified (fixed in code) | DUPLICATE DOCUMENT IMAGE<br><b>No match found</b><br>Compared with earlier sessions | SCREENING (K2M)<br><b>Sanctions lists: clear</b><br>Adverse media by design; current lists: UN and OFAC |
|-----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|

# Gate evaluation

DETERMINISTIC · FIXED ORDER · INFORMS THE REVIEWER

| #  | GATE                                     | THRESHOLD           | SET BY        | OBSERVED       | RESULT |
|----|------------------------------------------|---------------------|---------------|----------------|--------|
| 01 | Consent recorded                         | Required            | Review check  | 09:12:31       | PASS   |
| 02 | Image quality minimum (not yet enforced) | ⚠ ≥ 0.30            | Fixed in code | 0.88           | PASS   |
| 03 | Image-quality gate                       | ≥ 0.70              | Configurable  | 0.88           | PASS   |
| 04 | OCR confidence                           | ≥ 0.80              | Configurable  | 0.94           | PASS   |
| 05 | MRZ check digits                         | On · 4 of 4 valid   | Configurable  | 4 of 4 valid   | PASS   |
| 06 | Barcode ↔ OCR consistency                | All fields match    | Review check  | All match      | PASS   |
| 07 | Face match similarity                    | ⚠ ≥ 0.40            | Fixed in code | 0.86           | PASS   |
| 08 | Liveness confidence                      | ⚠ ≥ 0.30            | Fixed in code | 0.21           | FAIL   |
| 09 | Phone OTP                                | ⚠ Verified          | Fixed in code | Verified       | PASS   |
| 10 | Duplicate document image                 | No unresolved match | Review check  | No match found | PASS   |
| 11 | PEP & watchlist screening (K2M)          | Clear               | Review check  | Clear          | PASS   |

!

**10 of 11 gates passed; liveness is below its minimum. The results went to human review, where the reviewers decided.** Fixed in code (no configuration can change them): face match 0.40, liveness 0.30, image quality 0.30, OTP verified. Configurable by an administrator: OCR 0.80, image-quality gate 0.70, MRZ check on/off.

# Review & four-eyes

HUMAN DECISION

Rule applied: on a high-risk session (assurance tier 3 or above, or risk score above 80), any decision, approve or reject, needs a second, different reviewer. One reviewer cannot give both approvals; by design, a disagreement is escalated to a KYC administrator.

01

RA

Reviewer A · first review

Rejected

22 Sep 2026 · 10:40:00

Smile challenge not passed and liveness confidence 0.21 is below the 0.30 minimum fixed in code.  
Document checks and face match pass, but liveness cannot be established for this capture.

02

K2M

K2M · four-eyes required

22 Sep 2026 · 10:40:25

High-risk session. Held as "awaiting second reviewer"; Reviewer A cannot give the second approval.

03

RB

Reviewer B · second review

Rejection confirmed

22 Sep 2026 · 10:40:50

Second review: I agree. Liveness confidence is below the minimum fixed in code, and the reason for the decision is recorded clearly.

# Appeal

ON THE REJECTED SESSION

An appeal is opened on the rejected session, one at a time. It is decided by a compliance officer or KYC administrator, not the reviewer who recorded the rejection (here, Reviewer B). The outcome is recorded; the session status is unchanged.

01

AP

Appeal request · opened on the rejected session

22 Sep 2026 · 10:41:15

Reason given: "I did smile when asked, but my phone camera froze for a moment. Please look at my application again."

02

CC

Compliance officer C · appeal decision

Upheld

22 Sep 2026 · 10:41:40

The smile challenge did not register in the recorded capture and liveness confidence (0.21) is below the 0.30 minimum fixed in code. Rejection upheld; the applicant has been told they can start a new verification session.

# Decision path

FROM CAPTURE TO FINAL STATUS

| STAGE           | OUTCOME                                  | BY                   | TIME (EAT)          |
|-----------------|------------------------------------------|----------------------|---------------------|
| Capture         | Intro, consent, document, selfie, review | Applicant            | 09:12:04 – 09:15:34 |
| Gate evaluation | 10 of 11 passed · results to reviewer    | K2M                  | 09:15:35            |
| First review    | Rejected                                 | Reviewer A           | 10:40:00            |
| Four-eyes       | Rejection confirmed                      | Reviewer B           | 10:40:50            |
| Appeal          | Upheld · session status unchanged        | Compliance officer C | 10:41:40            |

# Audit timeline

16 EVENTS · OLDEST FIRST · EAT (UTC+3)

| TIME     | ACTOR                | EVENT / DETAIL                                                                                                                                |
|----------|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| 09:12:04 | Applicant            | Session created · Standard KYC policy · verification link opened on mobile                                                                    |
| 09:12:31 | Applicant            | Consent granted · Consent recorded before any biometric step                                                                                  |
| 09:13:40 | Applicant            | Document step completed · National ID (specimen) · front and back captured                                                                    |
| 09:13:44 | K2M                  | Document checks completed · Quality 0.88 · OCR 0.94 · MRZ 4/4 · barcode match                                                                 |
| 09:14:52 | Applicant            | Selfie step completed · 3 active liveness challenges · 1 not passed (smile)                                                                   |
| 09:14:55 | K2M                  | Face match and liveness scored · Face match 0.86 · liveness 0.21, below the 0.30 minimum fixed in code · liveness pillar scored 0 (by design) |
| 09:15:30 | Applicant            | Phone OTP verified · +254 7•• ••• 207 · 1 attempt                                                                                             |
| 09:15:33 | K2M                  | Screening completed · PEP, watchlist and adverse-media screening (as designed): clear                                                         |
| 09:15:34 | Applicant            | Review step completed · Applicant confirmed details and submitted                                                                             |
| 09:15:35 | K2M                  | Gates evaluated · 10 of 11 gates passed · results passed to the reviewer                                                                      |
| 09:15:35 | K2M                  | Routed to human review · High-risk session · any decision will need a second reviewer                                                         |
| 10:40:00 | Reviewer A           | Rejection recorded (first review) · Liveness 0.21 below the 0.30 minimum fixed in code; smile challenge not passed                            |
| 10:40:25 | K2M                  | Four-eyes required · High-risk session · any decision needs a second, different reviewer                                                      |
| 10:40:50 | Reviewer B           | Rejection confirmed (four-eyes) · Second reviewer agrees; session rejected                                                                    |
| 10:41:15 | Appeal request       | Appeal opened on the rejected session · Reason: camera freeze during the smile challenge                                                      |
| 10:41:40 | Compliance officer C | Appeal decided: UPHELD · Outcome and note recorded; session status unchanged                                                                  |

## About this report

HOW TO READ IT

- Deterministic gates that inform the reviewer.** Every session on a policy is evaluated against the same gates, in the same order. Some minimums are fixed in code; other thresholds are configurable by an administrator. The gates score the capture; the table on page 2 shows what the reviewers saw.
- Reviewers decide.** Reviewer decisions, the four-eyes confirmation and the appeal outcome each carry a required note, the person and the time.
- Screening is K2M's own.** K2M's screening services are designed to run PEP, watchlist and adverse-media screening; the current release screens against UN and OFAC lists.
- Intended design.** K2M is pre-release. This is the designed report format; the current release does not yet generate it, and some behaviour shown here (including KYC-administrator escalation, applicant-initiated appeals, adverse-media screening and pillar scoring) is not yet in the current release.
- Synthetic sample.** Brian Sample, account U-6093, document SPEC-00207 and every other record here are fictitious, generated to demonstrate Saolix K2M.