|  |  |  |  |
| --- | --- | --- | --- |
| Segment ID | Segment status | Source segment | Target segment |
| 164b406e2-e712-4e67-919e-17c115b4b6b4 | Not Translated (0%) | CGSS | CGSS |
| 2a7becb23-b367-4b7e-bd5e-cb87402aef9d | Not Translated (0%) | CGSS | CGSS |
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| 9070734c56-0ba4-4583-9643-c1eee9cdb55f | Not Translated (0%) | Preface | Preface |
| 91ca738131-c870-46ef-bc2f-d6d3470f74cf | Not Translated (0%) | It seems a vast understatement to say that, over the last decade, complying with global sanctions has become more complex. | It seems a vast understatement to say that, over the last decade, complying with global sanctions has become more complex. |
| 9235b523a9-0a9d-446a-8f0d-bf6410335f77 | Not Translated (0%) | Trends over the last decade include: | Trends over the last decade include: |
| 9307404a9c-efcc-4baf-a60a-e470c632e4aa | Not Translated (0%) | More sanctions regimes | More sanctions regimes |
| 9468ab5c2a-0962-4989-833f-6f89d5122567 | Not Translated (0%) | “Smarter”—meaning more targeted—sanctions, requiring greater precision and nuance to comply | “Smarter”—meaning more targeted—sanctions, requiring greater precision and nuance to comply |
| 9552d57cc1-7af9-4cf8-963e-baa13dd80a0a | Not Translated (0%) | Increased regulator expectations and fines for violating sanctions restrictions | Increased regulator expectations and fines for violating sanctions restrictions |
| 96a284fbc5-8a8b-442b-8ae7-b5aa668897d2 | Not Translated (0%) | Increased guidance from governmental and non-governmental bodies and more “lessons learned” from enforcement actions. | Increased guidance from governmental and non-governmental bodies and more “lessons learned” from enforcement actions. |
| 9729c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | The increased risk associated with sanctions violations has necessitated the development of a profession of sanctions specialists, those well versed in the policies, laws, regulations, guidance, procedures, technologies, intricate nuances, and even sometimes flat-out contradictions associated with complying with sanctions. | The increased risk associated with sanctions violations has necessitated the development of a profession of sanctions specialists, those well versed in the policies, laws, regulations, guidance, procedures, technologies, intricate nuances, and even sometimes flat-out contradictions associated with complying with sanctions. |
| 9829c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | The Certified Global Sanctions Specialist (CGSS) program is designed to help advance sanctions compliance as a profession deserving of greater recognition. | The Certified Global Sanctions Specialist (CGSS) program is designed to help advance sanctions compliance as a profession deserving of greater recognition. |
| 9929c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | Much as the CAMS program did for anti-money laundering, CGSS seeks to define the body of knowledge underlying sanctions compliance, with a focus on the concepts, legal frameworks, regulator expectations, and established best practices. | Much as the CAMS program did for anti-money laundering, CGSS seeks to define the body of knowledge underlying sanctions compliance, with a focus on the concepts, legal frameworks, regulator expectations, and established best practices. |
| 10029c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | In developing this program, we needed to make a few key decisions about approaching this complex field. | In developing this program, we needed to make a few key decisions about approaching this complex field. |
| 10129c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | First, due to the changing nature of specific restrictive measures, the CGSS Study Guide and exam do not attempt to teach and test knowledge associated with the current state of individual sanctions, regimes. | First, due to the changing nature of specific restrictive measures, the CGSS Study Guide and exam do not attempt to teach and test knowledge associated with the current state of individual sanctions, regimes. |
| 10229c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | Instead, specifics of past and present regimes are used as examples or case studies to demonstrate core concepts, frameworks, best practices, etc. Perhaps the best example is the JCPOA. | Instead, specifics of past and present regimes are used as examples or case studies to demonstrate core concepts, frameworks, best practices, etc. Perhaps the best example is the JCPOA. |
| 10329c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | The state of Iranian sanctions at the moment of this writing will almost certainly be different than the moment when you are reading it. | The state of Iranian sanctions at the moment of this writing will almost certainly be different than the moment when you are reading it. |
| 10429c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | That is the nature of geo-politics and thus the nature of sanctions. | That is the nature of geo-politics and thus the nature of sanctions. |
| 10529c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | To ensure currency of the Study Guide and exam, CGSS focuses on the enduring, underlying concepts that will help those working in the profession understand and interpret different and changing sanctions regimes. | To ensure currency of the Study Guide and exam, CGSS focuses on the enduring, underlying concepts that will help those working in the profession understand and interpret different and changing sanctions regimes. |
| 10629c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | Second, we sought to create a program that took the perspective of a global sanctions specialist, someone working for a global organization who needed to think about multiple jurisdictions. | Second, we sought to create a program that took the perspective of a global sanctions specialist, someone working for a global organization who needed to think about multiple jurisdictions. |
| 10729c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | That led to an obvious focus on United Nations sanctions, which are implemented by individual Member States. | That led to an obvious focus on United Nations sanctions, which are implemented by individual Member States. |
| 10829c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | In addition to the UN, however, we also confronted the fact that the United States and the European Union pass most of the autonomous sanctions laws, and these laws can have a global impact on compliance. | In addition to the UN, however, we also confronted the fact that the United States and the European Union pass most of the autonomous sanctions laws, and these laws can have a global impact on compliance. |
| 10929c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | You will therefore see a significant amount of content about how OFAC and EU Member State agencies implement and enforce sanctions. | You will therefore see a significant amount of content about how OFAC and EU Member State agencies implement and enforce sanctions. |
| 11029c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | We have also included information on many of the largest jurisdictions, in particular whether they impose autonomous sanctions, as well as what agencies enforce sanctions and handle license requests. | We have also included information on many of the largest jurisdictions, in particular whether they impose autonomous sanctions, as well as what agencies enforce sanctions and handle license requests. |
| 11129c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | However, the emphasis on US and EU regulations is a reflection of the current global sanctions compliance landscape. | However, the emphasis on US and EU regulations is a reflection of the current global sanctions compliance landscape. |
| 11229c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | Finally, another important concern has been the audience for CGSS. | Finally, another important concern has been the audience for CGSS. |
| 11329c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | Due to our early focus on the protections of the financial system through the prevention of money laundering, ACAMS has a history of serving financial institutions as well as related entities such as money service businesses. | Due to our early focus on the protections of the financial system through the prevention of money laundering, ACAMS has a history of serving financial institutions as well as related entities such as money service businesses. |
| 11429c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | Sanctions compliance, however, applies well beyond financial institutions. | Sanctions compliance, however, applies well beyond financial institutions. |
| 11529c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | In fact, most fines levied by OFAC in the last several years have targeted manufacturing and shipping companies. | In fact, most fines levied by OFAC in the last several years have targeted manufacturing and shipping companies. |
| 11629c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | With the help of a diverse task force, we have worked hard to address concepts related to non-financial institutions without diluting a focus on the needs of ACAMS’ existing constituency. | With the help of a diverse task force, we have worked hard to address concepts related to non-financial institutions without diluting a focus on the needs of ACAMS’ existing constituency. |
| 11729c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | Sanctions due diligence for a bank and a manufacturing company may look different in detail, but the core concepts remain the same. | Sanctions due diligence for a bank and a manufacturing company may look different in detail, but the core concepts remain the same. |
| 11829c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | We look forward to your feedback on whether we have captured the right balance on all the choices we have made. | We look forward to your feedback on whether we have captured the right balance on all the choices we have made. |
| 11929c07f10-4110-4997-aba2-003276c4c51c | Not Translated (0%) | Please contact us at https://www.acams.org/contact/. | Please contact us at https://www.acams.org/contact/. |
| 12089447435-5593-4d7e-ac3e-15425ee32096 | Not Translated (0%) | About ACAMS | About ACAMS |
| 121e983fb7e-7655-432a-ba5b-46c7665fbc32 | Not Translated (0%) | The mission of ACAMS is to advance the professional knowledge, skills, and experience of those dedicated to the detection and prevention of money laundering around the world, and to promote the development and implementation of sound anti-money laundering (AML) policies and procedures. | The mission of ACAMS is to advance the professional knowledge, skills, and experience of those dedicated to the detection and prevention of money laundering around the world, and to promote the development and implementation of sound anti-money laundering (AML) policies and procedures. |
| 122e983fb7e-7655-432a-ba5b-46c7665fbc32 | Not Translated (0%) | ACAMS achieves its mission through: | ACAMS achieves its mission through: |
| 1239ed096f0-f8a8-4ae8-8db8-0a23b4ec8dcc | Not Translated (0%) | Promoting international standards for the detection and prevention of money laundering and terrorist financing. | Promoting international standards for the detection and prevention of money laundering and terrorist financing. |
| 124fa372174-c521-46c7-bad6-923e1caf6c04 | Not Translated (0%) | Educating professionals in private and government organizations about these standards and the strategies and practices required to meet them. | Educating professionals in private and government organizations about these standards and the strategies and practices required to meet them. |
| 125bd717ee7-8798-459c-bd14-b2f1b17726df | Not Translated (0%) | Certifying the achievements of its members. | Certifying the achievements of its members. |
| 126838320d2-48b8-4cce-ae9a-9b220d42d79e | Not Translated (0%) | Providing networking platforms through which AML/CFT professionals can collaborate with their peers throughout the world. | Providing networking platforms through which AML/CFT professionals can collaborate with their peers throughout the world. |
| 1276558bd6b-deb6-48a5-a50c-489dd289151f | Not Translated (0%) | ACAMS sets professional standards for anti-financial crime practitioners worldwide and offers them career development and networking opportunities. | ACAMS sets professional standards for anti-financial crime practitioners worldwide and offers them career development and networking opportunities. |
| 1286558bd6b-deb6-48a5-a50c-489dd289151f | Not Translated (0%) | In particular, ACAMS seeks to: | In particular, ACAMS seeks to: |
| 1299ee03d5e-3fce-49a5-ba82-f4236bfc2e7c | Not Translated (0%) | Help AML professionals with career enhancement through cutting-edge education, certification, and training. | Help AML professionals with career enhancement through cutting-edge education, certification, and training. |
| 1309ee03d5e-3fce-49a5-ba82-f4236bfc2e7c | Not Translated (0%) | ACAMS acts as a forum where professionals can exchange strategies and ideas. | ACAMS acts as a forum where professionals can exchange strategies and ideas. |
| 13108b06807-019d-4bf4-bfbe-5a402a5ffea1 | Not Translated (0%) | Assist practitioners in developing, implementing, and upholding proven, sound AML practices and procedures. | Assist practitioners in developing, implementing, and upholding proven, sound AML practices and procedures. |
| 1322b38e088-4777-4aed-a19c-6b13f01cf520 | Not Translated (0%) | Help financial and nonfinancial institutions identify and locate individuals with the Certified Anti-Money Laundering (CAMS) designation in the rapidly expanding AML field. | Help financial and nonfinancial institutions identify and locate individuals with the Certified Anti-Money Laundering (CAMS) designation in the rapidly expanding AML field. |
| 13384bed8d1-4797-4292-9fe8-2e5b2debe076 | Not Translated (0%) | Introduction and Study Recommendations | Introduction and Study Recommendations |
| 134bedae335-ddf9-44c6-8082-bb9626a9a5f2 | Not Translated (0%) | Welcome to the Study Guide for the Certified Global Sanctions Specialist (CGSS) program. | Welcome to the Study Guide for the Certified Global Sanctions Specialist (CGSS) program. |
| 135bedae335-ddf9-44c6-8082-bb9626a9a5f2 | Not Translated (0%) | If you are already CAMS-certified, welcome back! | If you are already CAMS-certified, welcome back! |
| 136bedae335-ddf9-44c6-8082-bb9626a9a5f2 | Not Translated (0%) | If you are new to ACAMS, we welcome you to the largest international community of AML and financial crime professionals. | If you are new to ACAMS, we welcome you to the largest international community of AML and financial crime professionals. |
| 137266b0ff5-d0cb-4b1a-8427-8b98eb08d0be | Not Translated (0%) | This Study Guide has been created to help people like you prepare for the CGSS exam. | This Study Guide has been created to help people like you prepare for the CGSS exam. |
| 138266b0ff5-d0cb-4b1a-8427-8b98eb08d0be | Not Translated (0%) | The Study Guide is intended to be the most comprehensive source of information for the CGSS exam. | The Study Guide is intended to be the most comprehensive source of information for the CGSS exam. |
| 139266b0ff5-d0cb-4b1a-8427-8b98eb08d0be | Not Translated (0%) | However, ACAMS also offers instructor-led exam preparation programs, including a Virtual Classroom course and a one-day Sanctions Exam Prep. | However, ACAMS also offers instructor-led exam preparation programs, including a Virtual Classroom course and a one-day Sanctions Exam Prep. |
| 140266b0ff5-d0cb-4b1a-8427-8b98eb08d0be | Not Translated (0%) | Please see our website for information on these programs as well as upcoming dates. | Please see our website for information on these programs as well as upcoming dates. |
| 14115bbe4db-7af6-4be9-af72-99df89b514e6 | Not Translated (0%) | This Study Guide is divided into eight chapters. | This Study Guide is divided into eight chapters. |
| 14215bbe4db-7af6-4be9-af72-99df89b514e6 | Not Translated (0%) | The first five of the chapters match the content domains of the CGSS exam blueprint, which is published in the CGSS Candidate Handbook, also available on the ACAMS website. | The first five of the chapters match the content domains of the CGSS exam blueprint, which is published in the CGSS Candidate Handbook, also available on the ACAMS website. |
| 143fb02d96c-61b4-4cfe-ae55-6b45316adc86 | Not Translated (0%) | Governance and Enforcement | Governance and Enforcement |
| 1442a6ef793-ed76-4353-aefd-c68a90976d1b | Not Translated (0%) | Sanctions Evasion Techniques | Sanctions Evasion Techniques |
| 145e9d97b6d-19eb-421e-a2a3-f61aadcc3a74 | Not Translated (0%) | Sanctions Due Diligence | Sanctions Due Diligence |
| 14672ecfe57-dfe1-4850-9469-7a2bc8eabb57 | Not Translated (0%) | Sanctions Screening | Sanctions Screening |
| 1475fd89d4f-f1cc-4c94-9a23-852c85cafdb3 | Not Translated (0%) | Sanctions Investigations and Assets Freezing | Sanctions Investigations and Assets Freezing |
| 148a129f360-2b92-450d-905c-08ca55142907 | Not Translated (0%) | Course Review | Course Review |
| 149907bc83e-fe2a-4522-bcae-3ae78bde6854 | Not Translated (0%) | It is important to retrieve information as you learn it, so we consider these review questions to be an essential learning tool. | It is important to retrieve information as you learn it, so we consider these review questions to be an essential learning tool. |
| 150907bc83e-fe2a-4522-bcae-3ae78bde6854 | Not Translated (0%) | However, please note that these review questions were not written by the same experts as the exam questions and are not designed to match the actual CGSS exam questions in style or difficulty. | However, please note that these review questions were not written by the same experts as the exam questions and are not designed to match the actual CGSS exam questions in style or difficulty. |
| 1511517ef9d-a228-450a-9a1c-8f65394830e2 | Not Translated (0%) | Appendices: | Appendices: |
| 1521517ef9d-a228-450a-9a1c-8f65394830e2 | Not Translated (0%) | Guidance Documents and Reference Material | Guidance Documents and Reference Material |
| 1534ee41ff7-8155-43bb-86ac-623ebe5f3ffc | Not Translated (0%) | Please examine this list carefully and spend time accessing and studying the sources referenced. | Please examine this list carefully and spend time accessing and studying the sources referenced. |
| 1544ee41ff7-8155-43bb-86ac-623ebe5f3ffc | Not Translated (0%) | Both the Study Guide and the source document reference list are sources for exam questions, so you should expect questions on the exam that are not specifically covered in the first five chapters. | Both the Study Guide and the source document reference list are sources for exam questions, so you should expect questions on the exam that are not specifically covered in the first five chapters. |
| 155d6834ca5-d680-482a-8f73-e626048d170c | Not Translated (0%) | Glossary | Glossary |
| 156ecf29c8e-659b-45b5-96a8-a06c8aef969c | Not Translated (0%) | Recommendations for Studying for the Exam | Recommendations for Studying for the Exam |
| 157f6b23352-3735-40b1-ad66-605d59117200 | Not Translated (0%) | Set a timeline for taking the exam. | Set a timeline for taking the exam. |
| 158f6b23352-3735-40b1-ad66-605d59117200 | Not Translated (0%) | Set clear, attainable study goals, and stick to your schedule. | Set clear, attainable study goals, and stick to your schedule. |
| 1592a418c30-2f36-4a73-a129-dc31857dc17e | Not Translated (0%) | When experiencing a desire to procrastinate, commit to working for a minimum of 25 minutes before deciding to change your schedule. | When experiencing a desire to procrastinate, commit to working for a minimum of 25 minutes before deciding to change your schedule. |
| 1602a418c30-2f36-4a73-a129-dc31857dc17e | Not Translated (0%) | That amount of time will often be sufficient to get over the initial hurdles of focusing your mind on the task and gaining needed study momentum. | That amount of time will often be sufficient to get over the initial hurdles of focusing your mind on the task and gaining needed study momentum. |
| 1615ba195ed-5ea3-40d4-b41a-d0a83d103522 | Not Translated (0%) | Recent research suggests that “interleaving”—or studying a mix of subjects rather than only one at a single sitting—can maintain interest and improve learning over time. | Recent research suggests that “interleaving”—or studying a mix of subjects rather than only one at a single sitting—can maintain interest and improve learning over time. |
| 1625ba195ed-5ea3-40d4-b41a-d0a83d103522 | Not Translated (0%) | If you find your attention on a subject lagging, it may help to move to a different part of the Study Guide, or to examine and study some of the reference documents listed in Chapter 8. | If you find your attention on a subject lagging, it may help to move to a different part of the Study Guide, or to examine and study some of the reference documents listed in Chapter 8. |
| 163ff9d3f33-eb82-4aeb-bca9-fb68fd00d740 | Not Translated (0%) | Test yourself. | Test yourself. |
| 164ff9d3f33-eb82-4aeb-bca9-fb68fd00d740 | Not Translated (0%) | The educational research on this is very clear: you are more likely to remember information longer if you test yourself rather than just re-read information. | The educational research on this is very clear: you are more likely to remember information longer if you test yourself rather than just re-read information. |
| 165ff9d3f33-eb82-4aeb-bca9-fb68fd00d740 | Not Translated (0%) | The key is to practice retrieving the information and getting feedback on how well you remember or understand it. | The key is to practice retrieving the information and getting feedback on how well you remember or understand it. |
| 166ff9d3f33-eb82-4aeb-bca9-fb68fd00d740 | Not Translated (0%) | Use the review questions in the Study Guide, as well as the Flash Cards available on our Learning Management System, to help you do this. | Use the review questions in the Study Guide, as well as the Flash Cards available on our Learning Management System, to help you do this. |
| 167ff9d3f33-eb82-4aeb-bca9-fb68fd00d740 | Not Translated (0%) | Even without these study aids, practice recalling information soon after studying, including the next day. | Even without these study aids, practice recalling information soon after studying, including the next day. |
| 16880d97668-e0f5-4bbb-bced-0ea251ceae5f | Not Translated (0%) | Form a study group. | Form a study group. |
| 16980d97668-e0f5-4bbb-bced-0ea251ceae5f | Not Translated (0%) | Find another individual or group also preparing for the CGSS exam. | Find another individual or group also preparing for the CGSS exam. |
| 17080d97668-e0f5-4bbb-bced-0ea251ceae5f | Not Translated (0%) | Study groups can take many forms, from simply discussing progress to quizzing each other to helping each other understand complex topics. | Study groups can take many forms, from simply discussing progress to quizzing each other to helping each other understand complex topics. |
| 17180d97668-e0f5-4bbb-bced-0ea251ceae5f | Not Translated (0%) | The format—in-person meetings, live online, or simply occasional texts or emails—is not nearly as important as the motivation that others working towards the same goal can provide. | The format—in-person meetings, live online, or simply occasional texts or emails—is not nearly as important as the motivation that others working towards the same goal can provide. |
| 172d84a499f-6c6b-476a-b42d-551d3b3d99a7 | Not Translated (0%) | Governance and Enforcement | Governance and Enforcement |
| 1736fd95212-067c-4dbd-a7af-04066f8b5309 | Not Translated (0%) | Governance and Enforcement | Governance and Enforcement |
| 17404a7da23-0fe6-427a-9f0d-b5357b3ccd90 | Not Translated (0%) | Introduction | Introduction |
| 1756876bc5f-272e-40d1-af52-f8c6ffadd052 | Not Translated (0%) | Laws, regulations, interpretive notes, guidelines. | Laws, regulations, interpretive notes, guidelines. |
| 1766876bc5f-272e-40d1-af52-f8c6ffadd052 | Not Translated (0%) | Compliance may seem to be a regulatory construct that is established to create complexity, paper-heavy manuals, and endless reporting. | Compliance may seem to be a regulatory construct that is established to create complexity, paper-heavy manuals, and endless reporting. |
| 177eeda1a52-1cdb-4076-ba3d-486e1a1ab523 | Not Translated (0%) | And while it may have some (or all of these things), compliance—and especially sanctions compliance—is so much more. | And while it may have some (or all of these things), compliance—and especially sanctions compliance—is so much more. |
| 178eeda1a52-1cdb-4076-ba3d-486e1a1ab523 | Not Translated (0%) | By looking past the regulatory construct, we see world leaders negotiating foreign policy, cargo ships evading naval destroyers, and powerful institutions circumventing regulatory oversight. | By looking past the regulatory construct, we see world leaders negotiating foreign policy, cargo ships evading naval destroyers, and powerful institutions circumventing regulatory oversight. |
| 179eeda1a52-1cdb-4076-ba3d-486e1a1ab523 | Not Translated (0%) | This all takes place on an international stage, and we are part of this as we design and implement processes in the global fight for important initiatives, such as counterterrorism, nonproliferation of weapons of mass destruction, and the expansion of human rights. | This all takes place on an international stage, and we are part of this as we design and implement processes in the global fight for important initiatives, such as counterterrorism, nonproliferation of weapons of mass destruction, and the expansion of human rights. |
| 180eeda1a52-1cdb-4076-ba3d-486e1a1ab523 | Not Translated (0%) | As a profession, sanctions compliance is meaningful. | As a profession, sanctions compliance is meaningful. |
| 181eeda1a52-1cdb-4076-ba3d-486e1a1ab523 | Not Translated (0%) | It may not be attention-grabbing like the professions of movie stars or professional athletes, but the complexity of law, the paper-heavy manuals clarifying regulations, and the endless reporting are all part of a national, international, and global initiative to bring about meaningful change. | It may not be attention-grabbing like the professions of movie stars or professional athletes, but the complexity of law, the paper-heavy manuals clarifying regulations, and the endless reporting are all part of a national, international, and global initiative to bring about meaningful change. |
| 182624ba6e0-e768-41b5-85a0-07141f5fdb10 | Not Translated (0%) | Sanctions are defined as measures or actions taken against a target to influence its behavior, policy, or actions. | Sanctions are defined as measures or actions taken against a target to influence its behavior, policy, or actions. |
| 183624ba6e0-e768-41b5-85a0-07141f5fdb10 | Not Translated (0%) | For our purposes, we have adopted a practical definition to recognize the use of sanctions as a policy instrument. | For our purposes, we have adopted a practical definition to recognize the use of sanctions as a policy instrument. |
| 184624ba6e0-e768-41b5-85a0-07141f5fdb10 | Not Translated (0%) | Simply stated, sanctions have three components: | Simply stated, sanctions have three components: |
| 185559c69b3-9f79-4214-afe6-ffe46f240209 | Not Translated (0%) | an economic action | an economic action |
| 186d5520e30-7b9f-4638-b1ad-dfc046874de0 | Not Translated (0%) | taken against a target (a state, class of persons, an individual person, or even a function) | taken against a target (a state, class of persons, an individual person, or even a function) |
| 18708ecae07-715b-41c2-b043-ef3794d63aea | Not Translated (0%) | to influence the target’s actions | to influence the target’s actions |
| 1880f488082-675c-486d-8250-ee41d82b5d8a | Not Translated (0%) | Sanctions can restrict trade, financial transactions, diplomatic relations, and movement. | Sanctions can restrict trade, financial transactions, diplomatic relations, and movement. |
| 1890f488082-675c-486d-8250-ee41d82b5d8a | Not Translated (0%) | They can be specific or general in their implementation and enforcement. | They can be specific or general in their implementation and enforcement. |
| 1900f488082-675c-486d-8250-ee41d82b5d8a | Not Translated (0%) | Sanctions are also referred to as restrictive measures. | Sanctions are also referred to as restrictive measures. |
| 1910f488082-675c-486d-8250-ee41d82b5d8a | Not Translated (0%) | Sanctions compliance is the act of adhering to the sanctions-related legislation, regulations, rules, and norms that make up the complex sanctions landscape. | Sanctions compliance is the act of adhering to the sanctions-related legislation, regulations, rules, and norms that make up the complex sanctions landscape. |
| 1920f488082-675c-486d-8250-ee41d82b5d8a | Not Translated (0%) | However, as with sanctions, sanctions compliance is not a modern concept. | However, as with sanctions, sanctions compliance is not a modern concept. |
| 19374288c65-03bd-4972-91ee-bffa5bfc8f2a | Not Translated (0%) | History of Sanctions | History of Sanctions |
| 1941a6d108b-dbe0-4476-ba0d-0bf2cedfb999 | Not Translated (0%) | While the methods used to enforce sanctions have evolved significantly over the past couple of decades, the nature of sanctions has remained fundamentally the same. | While the methods used to enforce sanctions have evolved significantly over the past couple of decades, the nature of sanctions has remained fundamentally the same. |
| 1951a6d108b-dbe0-4476-ba0d-0bf2cedfb999 | Not Translated (0%) | One of the first recorded instances of sanctions dates back to the fifth century BC. | One of the first recorded instances of sanctions dates back to the fifth century BC. |
| 1961a6d108b-dbe0-4476-ba0d-0bf2cedfb999 | Not Translated (0%) | With the Megarian Decree in 432 BC, the Athenians levied economic sanctions, banning citizens of Megara from accessing markets in the Athenian empire. | With the Megarian Decree in 432 BC, the Athenians levied economic sanctions, banning citizens of Megara from accessing markets in the Athenian empire. |
| 1971a6d108b-dbe0-4476-ba0d-0bf2cedfb999 | Not Translated (0%) | There were a few reports that Megarian citizens suffered starvation, and some people believe these sanctions led to the outbreak of the Second Peloponnesian War. | There were a few reports that Megarian citizens suffered starvation, and some people believe these sanctions led to the outbreak of the Second Peloponnesian War. |
| 19849be7d75-b3d1-47a0-90f3-8bbdd8309511 | Not Translated (0%) | For most of history, sanctions involved governments choosing to physically block or embargo trade intended for another nation. | For most of history, sanctions involved governments choosing to physically block or embargo trade intended for another nation. |
| 19949be7d75-b3d1-47a0-90f3-8bbdd8309511 | Not Translated (0%) | Sanctions began to evolve to their current state near the end of the 19th century. | Sanctions began to evolve to their current state near the end of the 19th century. |
| 20049be7d75-b3d1-47a0-90f3-8bbdd8309511 | Not Translated (0%) | Within Europe, peace societies began to discuss the evils of war and pacifist alternatives. | Within Europe, peace societies began to discuss the evils of war and pacifist alternatives. |
| 20149be7d75-b3d1-47a0-90f3-8bbdd8309511 | Not Translated (0%) | Sanctions were considered an alternative to war. | Sanctions were considered an alternative to war. |
| 20249be7d75-b3d1-47a0-90f3-8bbdd8309511 | Not Translated (0%) | During the 19th century, economic sanctions consisted of a type of blockade involving the deployment of military troops by a country or coalition to block ports of other countries they were not fighting. | During the 19th century, economic sanctions consisted of a type of blockade involving the deployment of military troops by a country or coalition to block ports of other countries they were not fighting. |
| 20349be7d75-b3d1-47a0-90f3-8bbdd8309511 | Not Translated (0%) | The majority of naval blockades were used during war. | The majority of naval blockades were used during war. |
| 20449be7d75-b3d1-47a0-90f3-8bbdd8309511 | Not Translated (0%) | However, pacific blockades, or blockades used between nations that were on peaceful terms, were also used in order to coerce nations to pay debts or settle other conflicts. | However, pacific blockades, or blockades used between nations that were on peaceful terms, were also used in order to coerce nations to pay debts or settle other conflicts. |
| 2056b92f23f-19d3-4013-a8b5-7b42f4b169f3 | Not Translated (0%) | Lance Davis and Stanley Engerman, “History Lessons: | Lance Davis and Stanley Engerman, “History Lessons: |
| 2066b92f23f-19d3-4013-a8b5-7b42f4b169f3 | Not Translated (0%) | Sanctions: | Sanctions: |
| 2076b92f23f-19d3-4013-a8b5-7b42f4b169f3 | Not Translated (0%) | Neither War nor Peace,” The Journal of Economic Perspectives 17, no. 2 (2003), 189. | Neither War nor Peace,” The Journal of Economic Perspectives 17, no. 2 (2003), 189. |
| 208bce472ea-e2ff-45f6-909c-8c69ab116267 | Not Translated (0%) | Following World War I, or the Great War, calls for pacifism again gained traction. | Following World War I, or the Great War, calls for pacifism again gained traction. |
| 209bce472ea-e2ff-45f6-909c-8c69ab116267 | Not Translated (0%) | US President Woodrow Wilson said of sanctions, “Apply this economic, peaceful, silent, deadly remedy, and there will be no need for force.” | US President Woodrow Wilson said of sanctions, “Apply this economic, peaceful, silent, deadly remedy, and there will be no need for force.” |
| 210bce472ea-e2ff-45f6-909c-8c69ab116267 | Not Translated (0%) | Others have said the human and financial costs of military force for coercion have become prohibitive. | Others have said the human and financial costs of military force for coercion have become prohibitive. |
| 211bce472ea-e2ff-45f6-909c-8c69ab116267 | Not Translated (0%) | Although the United States never joined, Wilson aided in the establishment of the League of Nations, a predecessor of the United Nations. | Although the United States never joined, Wilson aided in the establishment of the League of Nations, a predecessor of the United Nations. |
| 212bce472ea-e2ff-45f6-909c-8c69ab116267 | Not Translated (0%) | The power to deploy sanctions was included in the League’s Covenant. | The power to deploy sanctions was included in the League’s Covenant. |
| 213bce472ea-e2ff-45f6-909c-8c69ab116267 | Not Translated (0%) | Article 16 of the Covenant authorized economic sanctions and military actions against any state that employs war. | Article 16 of the Covenant authorized economic sanctions and military actions against any state that employs war. |
| 214bce472ea-e2ff-45f6-909c-8c69ab116267 | Not Translated (0%) | Four cases of collective action sanctions were undertaken after the authorization. | Four cases of collective action sanctions were undertaken after the authorization. |
| 215bce472ea-e2ff-45f6-909c-8c69ab116267 | Not Translated (0%) | The least successful was in 1935–36 when the League of Nations joined with the United Kingdom against Italy after its invasion of Ethiopia. | The least successful was in 1935–36 when the League of Nations joined with the United Kingdom against Italy after its invasion of Ethiopia. |
| 216bce472ea-e2ff-45f6-909c-8c69ab116267 | Not Translated (0%) | Sanctions failed there because other European countries did not follow the League’s restrictions. | Sanctions failed there because other European countries did not follow the League’s restrictions. |
| 2175d9cff59-fa23-4c43-8209-9ed12409a96b | Not Translated (0%) | Davis and Engerman, 189. | Davis and Engerman, 189. |
| 21825bc69a5-c3e1-40db-b080-ecf4931b7e92 | Not Translated (0%) | League members worked together to impose boycotts, embargoes, and other restrictive trade measures against aggressor nations with the intent of bringing about a change in those governments’ behaviors and policies while avoiding war. | League members worked together to impose boycotts, embargoes, and other restrictive trade measures against aggressor nations with the intent of bringing about a change in those governments’ behaviors and policies while avoiding war. |
| 21925bc69a5-c3e1-40db-b080-ecf4931b7e92 | Not Translated (0%) | The ideas behind the League of Nations resemble the beginning of multilateral sanctions, or multiple countries working together to impose sanctions on another country. | The ideas behind the League of Nations resemble the beginning of multilateral sanctions, or multiple countries working together to impose sanctions on another country. |
| 22025bc69a5-c3e1-40db-b080-ecf4931b7e92 | Not Translated (0%) | Unilateral sanctions are imposed by a single country against a target. | Unilateral sanctions are imposed by a single country against a target. |
| 2219106e6c2-decf-480e-b380-fce213d006ef | Not Translated (0%) | US trade sanctions against Japan factored into the Japanese decision to enter World War II and attack Pearl Harbor. | US trade sanctions against Japan factored into the Japanese decision to enter World War II and attack Pearl Harbor. |
| 2229106e6c2-decf-480e-b380-fce213d006ef | Not Translated (0%) | This situation provoked questions regarding whether sanctions were an alternative to war, or whether they instead might rush nations to use military force. | This situation provoked questions regarding whether sanctions were an alternative to war, or whether they instead might rush nations to use military force. |
| 2239106e6c2-decf-480e-b380-fce213d006ef | Not Translated (0%) | After the conclusion of World War II, the United Nations was formed in 1945, and sanctions were formally recognized within the charter as a foreign policy tool. | After the conclusion of World War II, the United Nations was formed in 1945, and sanctions were formally recognized within the charter as a foreign policy tool. |
| 224c5ffcd08-432f-46a0-8d0a-8dc9e6e9e8fe | Not Translated (0%) | During the Cold War, governments imposed sanctions more often than in prior decades. | During the Cold War, governments imposed sanctions more often than in prior decades. |
| 225c5ffcd08-432f-46a0-8d0a-8dc9e6e9e8fe | Not Translated (0%) | The United States, as one of the two superpowers, imposed sanctions significantly more than any other country. | The United States, as one of the two superpowers, imposed sanctions significantly more than any other country. |
| 226c5ffcd08-432f-46a0-8d0a-8dc9e6e9e8fe | Not Translated (0%) | It was not until the 1990s, after the Cold War ended, that unilateral sanctions began to be replaced by multilateral, intergovernmental coalitions. | It was not until the 1990s, after the Cold War ended, that unilateral sanctions began to be replaced by multilateral, intergovernmental coalitions. |
| 227c5ffcd08-432f-46a0-8d0a-8dc9e6e9e8fe | Not Translated (0%) | While the US continued leading with the most sanctions, Western Europe, and especially the United Kingdom, began playing a more active role. | While the US continued leading with the most sanctions, Western Europe, and especially the United Kingdom, began playing a more active role. |
| 2285cd8849a-9357-47df-8241-1201dd7b01bd | Not Translated (0%) | Davis and Engerman, 198-190. | Davis and Engerman, 198-190. |
| 229676f8825-5165-48f2-a58e-fc2b3f5bccf5 | Not Translated (0%) | The most high-profile sanctions were imposed between 1990 and 2003 by the UN against Iraq, leading up to and following the first Gulf War. | The most high-profile sanctions were imposed between 1990 and 2003 by the UN against Iraq, leading up to and following the first Gulf War. |
| 230b9773935-3726-4e9f-9d40-f1c4d50b2303 | Not Translated (0%) | Kimberly Ann Elliott, Gary Clyde Hufbauer, Barbara Oegg, “Sanctions,” The Library of Economics and Liberty, 1. | Kimberly Ann Elliott, Gary Clyde Hufbauer, Barbara Oegg, “Sanctions,” The Library of Economics and Liberty, 1. |
| 2317cf56f23-c5f9-40c7-9fcf-ed955c98f0cd | Not Translated (0%) | These sanctions cost Iraq an estimated 48% of its gross national product and had the greatest impact on the livelihoods and mortality of the country’s poorest residents. | These sanctions cost Iraq an estimated 48% of its gross national product and had the greatest impact on the livelihoods and mortality of the country’s poorest residents. |
| 232369bcbc4-7257-4315-8f9d-2c2609f18247 | Not Translated (0%) | Davis and Engerman, 193. | Davis and Engerman, 193. |
| 233bf5399d2-08e5-43eb-9c34-328d63f833fc | Not Translated (0%) | Since 1990, sanctions have often been targeted at political leaders, drug lords, and terrorists in an attempt to reduce the humanitarian implications that resulted from the comprehensive sanctions in Iraq. | Since 1990, sanctions have often been targeted at political leaders, drug lords, and terrorists in an attempt to reduce the humanitarian implications that resulted from the comprehensive sanctions in Iraq. |
| 23434835b7d-0613-4674-9e9f-9ada4159fb8e | Not Translated (0%) | Elliot, Hufbauer, and Oegg, 1. | Elliot, Hufbauer, and Oegg, 1. |
| 2357ecc05b2-b8b8-4a59-ad37-fdaf12752fde | Not Translated (0%) | Purpose of Sanctions | Purpose of Sanctions |
| 236cf50d0fe-d017-4a90-afa7-52ea7dec6dac | Not Translated (0%) | Sanctions can provide an alternative to the use of force. | Sanctions can provide an alternative to the use of force. |
| 237cf50d0fe-d017-4a90-afa7-52ea7dec6dac | Not Translated (0%) | They are an extension of a nation’s foreign policy to bring about another nation’s change in behavior or foreign policy. | They are an extension of a nation’s foreign policy to bring about another nation’s change in behavior or foreign policy. |
| 238cf50d0fe-d017-4a90-afa7-52ea7dec6dac | Not Translated (0%) | In relation to changing a nation’s behavior, sanctions may be used for: | In relation to changing a nation’s behavior, sanctions may be used for: |
| 23929413d34-640d-4f0a-b1b8-3f5b0388b75c | Not Translated (0%) | Deterrence | Deterrence |
| 2403ce54d0b-de12-46c0-9e11-112b53cedd77 | Not Translated (0%) | Prevention | Prevention |
| 2414b300062-c37c-4872-8587-ad804e84614c | Not Translated (0%) | Punishment | Punishment |
| 2429bca05b6-d73d-4b81-8efb-07920bd2d61a | Not Translated (0%) | Sanctions can target geography or activities. | Sanctions can target geography or activities. |
| 2439bca05b6-d73d-4b81-8efb-07920bd2d61a | Not Translated (0%) | Geographic sanctions target specific countries or regions, as in the cases of sanctions against North Korea or Crimea. | Geographic sanctions target specific countries or regions, as in the cases of sanctions against North Korea or Crimea. |
| 2449bca05b6-d73d-4b81-8efb-07920bd2d61a | Not Translated (0%) | Thematic sanctions focus on particular issues or concerns that may cut across geographic boundaries, as in the case of counter-narcotics sanctions. | Thematic sanctions focus on particular issues or concerns that may cut across geographic boundaries, as in the case of counter-narcotics sanctions. |
| 2459bca05b6-d73d-4b81-8efb-07920bd2d61a | Not Translated (0%) | The EU has historically imposed geographic sanctions. | The EU has historically imposed geographic sanctions. |
| 2469bca05b6-d73d-4b81-8efb-07920bd2d61a | Not Translated (0%) | In recent years, the EU has adopted activity or issue-based sanctions as well, including those promoting human rights. | In recent years, the EU has adopted activity or issue-based sanctions as well, including those promoting human rights. |
| 2475d212bb1-5d85-402c-a1be-7c730f66e5a9 | Not Translated (0%) | In addition to being used to protect human rights and avoid using military force, sanctions have been used for the following purposes: | In addition to being used to protect human rights and avoid using military force, sanctions have been used for the following purposes: |
| 2481824d67d-078b-4c15-b11a-02144183e65e | Not Translated (0%) | Preventing war | Preventing war |
| 2493a01e61b-3f19-4e2f-927f-732bc7b513e1 | Not Translated (0%) | Promoting democratic values | Promoting democratic values |
| 2508a571dbb-1894-4509-8f17-9575db720e08 | Not Translated (0%) | Punishing human rights abusers | Punishing human rights abusers |
| 25102372235-3521-488f-b38c-86d8aec65c44 | Not Translated (0%) | Preventing nuclear proliferation and the proliferation of weapons of mass destruction | Preventing nuclear proliferation and the proliferation of weapons of mass destruction |
| 25283f6a82f-bf55-4455-84b3-9cbdbddfb51d | Not Translated (0%) | The freeing of captured citizens | The freeing of captured citizens |
| 253ca21b139-f10c-4494-a5df-8a3879b9fdc3 | Not Translated (0%) | The restoration of sovereign lands | The restoration of sovereign lands |
| 25430535abb-2195-4321-8eac-b2450cda2e4a | Not Translated (0%) | Davis & Engerman, 190. | Davis & Engerman, 190. |
| 2557c2e8548-faad-45b6-961f-cb0ff71bcec0 | Not Translated (0%) | Sanctions Regimes | Sanctions Regimes |
| 256818dc2b7-580f-4927-953a-26487af7b3ff | Not Translated (0%) | Sanctions are often referred to as sanctions regimes—a set of sanctions that have a common theme. | Sanctions are often referred to as sanctions regimes—a set of sanctions that have a common theme. |
| 257818dc2b7-580f-4927-953a-26487af7b3ff | Not Translated (0%) | Sanctions regimes are either referred to by the issuer of the set of sanctions or by the intended purpose of the set of sanctions. | Sanctions regimes are either referred to by the issuer of the set of sanctions or by the intended purpose of the set of sanctions. |
| 258818dc2b7-580f-4927-953a-26487af7b3ff | Not Translated (0%) | Examples include the “Office of Foreign Assets Control (OFAC) sanctions regime” and the “North Korea sanctions regime.” | Examples include the “Office of Foreign Assets Control (OFAC) sanctions regime” and the “North Korea sanctions regime.” |
| 259818dc2b7-580f-4927-953a-26487af7b3ff | Not Translated (0%) | Depending on the context, a sanctions regime may be limited to one country’s or multiple countries’ involvement. | Depending on the context, a sanctions regime may be limited to one country’s or multiple countries’ involvement. |
| 260c1295263-b68d-4310-86ea-ed56c53c6934 | Not Translated (0%) | Affecting Behavioral Change | Affecting Behavioral Change |
| 261e4c3dddd-8acf-4cfa-bd18-180b674ba344 | Not Translated (0%) | At their core, sanctions are intended to affect behavioral change through deterrence, prevention, and punishment. | At their core, sanctions are intended to affect behavioral change through deterrence, prevention, and punishment. |
| 262e4c3dddd-8acf-4cfa-bd18-180b674ba344 | Not Translated (0%) | In some form or another, all the other purposes of sanctions contribute to this end. | In some form or another, all the other purposes of sanctions contribute to this end. |
| 263e4c3dddd-8acf-4cfa-bd18-180b674ba344 | Not Translated (0%) | Often review boards or committees are established to monitor the effectiveness of sanctions because few if any sanctions are intended to be solely punitive in nature; rather, they include a combination of preventative and deterrence measures. | Often review boards or committees are established to monitor the effectiveness of sanctions because few if any sanctions are intended to be solely punitive in nature; rather, they include a combination of preventative and deterrence measures. |
| 264e4c3dddd-8acf-4cfa-bd18-180b674ba344 | Not Translated (0%) | Considering that the political leaders who may be the targets of sanctions rarely are as impacted as those in the lowest economic situations, sanctions that do not prevent or deter targets from their actions may need to be reevaluated or modified. | Considering that the political leaders who may be the targets of sanctions rarely are as impacted as those in the lowest economic situations, sanctions that do not prevent or deter targets from their actions may need to be reevaluated or modified. |
| 265141be3f8-2c24-421e-aefb-5f82913cac30 | Not Translated (0%) | North Korea’s leader, Kim Jong-un, is often spotted being driven in a Rolls-Royce or Mercedes-Benz vehicle when visiting other countries. | North Korea’s leader, Kim Jong-un, is often spotted being driven in a Rolls-Royce or Mercedes-Benz vehicle when visiting other countries. |
| 266141be3f8-2c24-421e-aefb-5f82913cac30 | Not Translated (0%) | Although the UN prohibits the sale of luxury goods to North Korea, the political elite can often obtain them; the same is not true for ordinary citizens. | Although the UN prohibits the sale of luxury goods to North Korea, the political elite can often obtain them; the same is not true for ordinary citizens. |
| 26751a885a2-e905-4bfe-93b1-9be986e582a7 | Not Translated (0%) | Jacob Oliva, “Daimler: | Jacob Oliva, “Daimler: |
| 26851a885a2-e905-4bfe-93b1-9be986e582a7 | Not Translated (0%) | We Don’t Sell Limos To North Korea’s Kim Jong-Un,” Motor 1, April 27, 2019 | We Don’t Sell Limos To North Korea’s Kim Jong-Un,” Motor 1, April 27, 2019 |
| 2695db377c4-df03-496c-a659-35058efe61c6 | Not Translated (0%) | Other than those sanctions targeted at criminals, such as narcotics kingpins, who are unlikely to reconsider what they do for a living, sanctions are most effective when tied to incentives for change, such as the resumption of international aid and loans from supranational organizations. | Other than those sanctions targeted at criminals, such as narcotics kingpins, who are unlikely to reconsider what they do for a living, sanctions are most effective when tied to incentives for change, such as the resumption of international aid and loans from supranational organizations. |
| 270f107f692-ed44-4284-a161-bc053b809717 | Not Translated (0%) | Governments sometimes use sanctions to demonstrate their moral resolve, both at home and abroad. | Governments sometimes use sanctions to demonstrate their moral resolve, both at home and abroad. |
| 271f107f692-ed44-4284-a161-bc053b809717 | Not Translated (0%) | In 1986, for example, the US used sanctions against South Africa that banned new investments from the United States in South Africa, any sales to the South African police or military, and any new bank loans, except for the purpose of trade. | In 1986, for example, the US used sanctions against South Africa that banned new investments from the United States in South Africa, any sales to the South African police or military, and any new bank loans, except for the purpose of trade. |
| 27285735086-8003-4827-b660-ad5d8cbcd358 | Not Translated (0%) | Richard Knight, “Sanctions, Disinvestment, and U.S. Corporations in South Africa,” Sanctioning Apartheid, Africa World Press: | Richard Knight, “Sanctions, Disinvestment, and U.S. Corporations in South Africa,” Sanctioning Apartheid, Africa World Press: |
| 27385735086-8003-4827-b660-ad5d8cbcd358 | Not Translated (0%) | 1990. | 1990. |
| 274d490176f-1857-4234-bd17-8eacff166ef5 | Not Translated (0%) | The US also prohibited the import of agricultural goods, textiles, shellfish, steel, iron, uranium, and the products of state-owned corporations. | The US also prohibited the import of agricultural goods, textiles, shellfish, steel, iron, uranium, and the products of state-owned corporations. |
| 275c2c89cbf-da79-4359-9a7a-536e1f365aca | Not Translated (0%) | Knight. | Knight. |
| 276edb9547d-444f-463f-b58f-55e685bcc9bf | Not Translated (0%) | While the impact of the sanctions and the extent to which they quickened the end of apartheid are uncertain, they were important for the US to implement domestically to show that the US condemned the state-sponsored racial inequality and segregation in South Africa at the time. | While the impact of the sanctions and the extent to which they quickened the end of apartheid are uncertain, they were important for the US to implement domestically to show that the US condemned the state-sponsored racial inequality and segregation in South Africa at the time. |
| 27764609f78-a64a-442d-b0e4-2d76f6ab4590 | Not Translated (0%) | Why Sanctions Exist | Why Sanctions Exist |
| 2784e292f72-9972-4a48-af3a-3d9881778487 | Not Translated (0%) | Preventing the Proliferation of Weapons of Mass Destruction | Preventing the Proliferation of Weapons of Mass Destruction |
| 279a82c12d3-2a0f-4db2-b4be-20da0bb9880f | Not Translated (0%) | The UN’s Treaty on the Non-Proliferation of Nuclear Weapons, commonly known as the Non-Proliferation Treaty or NPT, was signed in 1968 and went into effect in March 1970. | The UN’s Treaty on the Non-Proliferation of Nuclear Weapons, commonly known as the Non-Proliferation Treaty or NPT, was signed in 1968 and went into effect in March 1970. |
| 280a82c12d3-2a0f-4db2-b4be-20da0bb9880f | Not Translated (0%) | On May 11, 1995, the NPT was extended indefinitely. | On May 11, 1995, the NPT was extended indefinitely. |
| 281a82c12d3-2a0f-4db2-b4be-20da0bb9880f | Not Translated (0%) | The NPT solidified the international community’s commitment to preventing the spread of nuclear weapons. | The NPT solidified the international community’s commitment to preventing the spread of nuclear weapons. |
| 282a82c12d3-2a0f-4db2-b4be-20da0bb9880f | Not Translated (0%) | Its goal is to create a binding commitment of disarmament by the five declared nuclear-weapon states and to promote the peaceful use of nuclear technology while preventing the spread of nuclear weapons and weapons technology. | Its goal is to create a binding commitment of disarmament by the five declared nuclear-weapon states and to promote the peaceful use of nuclear technology while preventing the spread of nuclear weapons and weapons technology. |
| 2837a153d5a-0068-468c-846b-33e1c3bd286d | Not Translated (0%) | The NPT established the International Atomic Energy Agency (IAEA) to monitor compliance with the terms of the NPT. | The NPT established the International Atomic Energy Agency (IAEA) to monitor compliance with the terms of the NPT. |
| 2847a153d5a-0068-468c-846b-33e1c3bd286d | Not Translated (0%) | The IAEA periodically inspects the facilities and operations of member nations who have concluded nuclear safeguards agreements with the Agency. | The IAEA periodically inspects the facilities and operations of member nations who have concluded nuclear safeguards agreements with the Agency. |
| 2857a153d5a-0068-468c-846b-33e1c3bd286d | Not Translated (0%) | It seeks to build confidence and trust among member nations, which helps to prevent the development of fissile material for military use. | It seeks to build confidence and trust among member nations, which helps to prevent the development of fissile material for military use. |
| 286124fb392-9d5c-48fa-8948-f6036f11232b | Not Translated (0%) | United Nations Office for Disarmament Affairs, Treaty on the Non-Proliferation of Nuclear Weapons (NPT). | United Nations Office for Disarmament Affairs, Treaty on the Non-Proliferation of Nuclear Weapons (NPT). |
| 2876ba9267f-a411-4742-b9a8-d7c2099f48d7 | Not Translated (0%) | Nonproliferation sanctions seek to disrupt the function of crime and weapons proliferation. | Nonproliferation sanctions seek to disrupt the function of crime and weapons proliferation. |
| 2886ba9267f-a411-4742-b9a8-d7c2099f48d7 | Not Translated (0%) | These sanctions can be applied to countries that fail to comply with sanctions or those that help others circumvent sanctions. | These sanctions can be applied to countries that fail to comply with sanctions or those that help others circumvent sanctions. |
| 2896ba9267f-a411-4742-b9a8-d7c2099f48d7 | Not Translated (0%) | Libya is often seen as a successful example of the use of sanctions in deterring proliferation. | Libya is often seen as a successful example of the use of sanctions in deterring proliferation. |
| 29014a6d28f-4169-4163-adac-4b546e2056a1 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 29114a6d28f-4169-4163-adac-4b546e2056a1 | Not Translated (0%) | LIBYA AND THE NPT | LIBYA AND THE NPT |
| 292fd915e2c-e658-445a-8b34-301fba323854 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 2934e21f1d2-ab69-42a0-9b8c-c0f22b00f2c2 | Not Translated (0%) | Libya ratified the NPT on May 26, 1975. | Libya ratified the NPT on May 26, 1975. |
| 2944e21f1d2-ab69-42a0-9b8c-c0f22b00f2c2 | Not Translated (0%) | Less than five years later, the US sanctioned Libya as a state sponsor of terrorism. | Less than five years later, the US sanctioned Libya as a state sponsor of terrorism. |
| 2954e21f1d2-ab69-42a0-9b8c-c0f22b00f2c2 | Not Translated (0%) | In the meantime, Libya, with the aid of Russia, continued developing its nuclear capabilities. | In the meantime, Libya, with the aid of Russia, continued developing its nuclear capabilities. |
| 2964e21f1d2-ab69-42a0-9b8c-c0f22b00f2c2 | Not Translated (0%) | The US again imposed additional economic sanctions in 1986, and in 1992 the UN Security Council began imposing sanctions. | The US again imposed additional economic sanctions in 1986, and in 1992 the UN Security Council began imposing sanctions. |
| 2974e21f1d2-ab69-42a0-9b8c-c0f22b00f2c2 | Not Translated (0%) | In 1996, the Iran and Libya Sanctions Act (ILSA) became law. | In 1996, the Iran and Libya Sanctions Act (ILSA) became law. |
| 2984e21f1d2-ab69-42a0-9b8c-c0f22b00f2c2 | Not Translated (0%) | ILSA enabled the US president to further impose sanctions against foreign companies that invested $40 million or more in the Libyan oil industry. | ILSA enabled the US president to further impose sanctions against foreign companies that invested $40 million or more in the Libyan oil industry. |
| 2994e21f1d2-ab69-42a0-9b8c-c0f22b00f2c2 | Not Translated (0%) | This number was lowered in 2002 to $20 million. | This number was lowered in 2002 to $20 million. |
| 3005314b12f-ef85-4f93-9ca6-c1bf151e3949 | Not Translated (0%) | Despite progress and setbacks in Libyan relations, Libyan president Muammar Gaddafi announced in December 2003 that it would renounce its Weapons of Mass Destruction (WMD) program. | Despite progress and setbacks in Libyan relations, Libyan president Muammar Gaddafi announced in December 2003 that it would renounce its Weapons of Mass Destruction (WMD) program. |
| 3015314b12f-ef85-4f93-9ca6-c1bf151e3949 | Not Translated (0%) | Libya also allowed the IAEA and other international bodies into the country, enabling these organizations to remove 55,000 pounds of documents and components of its uranium enrichment program at one time. | Libya also allowed the IAEA and other international bodies into the country, enabling these organizations to remove 55,000 pounds of documents and components of its uranium enrichment program at one time. |
| 302aca46a8b-4f63-4139-b497-32cf9fc84462 | Not Translated (0%) | Relations between Libya and the international community began to normalize with relief from sanctions following within a year of Gaddafi’s announcement. | Relations between Libya and the international community began to normalize with relief from sanctions following within a year of Gaddafi’s announcement. |
| 3038dfcbd63-cec8-4c19-86fe-f8f3eff70d59 | Not Translated (0%) | Libya has been seen as a model for other noncompliant nations with international obligations. | Libya has been seen as a model for other noncompliant nations with international obligations. |
| 3048dfcbd63-cec8-4c19-86fe-f8f3eff70d59 | Not Translated (0%) | In May 2005, during the Nonproliferation Treaty Review Conference, US assistant secretary of state for arms control Stephen Rademaker stated that Libya’s choice “demonstrates that, in a world of strong nonproliferation norms, it is never too late to make the decision to become a fully compliant NPT state,” and that the decision had been “amply rewarded.” | In May 2005, during the Nonproliferation Treaty Review Conference, US assistant secretary of state for arms control Stephen Rademaker stated that Libya’s choice “demonstrates that, in a world of strong nonproliferation norms, it is never too late to make the decision to become a fully compliant NPT state,” and that the decision had been “amply rewarded.” |
| 305a1c06730-0b7d-455d-924f-86ae0d8e293b | Not Translated (0%) | Arms Control Association, Chronology of Libya’s Disarmament and Relations with the United States, January 2018. | Arms Control Association, Chronology of Libya’s Disarmament and Relations with the United States, January 2018. |
| 3069c81bdec-5254-45e2-9b59-3c559136ca1d | Not Translated (0%) | The case of Libya also demonstrates that sanctions should be used primarily to incentivize changes in behavior—not just to punish noncompliant nations. | The case of Libya also demonstrates that sanctions should be used primarily to incentivize changes in behavior—not just to punish noncompliant nations. |
| 3076fc841aa-d7ae-42ae-895b-e58266f93f91 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 308b2ae3712-1a00-4ee4-89e5-26059c8a83b8 | Not Translated (0%) | Sanctions are often a long-term strategy to bring about change as an alternative to war. | Sanctions are often a long-term strategy to bring about change as an alternative to war. |
| 3097a7476da-607f-4fc4-9527-9adc882f2772 | Not Translated (0%) | Multilateral sanctions, such as those imposed by the UN, are generally more effective than unilateral sanctions in achieving a foreign policy objective. | Multilateral sanctions, such as those imposed by the UN, are generally more effective than unilateral sanctions in achieving a foreign policy objective. |
| 310bb99d682-68ff-49b7-a441-6898ebbbe648 | Not Translated (0%) | Sanctions work best when paired with incentives, e.g., foreign investment, instead of only being punitive. | Sanctions work best when paired with incentives, e.g., foreign investment, instead of only being punitive. |
| 311873b06a5-3b1b-471f-9306-53e0db885145 | Not Translated (0%) | Diminishing the Power of Regimes to Commit Human Rights Violations | Diminishing the Power of Regimes to Commit Human Rights Violations |
| 312d7e8485f-2822-4bb9-960b-d1c3f4b68e07 | Not Translated (0%) | Sanctions are not just about preventing war. | Sanctions are not just about preventing war. |
| 313d7e8485f-2822-4bb9-960b-d1c3f4b68e07 | Not Translated (0%) | The goal of a sanction might be to achieve environmental objectives or human rights protections. | The goal of a sanction might be to achieve environmental objectives or human rights protections. |
| 314d7e8485f-2822-4bb9-960b-d1c3f4b68e07 | Not Translated (0%) | Sanctions have been used in response to perceived breaches of many different types of international standards, and for various purposes, including to influence actions. | Sanctions have been used in response to perceived breaches of many different types of international standards, and for various purposes, including to influence actions. |
| 315d7e8485f-2822-4bb9-960b-d1c3f4b68e07 | Not Translated (0%) | Examples of thematic sanctions include: | Examples of thematic sanctions include: |
| 3165d059efd-c0e7-4b10-8ffe-1bc20e2c3823 | Not Translated (0%) | The strengthening of human rights or labor rights | The strengthening of human rights or labor rights |
| 317aaa3fe7c-bfff-4062-8624-bbc32ccbbf70 | Not Translated (0%) | The freeing of captured citizens | The freeing of captured citizens |
| 3186beb1a1d-d871-4479-9163-944b7aa4c728 | Not Translated (0%) | The reversal of captures of land | The reversal of captures of land |
| 319572a54be-65a7-4557-8eba-eb98f6168b71 | Not Translated (0%) | Different regimes are limited by their charters in whether they can pursue sanctions to enforce issues. | Different regimes are limited by their charters in whether they can pursue sanctions to enforce issues. |
| 320572a54be-65a7-4557-8eba-eb98f6168b71 | Not Translated (0%) | Moreover, sanctions may also be limited by the support that can be garnered among nations. | Moreover, sanctions may also be limited by the support that can be garnered among nations. |
| 321d8766bb2-2758-4a19-98d0-b677ed5e254c | Not Translated (0%) | In the US, the Magnitsky Act allows for unilateral, global sanctions to be imposed on human rights offenders and corrupt actors. | In the US, the Magnitsky Act allows for unilateral, global sanctions to be imposed on human rights offenders and corrupt actors. |
| 322d8766bb2-2758-4a19-98d0-b677ed5e254c | Not Translated (0%) | Assets can be frozen and offenders may be barred from entering the US. | Assets can be frozen and offenders may be barred from entering the US. |
| 323d8766bb2-2758-4a19-98d0-b677ed5e254c | Not Translated (0%) | The act originated from the mistreatment of attorney and auditor Sergei Magnitsky by Russian officials while he was in a Moscow prison for investigating fraud related to Russian tax officials. | The act originated from the mistreatment of attorney and auditor Sergei Magnitsky by Russian officials while he was in a Moscow prison for investigating fraud related to Russian tax officials. |
| 324d8766bb2-2758-4a19-98d0-b677ed5e254c | Not Translated (0%) | The law, formally known as the Russia and Moldova Jackson–Vanik Repeal and Sergei Magnitsky Rule of Law Accountability Act of 2012, allows the US to sanction foreign government officials involved in human rights abuses anywhere in the world, including those found involved with the assassination of the Washington Post reporter Jamal Khashoggi in 2018. | The law, formally known as the Russia and Moldova Jackson–Vanik Repeal and Sergei Magnitsky Rule of Law Accountability Act of 2012, allows the US to sanction foreign government officials involved in human rights abuses anywhere in the world, including those found involved with the assassination of the Washington Post reporter Jamal Khashoggi in 2018. |
| 325d6c6b1d4-999d-4786-b64c-ddb54c6fd34e | Not Translated (0%) | Five other countries also have adopted similar laws to the Magnitsky sanctions. | Five other countries also have adopted similar laws to the Magnitsky sanctions. |
| 326d6c6b1d4-999d-4786-b64c-ddb54c6fd34e | Not Translated (0%) | In chronological order, these countries are Canada, Estonia, Lithuania, the United Kingdom, and Latvia. | In chronological order, these countries are Canada, Estonia, Lithuania, the United Kingdom, and Latvia. |
| 327d6c6b1d4-999d-4786-b64c-ddb54c6fd34e | Not Translated (0%) | In January 2019, the EU Parliamentary Assembly urged more countries to follow suit. | In January 2019, the EU Parliamentary Assembly urged more countries to follow suit. |
| 328d6c6b1d4-999d-4786-b64c-ddb54c6fd34e | Not Translated (0%) | It also urged the EU, through its own internal processes, to adopt a human rights sanctions regime. | It also urged the EU, through its own internal processes, to adopt a human rights sanctions regime. |
| 3298405fcd5-cfd3-48ce-beb3-98e0b6350134 | Not Translated (0%) | An example in which the UN has been able to act and make an impact under its charter is the trade of conflict diamonds. | An example in which the UN has been able to act and make an impact under its charter is the trade of conflict diamonds. |
| 3308405fcd5-cfd3-48ce-beb3-98e0b6350134 | Not Translated (0%) | Beginning in 1998, the UN recognized the need to establish trade controls over rough diamonds. | Beginning in 1998, the UN recognized the need to establish trade controls over rough diamonds. |
| 3318405fcd5-cfd3-48ce-beb3-98e0b6350134 | Not Translated (0%) | The illicit trade in diamonds was found to be linked to various conflicts in West Africa, including in Angola, Côte d’Ivoire, Liberia, and Sierra Leone. | The illicit trade in diamonds was found to be linked to various conflicts in West Africa, including in Angola, Côte d’Ivoire, Liberia, and Sierra Leone. |
| 3328405fcd5-cfd3-48ce-beb3-98e0b6350134 | Not Translated (0%) | Based on these findings, the UN established the Kimberley Process Certification Scheme for rough diamonds in 2003. | Based on these findings, the UN established the Kimberley Process Certification Scheme for rough diamonds in 2003. |
| 3338405fcd5-cfd3-48ce-beb3-98e0b6350134 | Not Translated (0%) | Within the process, governments were required to implement controls on the import and export of diamonds to both certify and control the trade and also to create a documentary trail as to the extraction and refinement process. | Within the process, governments were required to implement controls on the import and export of diamonds to both certify and control the trade and also to create a documentary trail as to the extraction and refinement process. |
| 334e7a1d93b-c45a-40cb-a960-40b751d4c2b7 | Not Translated (0%) | “Security Council Diamond Sanctions and the Kimberley Process,” Security Council Report, September 28, 2006. | “Security Council Diamond Sanctions and the Kimberley Process,” Security Council Report, September 28, 2006. |
| 335dd0d2ebc-4199-434a-a2c1-70e248b2e8b5 | Not Translated (0%) | Protecting the Financial System from International Criminals | Protecting the Financial System from International Criminals |
| 3365ab65ccc-bac7-4ad8-82a9-734b8e8ab56e | Not Translated (0%) | Sanctions may be used to protect the financial system from international criminals. | Sanctions may be used to protect the financial system from international criminals. |
| 3375ab65ccc-bac7-4ad8-82a9-734b8e8ab56e | Not Translated (0%) | Criminals are not limited by geography as governments often are. | Criminals are not limited by geography as governments often are. |
| 3385ab65ccc-bac7-4ad8-82a9-734b8e8ab56e | Not Translated (0%) | Sanctions can be imposed to influence actions that lead to a reduction of money laundering, terrorist financing, and the trafficking of illegal goods by reducing the flow of funds. | Sanctions can be imposed to influence actions that lead to a reduction of money laundering, terrorist financing, and the trafficking of illegal goods by reducing the flow of funds. |
| 3395ab65ccc-bac7-4ad8-82a9-734b8e8ab56e | Not Translated (0%) | A sanction might aim to prevent corrupt officials from embezzling and from accessing financial services in order to illegally launder money taken while they were ruling their country. | A sanction might aim to prevent corrupt officials from embezzling and from accessing financial services in order to illegally launder money taken while they were ruling their country. |
| 3405896b4d7-aaec-43c6-9f14-a0386622f6b6 | Not Translated (0%) | Then there is the matter of using US currency. | Then there is the matter of using US currency. |
| 3415896b4d7-aaec-43c6-9f14-a0386622f6b6 | Not Translated (0%) | The USA PATRIOT Act of 2001 establishes rules about deposits made into foreign bank accounts. | The USA PATRIOT Act of 2001 establishes rules about deposits made into foreign bank accounts. |
| 3425896b4d7-aaec-43c6-9f14-a0386622f6b6 | Not Translated (0%) | The law states that funds deposited in a foreign bank are subject to US jurisdiction if that foreign bank has an interbank account in the US as well. | The law states that funds deposited in a foreign bank are subject to US jurisdiction if that foreign bank has an interbank account in the US as well. |
| 3435896b4d7-aaec-43c6-9f14-a0386622f6b6 | Not Translated (0%) | This is because the US considers the overseas deposited funds to also make up part of those interbank funds. | This is because the US considers the overseas deposited funds to also make up part of those interbank funds. |
| 3440fe9af19-55b7-412e-9937-70bb91ec7b79 | Not Translated (0%) | While it is probably not true that all of the overseas deposits make it into the interbank account in the US, the US utilizes this approach to be able to exert jurisdiction over otherwise unreachable funds even if the interbank funds cannot be traced directly back to the funds that were originally deposited. | While it is probably not true that all of the overseas deposits make it into the interbank account in the US, the US utilizes this approach to be able to exert jurisdiction over otherwise unreachable funds even if the interbank funds cannot be traced directly back to the funds that were originally deposited. |
| 345c88ec949-aa0c-4eaf-b890-3d29cc2bbe30 | Not Translated (0%) | This means that the assets of the foreign bank located at the US bank may be subject to forfeiture if the foreign bank or one of its customers is involved in violations of sanctions or in other criminal activity, even if the activity does not directly relate to the foreign bank’s deposits in the US. | This means that the assets of the foreign bank located at the US bank may be subject to forfeiture if the foreign bank or one of its customers is involved in violations of sanctions or in other criminal activity, even if the activity does not directly relate to the foreign bank’s deposits in the US. |
| 346c88ec949-aa0c-4eaf-b890-3d29cc2bbe30 | Not Translated (0%) | The law applies regardless of the foreign bank’s location. | The law applies regardless of the foreign bank’s location. |
| 347cfaddede-7e5e-4c36-a1f4-a0fb60ed26dd | Not Translated (0%) | Terrorism-Related Sanctions | Terrorism-Related Sanctions |
| 348e40ea544-6203-4f2b-87d5-00872ad87d59 | Not Translated (0%) | In 1999, as a response to the bombing of the US Embassies in Kenya and Tanzania, the United Nations Security Council established a sanctions regime (Resolution UNSCR 1267) that targeted individuals and entities affiliated with Al-Qaeda and the Taliban. | In 1999, as a response to the bombing of the US Embassies in Kenya and Tanzania, the United Nations Security Council established a sanctions regime (Resolution UNSCR 1267) that targeted individuals and entities affiliated with Al-Qaeda and the Taliban. |
| 349e40ea544-6203-4f2b-87d5-00872ad87d59 | Not Translated (0%) | These sanctions continue to exist and were expanded in 2014 to include individuals and entities affiliated to ISIS, also known as ISIL or Da’esh. | These sanctions continue to exist and were expanded in 2014 to include individuals and entities affiliated to ISIS, also known as ISIL or Da’esh. |
| 3501df573c0-03da-4caf-a830-c3d5d3e6486e | Not Translated (0%) | Also in 1999, the UN General Assembly adopted the International Convention for the Suppression of the Financing of Terrorism. | Also in 1999, the UN General Assembly adopted the International Convention for the Suppression of the Financing of Terrorism. |
| 3511df573c0-03da-4caf-a830-c3d5d3e6486e | Not Translated (0%) | The treaty criminalizes the financing of terrorism and calls for international cooperation in the detecting and freezing of assets that are used, or intended for use, to finance terrorism. | The treaty criminalizes the financing of terrorism and calls for international cooperation in the detecting and freezing of assets that are used, or intended for use, to finance terrorism. |
| 3521df573c0-03da-4caf-a830-c3d5d3e6486e | Not Translated (0%) | All signatories to the treaty are required to penalize, take into custody, prosecute and, where required, extradite offenders. | All signatories to the treaty are required to penalize, take into custody, prosecute and, where required, extradite offenders. |
| 3531df573c0-03da-4caf-a830-c3d5d3e6486e | Not Translated (0%) | Although not a sanction, the treaty is one of the most widely accepted treaties in history and imposes international obligations on signatories. | Although not a sanction, the treaty is one of the most widely accepted treaties in history and imposes international obligations on signatories. |
| 3544fee2897-4781-4143-a2d5-8844e825e204 | Not Translated (0%) | Following the attacks of September 11, 2001, the UN passed UNSCR 1373, which obliged all Member States of the United Nations to sanction terrorist activity. | Following the attacks of September 11, 2001, the UN passed UNSCR 1373, which obliged all Member States of the United Nations to sanction terrorist activity. |
| 3554fee2897-4781-4143-a2d5-8844e825e204 | Not Translated (0%) | Subsequent resolutions (e.g., 1624 in 2005, 2396 in 2017, and 2462 in 2019) have built on UNSCR 1373 for the purposes of countering terrorist financing. | Subsequent resolutions (e.g., 1624 in 2005, 2396 in 2017, and 2462 in 2019) have built on UNSCR 1373 for the purposes of countering terrorist financing. |
| 356f7ba3fc7-1bb7-4728-98ae-4273b743b7c9 | Not Translated (0%) | While actual terrorist acts may be relatively inexpensive, terrorist organizations require funding for the purposes of training, recruiting, and paying out stipends to terrorists and their surviving family members. | While actual terrorist acts may be relatively inexpensive, terrorist organizations require funding for the purposes of training, recruiting, and paying out stipends to terrorists and their surviving family members. |
| 35785a82477-6a85-4642-90e6-6f754b887286 | Not Translated (0%) | Members of the US government suggested after the September 11 attacks that economic sanctions would play an equally important part in the war on terrorism as war itself. | Members of the US government suggested after the September 11 attacks that economic sanctions would play an equally important part in the war on terrorism as war itself. |
| 35888551db6-92f1-4ecb-8e47-00ececc38bab | Not Translated (0%) | Gary Clyde Hufbauer, Jeffrey J. Schott, and Barbara Oegg, “Using Sanctions to Fight Terrorism,” Peterson Institute for International Economics, November 2001. | Gary Clyde Hufbauer, Jeffrey J. Schott, and Barbara Oegg, “Using Sanctions to Fight Terrorism,” Peterson Institute for International Economics, November 2001. |
| 3591bbd9805-617b-41d0-9ee0-f5e2b4acbcb8 | Not Translated (0%) | Although terrorist groups will generally not be dissuaded from pursuing their agendas based on sanctions, the use of economic sanctions may dissuade states from providing refuge and material support to terrorist groups. | Although terrorist groups will generally not be dissuaded from pursuing their agendas based on sanctions, the use of economic sanctions may dissuade states from providing refuge and material support to terrorist groups. |
| 3607abd5e2b-676c-4f25-a6d2-c95c43c70732 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 3617abd5e2b-676c-4f25-a6d2-c95c43c70732 | Not Translated (0%) | SANCTIONS AGAINST SUDAN 1996–2001 | SANCTIONS AGAINST SUDAN 1996–2001 |
| 362e29d8671-1c69-4975-a7b7-6ac07c6fb3ea | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 363a12a79bf-ea3b-4c42-b62c-b031c73acb74 | Not Translated (0%) | In 1996 the United Nations Security Council issued Resolution 1054, which imposed sanctions against Sudan due to its government’s involvement in supporting international terrorist groups, including hosting Osama bin Laden and a number of his close entourage. | In 1996 the United Nations Security Council issued Resolution 1054, which imposed sanctions against Sudan due to its government’s involvement in supporting international terrorist groups, including hosting Osama bin Laden and a number of his close entourage. |
| 364a12a79bf-ea3b-4c42-b62c-b031c73acb74 | Not Translated (0%) | The Security Council decided that countries should impose limitations both on diplomatic representation with Sudan and on the movement of Sudanese dignitaries abroad. | The Security Council decided that countries should impose limitations both on diplomatic representation with Sudan and on the movement of Sudanese dignitaries abroad. |
| 365a12a79bf-ea3b-4c42-b62c-b031c73acb74 | Not Translated (0%) | Later, the Security Council expanded the sanctions to include restrictions on the flights of Sudanese officials and aircrafts run by the national air carrier. | Later, the Security Council expanded the sanctions to include restrictions on the flights of Sudanese officials and aircrafts run by the national air carrier. |
| 366a12a79bf-ea3b-4c42-b62c-b031c73acb74 | Not Translated (0%) | As a result of these sanctions, the Sudanese government suffered economic losses and was not able to attract international investments to its nascent petroleum industry. | As a result of these sanctions, the Sudanese government suffered economic losses and was not able to attract international investments to its nascent petroleum industry. |
| 367a12a79bf-ea3b-4c42-b62c-b031c73acb74 | Not Translated (0%) | The sanctions were lifted in 2001 after Sudan acceded to all international treaties related to counterterrorism and ordered the expulsion of bin Laden and his followers. | The sanctions were lifted in 2001 after Sudan acceded to all international treaties related to counterterrorism and ordered the expulsion of bin Laden and his followers. |
| 3683f84cbf9-8404-473e-a046-2dbf0d35d939 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 3694d679434-8bf9-4381-b5bf-f194526320dd | Not Translated (0%) | Sanctions can be used to provide incentives that reduce state support of terrorism. | Sanctions can be used to provide incentives that reduce state support of terrorism. |
| 37097f6f344-f5ce-414f-bf63-a95ab1a663bf | Not Translated (0%) | The impact of sanctions is not always immediate. | The impact of sanctions is not always immediate. |
| 371fea57b07-fcf6-4004-bd79-de2105b34eef | Not Translated (0%) | Misappropriation of State Resources | Misappropriation of State Resources |
| 3721533bf74-9a6a-464f-aa2d-72cdc32c4433 | Not Translated (0%) | Another purpose behind sanctions is to freeze and return resources that have been misappropriated by kleptocrats. | Another purpose behind sanctions is to freeze and return resources that have been misappropriated by kleptocrats. |
| 3731533bf74-9a6a-464f-aa2d-72cdc32c4433 | Not Translated (0%) | A kleptocrat is a corrupt leader who exploits the people and resources of a state for personal gain. | A kleptocrat is a corrupt leader who exploits the people and resources of a state for personal gain. |
| 374afd3a691-8a3f-415c-a0f6-3c0a38855f62 | Not Translated (0%) | The EU has sanctioned kleptocrats in relation to Tunisia, Egypt after the Arab Spring, and Ukraine. | The EU has sanctioned kleptocrats in relation to Tunisia, Egypt after the Arab Spring, and Ukraine. |
| 3759aef9239-a86f-4ab9-98ee-0181f19100b7 | Not Translated (0%) | Who Imposes Sanctions? | Who Imposes Sanctions? |
| 37627b76526-652b-4009-aae6-776a8a7adff4 | Not Translated (0%) | Governments and intergovernmental organizations, such as the UN and the EU, impose (i.e., create) sanctions through the passing of laws and regulations. | Governments and intergovernmental organizations, such as the UN and the EU, impose (i.e., create) sanctions through the passing of laws and regulations. |
| 37727b76526-652b-4009-aae6-776a8a7adff4 | Not Translated (0%) | These laws and regulations may also be called “resolutions” in the case of the UN and “restrictive measures” in the case of the EU. | These laws and regulations may also be called “resolutions” in the case of the UN and “restrictive measures” in the case of the EU. |
| 37827b76526-652b-4009-aae6-776a8a7adff4 | Not Translated (0%) | No matter what they are called, they are sanctions. | No matter what they are called, they are sanctions. |
| 37927b76526-652b-4009-aae6-776a8a7adff4 | Not Translated (0%) | However, at this stage, these sanctions are merely embodied in paper and still need to be enforced. | However, at this stage, these sanctions are merely embodied in paper and still need to be enforced. |
| 3804ba68806-0659-4b99-9348-1594d40a45db | Not Translated (0%) | While intergovernmental organizations impose sanctions, they are not often the enforcers of sanctions, i.e., the function that monitors and ensures compliance with sanctions. | While intergovernmental organizations impose sanctions, they are not often the enforcers of sanctions, i.e., the function that monitors and ensures compliance with sanctions. |
| 3814ba68806-0659-4b99-9348-1594d40a45db | Not Translated (0%) | The intergovernmental organizations leave it to member nations and organizations to further adopt and create methods to enforce these sanctions domestically. | The intergovernmental organizations leave it to member nations and organizations to further adopt and create methods to enforce these sanctions domestically. |
| 3824ba68806-0659-4b99-9348-1594d40a45db | Not Translated (0%) | Governments that impose their own sanctions may have one government body pass the legislation and another government body monitor or enforce the legislation. | Governments that impose their own sanctions may have one government body pass the legislation and another government body monitor or enforce the legislation. |
| 3834ba68806-0659-4b99-9348-1594d40a45db | Not Translated (0%) | This is the case in the US, where the legislative body, Congress, may impose sanctions through the passage of a sanctions bill, and then those sanctions are enforced through various agencies, federal regulators, and even through the enlistment of state regulators. | This is the case in the US, where the legislative body, Congress, may impose sanctions through the passage of a sanctions bill, and then those sanctions are enforced through various agencies, federal regulators, and even through the enlistment of state regulators. |
| 3844ba68806-0659-4b99-9348-1594d40a45db | Not Translated (0%) | Moreover, the obligation to enforce sanctions may cascade down to non-government actors, as is the case with financial institutions. | Moreover, the obligation to enforce sanctions may cascade down to non-government actors, as is the case with financial institutions. |
| 3854c95936c-f557-4fc2-93e9-70a3a842e50a | Not Translated (0%) | Often governments that adopt sanctions will establish a regulatory body, such as a bank examiner, to visit and examine banks in order to determine whether they are taking necessary steps to ensure they are not engaging in sanctioned activity. | Often governments that adopt sanctions will establish a regulatory body, such as a bank examiner, to visit and examine banks in order to determine whether they are taking necessary steps to ensure they are not engaging in sanctioned activity. |
| 3864c95936c-f557-4fc2-93e9-70a3a842e50a | Not Translated (0%) | These bank examiners may in turn discover sanctioned activity that leads to fines and penalties. | These bank examiners may in turn discover sanctioned activity that leads to fines and penalties. |
| 387afa8f779-8d6c-4e4b-a7a6-a2e852e69523 | Not Translated (0%) | More often than not, sanctions are imposed by larger, wealthier states against smaller, developing states. | More often than not, sanctions are imposed by larger, wealthier states against smaller, developing states. |
| 388afa8f779-8d6c-4e4b-a7a6-a2e852e69523 | Not Translated (0%) | Sanctions have also been found to be more effective when carried out by countries that are geographically and economically close to the target, but that have a GDP at least 10 times larger than that of the target. | Sanctions have also been found to be more effective when carried out by countries that are geographically and economically close to the target, but that have a GDP at least 10 times larger than that of the target. |
| 389afa8f779-8d6c-4e4b-a7a6-a2e852e69523 | Not Translated (0%) | In other words, larger, more powerful countries “win” when it comes to sanctions. | In other words, larger, more powerful countries “win” when it comes to sanctions. |
| 390b06472b8-95ff-45a8-ae32-f3194f2094c4 | Not Translated (0%) | Globalization | Globalization |
| 39169485a48-f6a6-45eb-9b39-3869cc6a0e3b | Not Translated (0%) | The effectiveness of sanctions is often determined by the number of participating countries. | The effectiveness of sanctions is often determined by the number of participating countries. |
| 39269485a48-f6a6-45eb-9b39-3869cc6a0e3b | Not Translated (0%) | This is especially true due to globalization. | This is especially true due to globalization. |
| 39369485a48-f6a6-45eb-9b39-3869cc6a0e3b | Not Translated (0%) | Globalization weakens sanctions because a globalized market makes it easier to replace and reroute trade channels. | Globalization weakens sanctions because a globalized market makes it easier to replace and reroute trade channels. |
| 39469485a48-f6a6-45eb-9b39-3869cc6a0e3b | Not Translated (0%) | Because of the expanding market, countries acting on their own without international support have become much less effective, especially as the global economic power of those countries diminishes. | Because of the expanding market, countries acting on their own without international support have become much less effective, especially as the global economic power of those countries diminishes. |
| 39569485a48-f6a6-45eb-9b39-3869cc6a0e3b | Not Translated (0%) | If a country’s trade is cut off in one way, the country will find another way to get what it wants. | If a country’s trade is cut off in one way, the country will find another way to get what it wants. |
| 39669485a48-f6a6-45eb-9b39-3869cc6a0e3b | Not Translated (0%) | One way to stop these leaks is for countries to work together as a group in order to cut off the target from every side. | One way to stop these leaks is for countries to work together as a group in order to cut off the target from every side. |
| 39769485a48-f6a6-45eb-9b39-3869cc6a0e3b | Not Translated (0%) | It should be noted that because sanctions are a matter of foreign policy, nations may vary in their level of commitment to sanctions enforcement. | It should be noted that because sanctions are a matter of foreign policy, nations may vary in their level of commitment to sanctions enforcement. |
| 39858e10ff4-afeb-4c6c-be89-ea99ecdfc13d | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 39958e10ff4-afeb-4c6c-be89-ea99ecdfc13d | Not Translated (0%) | QUEENSLAND MINES | QUEENSLAND MINES |
| 4003ef4fc7f-0f68-46ae-b26b-833ffc6c0761 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 401c3a88862-6b78-4443-b42e-d9c5cb76e999 | Not Translated (0%) | Australia implemented unilateral sanctions from 1983 to 1986 when it ceased allowing shipments of uranium to France. | Australia implemented unilateral sanctions from 1983 to 1986 when it ceased allowing shipments of uranium to France. |
| 402c3a88862-6b78-4443-b42e-d9c5cb76e999 | Not Translated (0%) | Australia used these sanctions in an attempt to get France to halt testing nuclear weapons in the South Pacific. | Australia used these sanctions in an attempt to get France to halt testing nuclear weapons in the South Pacific. |
| 403c3a88862-6b78-4443-b42e-d9c5cb76e999 | Not Translated (0%) | These unilateral sanctions were ineffective because in 1984 the price of uranium oxide decreased by nearly 50% in the world market, and France was able to easily (and more cheaply) replace or reroute this trade channel. | These unilateral sanctions were ineffective because in 1984 the price of uranium oxide decreased by nearly 50% in the world market, and France was able to easily (and more cheaply) replace or reroute this trade channel. |
| 404c3a88862-6b78-4443-b42e-d9c5cb76e999 | Not Translated (0%) | Because of globalization, these unilateral sanctions were ineffective, and in fact actually caused more harm to Australia. | Because of globalization, these unilateral sanctions were ineffective, and in fact actually caused more harm to Australia. |
| 405c3a88862-6b78-4443-b42e-d9c5cb76e999 | Not Translated (0%) | The Australian government paid AU$26 million to the Queensland Mines, which contracted with France, to cover the losses the company suffered because of its prohibited deals. | The Australian government paid AU$26 million to the Queensland Mines, which contracted with France, to cover the losses the company suffered because of its prohibited deals. |
| 406bea553cd-fd99-4d82-8120-4e4564b6fcab | Not Translated (0%) | 15 Elliot, Hufbauer, and Oegg, 2. | 15 Elliot, Hufbauer, and Oegg, 2. |
| 407e3d884d5-2a44-43b6-9ac2-aa10ca551075 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 4088d39ca27-b0a1-488f-af06-42758c8325b2 | Not Translated (0%) | Globalization weakens the effectiveness of unilateral sanctions as replacement goods are more easily found. | Globalization weakens the effectiveness of unilateral sanctions as replacement goods are more easily found. |
| 409de1eca73-2ce5-4252-a288-2bebd7665b29 | Not Translated (0%) | This leads to an important sanctions framework—that of unilateral sanctions versus multilateral sanctions. | This leads to an important sanctions framework—that of unilateral sanctions versus multilateral sanctions. |
| 410de1eca73-2ce5-4252-a288-2bebd7665b29 | Not Translated (0%) | The United States is most known for its unilateral sanctions. | The United States is most known for its unilateral sanctions. |
| 411de1eca73-2ce5-4252-a288-2bebd7665b29 | Not Translated (0%) | Multilateral sanctions are sanctions supported by more than one country. | Multilateral sanctions are sanctions supported by more than one country. |
| 412de1eca73-2ce5-4252-a288-2bebd7665b29 | Not Translated (0%) | The UN is the best example of multiple countries acting together to enforce a sanctions regime. | The UN is the best example of multiple countries acting together to enforce a sanctions regime. |
| 413dbd336dc-0397-41c9-8637-ec8925321bed | Not Translated (0%) | Included within this framework are autonomous sanctions. | Included within this framework are autonomous sanctions. |
| 414dbd336dc-0397-41c9-8637-ec8925321bed | Not Translated (0%) | Autonomous sanctions occur when a single entity, whether a government, such as Australia, or a coalition of governments, such as the EU, acts to enforce a sanctions regime. | Autonomous sanctions occur when a single entity, whether a government, such as Australia, or a coalition of governments, such as the EU, acts to enforce a sanctions regime. |
| 415dbd336dc-0397-41c9-8637-ec8925321bed | Not Translated (0%) | Because multilateral sanctions require a broader consensus among nations that may have different interests, for example, among the five permanent members of the UN Security Council, most countries have their own version of autonomous, unilateral sanctions. | Because multilateral sanctions require a broader consensus among nations that may have different interests, for example, among the five permanent members of the UN Security Council, most countries have their own version of autonomous, unilateral sanctions. |
| 41628b76e1a-a6c7-4bf3-96ce-f9758bb9508d | Not Translated (0%) | However, the EU, which is a collection of nations, also has its autonomous sanctions. | However, the EU, which is a collection of nations, also has its autonomous sanctions. |
| 41728b76e1a-a6c7-4bf3-96ce-f9758bb9508d | Not Translated (0%) | These occur when its Council decides to impose sanctions on its own initiative. | These occur when its Council decides to impose sanctions on its own initiative. |
| 41828b76e1a-a6c7-4bf3-96ce-f9758bb9508d | Not Translated (0%) | While most countries in the EU do not rely on autonomous sanctions, choosing instead to rely on the EU framework, EU member countries, in turn, can have their own autonomous sanctions, such as when Latvia passed a version of the US’s Magnitsky Act in 2018, imposing travel restrictions on 49 Russian citizens. | While most countries in the EU do not rely on autonomous sanctions, choosing instead to rely on the EU framework, EU member countries, in turn, can have their own autonomous sanctions, such as when Latvia passed a version of the US’s Magnitsky Act in 2018, imposing travel restrictions on 49 Russian citizens. |
| 419ad59898b-8fdd-4b86-b520-241a3728dd62 | Not Translated (0%) | “Latvia Becomes Final Baltic State to Pass Magnitsky Law,” Organized Crime and Corruption Reporting Project, February 9, 2018. | “Latvia Becomes Final Baltic State to Pass Magnitsky Law,” Organized Crime and Corruption Reporting Project, February 9, 2018. |
| 420a166dd4f-1606-4997-a5f3-1774f8dc6b4f | Not Translated (0%) | While countries can choose to pursue sanctions on their own, history has shown that multilateral sanctions are more effective. | While countries can choose to pursue sanctions on their own, history has shown that multilateral sanctions are more effective. |
| 421a166dd4f-1606-4997-a5f3-1774f8dc6b4f | Not Translated (0%) | Recognizing the greater effectiveness of multilateral sanctions, countries have come together to form intergovernmental organizations. | Recognizing the greater effectiveness of multilateral sanctions, countries have come together to form intergovernmental organizations. |
| 422a166dd4f-1606-4997-a5f3-1774f8dc6b4f | Not Translated (0%) | However, the United States continues to pursue unilateral sanctions. | However, the United States continues to pursue unilateral sanctions. |
| 4238ac5386a-e9be-43ae-bee2-f6c26ae88699 | Not Translated (0%) | The primary states and organizations imposing sanctions are as follows: | The primary states and organizations imposing sanctions are as follows: |
| 424199a7e66-073e-40be-9646-b9a0230ea635 | Not Translated (0%) | United Nations (UN) (multilateral) | United Nations (UN) (multilateral) |
| 4254cf57619-775f-4fe2-95ff-357cfee91260 | Not Translated (0%) | United States (US) (unilateral) | United States (US) (unilateral) |
| 4266f661201-1cbd-441a-aece-276c3c2b7821 | Not Translated (0%) | European Union (EU) (multilateral) | European Union (EU) (multilateral) |
| 427e6357353-36f2-4c8a-9a04-dc33f13e4028 | Not Translated (0%) | United Nations | United Nations |
| 4286f2da000-dacd-4c00-a08a-b3553594944a | Not Translated (0%) | The UN uses sanctions as a measure to achieve international peace and security based on Article 41 of Chapter VII of its founding charter. | The UN uses sanctions as a measure to achieve international peace and security based on Article 41 of Chapter VII of its founding charter. |
| 4296f2da000-dacd-4c00-a08a-b3553594944a | Not Translated (0%) | The UN first imposed sanctions in 1963 and 1965 against the apartheid regimes of South Africa and Southern Rhodesia, respectively. | The UN first imposed sanctions in 1963 and 1965 against the apartheid regimes of South Africa and Southern Rhodesia, respectively. |
| 4306f2da000-dacd-4c00-a08a-b3553594944a | Not Translated (0%) | But at the end of the Cold War, the UN witnessed a surge in sanctions regimes, the objectives of which covered conflict resolution, nonproliferation, counterterrorism, democratization, and the protection of civilians. | But at the end of the Cold War, the UN witnessed a surge in sanctions regimes, the objectives of which covered conflict resolution, nonproliferation, counterterrorism, democratization, and the protection of civilians. |
| 431ee485b4e-90c2-4007-9af2-11aff453a404 | Not Translated (0%) | The Security Council has set some key criteria for targeting individuals and entities. | The Security Council has set some key criteria for targeting individuals and entities. |
| 432ee485b4e-90c2-4007-9af2-11aff453a404 | Not Translated (0%) | Among those criteria are: | Among those criteria are: |
| 43391333abd-efa9-4112-b393-503f3ed7908b | Not Translated (0%) | Threats to peace, security, or stability | Threats to peace, security, or stability |
| 434db92d4f2-b199-46f6-87e8-0f25c968aada | Not Translated (0%) | Violations of human rights and international humanitarian law | Violations of human rights and international humanitarian law |
| 435be343ddf-8b5f-4370-9697-5fd5f4b9a4f5 | Not Translated (0%) | Obstructing humanitarian aid | Obstructing humanitarian aid |
| 436c6e98372-794f-4e4b-9057-20d3afd7f7bd | Not Translated (0%) | Recruiting or using children in armed conflicts | Recruiting or using children in armed conflicts |
| 43782949801-ed28-485b-ae86-c4fa055f8ed2 | Not Translated (0%) | United Nations Security Council, Subsidiary Organs of the United Nations Security Council, 2019. | United Nations Security Council, Subsidiary Organs of the United Nations Security Council, 2019. |
| 438aec9a087-fe93-4bb6-ace3-72c87a9ba828 | Not Translated (0%) | The UN prefers targeted sanctions (sanctions against a specific person) over comprehensive sanctions against a country or region because the latter have greater impact on developing economies. | The UN prefers targeted sanctions (sanctions against a specific person) over comprehensive sanctions against a country or region because the latter have greater impact on developing economies. |
| 439aec9a087-fe93-4bb6-ace3-72c87a9ba828 | Not Translated (0%) | Civilians, particularly women and children, in those areas are already vulnerable due to being economically disadvantaged. | Civilians, particularly women and children, in those areas are already vulnerable due to being economically disadvantaged. |
| 440f8cd11fe-e75d-4e25-9ee4-bbe6573e926d | Not Translated (0%) | American Center for Law and Justice, Procedures to Impose Sanctions Under the UN Charter, 2011. | American Center for Law and Justice, Procedures to Impose Sanctions Under the UN Charter, 2011. |
| 4411950bb05-a088-439f-af7d-23e3dcd2ed20 | Not Translated (0%) | Multilateral sanctions are more difficult to enact as they require more countries to have the same foreign policy objectives. | Multilateral sanctions are more difficult to enact as they require more countries to have the same foreign policy objectives. |
| 4421950bb05-a088-439f-af7d-23e3dcd2ed20 | Not Translated (0%) | During the Cold War, the US and Russia were often at odds with each other, so enacting sanctions in the UN was more difficult. | During the Cold War, the US and Russia were often at odds with each other, so enacting sanctions in the UN was more difficult. |
| 4431950bb05-a088-439f-af7d-23e3dcd2ed20 | Not Translated (0%) | During the period between 1978 and 1981 when the Soviet Union completed a nuclear research reactor in Tajoura, the US named Libya as a state sponsor of terrorism. | During the period between 1978 and 1981 when the Soviet Union completed a nuclear research reactor in Tajoura, the US named Libya as a state sponsor of terrorism. |
| 4441950bb05-a088-439f-af7d-23e3dcd2ed20 | Not Translated (0%) | With the thawing of the Cold War, the UN Security Council, which included both Russia and the US, adopted Resolution 748. | With the thawing of the Cold War, the UN Security Council, which included both Russia and the US, adopted Resolution 748. |
| 4451950bb05-a088-439f-af7d-23e3dcd2ed20 | Not Translated (0%) | The resolution imposed sanctions on Libya, including an arms embargo and travel restrictions. | The resolution imposed sanctions on Libya, including an arms embargo and travel restrictions. |
| 446c216c24f-f269-4f06-ac0f-530cd46bf9ea | Not Translated (0%) | Arms Control Association, 2018. | Arms Control Association, 2018. |
| 447b45d75d3-4967-477c-85fd-7f4ebe6f1d5c | Not Translated (0%) | The UN Security Council consists of 15 member countries, of which five countries (Russia, US, UK, China, and France) are permanent members. | The UN Security Council consists of 15 member countries, of which five countries (Russia, US, UK, China, and France) are permanent members. |
| 448b45d75d3-4967-477c-85fd-7f4ebe6f1d5c | Not Translated (0%) | Each member country has one vote, and to enact sanctions resolutions, at least nine members, including all permanent members, must vote in the affirmative, without objection from any of the five permanent members. | Each member country has one vote, and to enact sanctions resolutions, at least nine members, including all permanent members, must vote in the affirmative, without objection from any of the five permanent members. |
| 449b45d75d3-4967-477c-85fd-7f4ebe6f1d5c | Not Translated (0%) | Effectively each permanent member has a veto. | Effectively each permanent member has a veto. |
| 450dde8a14e-97c4-43ad-8eb6-6adc3e9b90ce | Not Translated (0%) | After the UN Security Council adopts a resolution, it is legally binding under Articles 25 and 48 of the UN Charter. | After the UN Security Council adopts a resolution, it is legally binding under Articles 25 and 48 of the UN Charter. |
| 451dde8a14e-97c4-43ad-8eb6-6adc3e9b90ce | Not Translated (0%) | Article 25 states that Member States are obligated to “accept and carry out the decisions of the Security Council in accordance with the present Charter.” | Article 25 states that Member States are obligated to “accept and carry out the decisions of the Security Council in accordance with the present Charter.” |
| 452dde8a14e-97c4-43ad-8eb6-6adc3e9b90ce | Not Translated (0%) | After passing a resolution, the UN establishes a sanctions committee to monitor the implementation and effectiveness of the sanctions regime. | After passing a resolution, the UN establishes a sanctions committee to monitor the implementation and effectiveness of the sanctions regime. |
| 453dde8a14e-97c4-43ad-8eb6-6adc3e9b90ce | Not Translated (0%) | If the resolution proves to be insufficient in achieving its aims, the UN Security Council, under Article 42 of the UN Charter, “may take such action by air, sea, or land forces as may be necessary to maintain or restore international peace and security,” including blockades. | If the resolution proves to be insufficient in achieving its aims, the UN Security Council, under Article 42 of the UN Charter, “may take such action by air, sea, or land forces as may be necessary to maintain or restore international peace and security,” including blockades. |
| 4546ce9f26c-c9fd-4008-86e4-bcc0dfa9fbcd | Not Translated (0%) | American Center for Law and Justice, 2011. | American Center for Law and Justice, 2011. |
| 4552f71c483-a978-4324-b76b-cca5748cac87 | Not Translated (0%) | Article 48 of the Charter constitutes an affirmation of Member States’ obligation under Article 25 of the Charter to accept binding decisions by the Council. | Article 48 of the Charter constitutes an affirmation of Member States’ obligation under Article 25 of the Charter to accept binding decisions by the Council. |
| 4562f71c483-a978-4324-b76b-cca5748cac87 | Not Translated (0%) | Article 48 (1) allows the Council to limit such duties to selected Members, and (2) makes an attempt to co-opt other international organizations into the United Nations peacekeeping system. | Article 48 (1) allows the Council to limit such duties to selected Members, and (2) makes an attempt to co-opt other international organizations into the United Nations peacekeeping system. |
| 45770bf67ea-2300-4710-b0a6-80f52d47d6b4 | Not Translated (0%) | While the UN passes sanctions, Member States are expected to implement and enforce these sanctions. | While the UN passes sanctions, Member States are expected to implement and enforce these sanctions. |
| 45870bf67ea-2300-4710-b0a6-80f52d47d6b4 | Not Translated (0%) | Member States pass their own laws and enforcement regulations as well as create their own enforcement bodies, such as bank regulators and government agencies. | Member States pass their own laws and enforcement regulations as well as create their own enforcement bodies, such as bank regulators and government agencies. |
| 45970bf67ea-2300-4710-b0a6-80f52d47d6b4 | Not Translated (0%) | Through monitoring and reporting, these regulators ensure that private institutions, such as financial institutions and businesses, act within the sanctions regulations. | Through monitoring and reporting, these regulators ensure that private institutions, such as financial institutions and businesses, act within the sanctions regulations. |
| 460546943ef-2b60-4543-9606-38e78579aeb2 | Not Translated (0%) | United States | United States |
| 461251812b3-af83-41d3-9237-b25e042581be | Not Translated (0%) | The US has more sanctions regulations than any other country. | The US has more sanctions regulations than any other country. |
| 462251812b3-af83-41d3-9237-b25e042581be | Not Translated (0%) | The US president is given broad authority to impose sanctions under an act of Congress, such as the International Emergency Economic Powers Act (IEEPA) or the Trading with the Enemy Act (TWEA). | The US president is given broad authority to impose sanctions under an act of Congress, such as the International Emergency Economic Powers Act (IEEPA) or the Trading with the Enemy Act (TWEA). |
| 463251812b3-af83-41d3-9237-b25e042581be | Not Translated (0%) | Under the act, the president imposes sanctions by executive order (e.g., Executive Order 13622 authorizing Iran sanctions based on the IEEPA authority). | Under the act, the president imposes sanctions by executive order (e.g., Executive Order 13622 authorizing Iran sanctions based on the IEEPA authority). |
| 464251812b3-af83-41d3-9237-b25e042581be | Not Translated (0%) | Statutes and executive orders are then further implemented by enacting regulations. | Statutes and executive orders are then further implemented by enacting regulations. |
| 465251812b3-af83-41d3-9237-b25e042581be | Not Translated (0%) | The acts passed by Congress do not confer unlimited authority to the president to impose sanctions. | The acts passed by Congress do not confer unlimited authority to the president to impose sanctions. |
| 466251812b3-af83-41d3-9237-b25e042581be | Not Translated (0%) | As implied by its name, the IEEPA, like other acts, empowers the president during a state of emergency. | As implied by its name, the IEEPA, like other acts, empowers the president during a state of emergency. |
| 467251812b3-af83-41d3-9237-b25e042581be | Not Translated (0%) | Under the US sanctions regime, the president must follow reporting requirements imposed by Congress and track costs. | Under the US sanctions regime, the president must follow reporting requirements imposed by Congress and track costs. |
| 468251812b3-af83-41d3-9237-b25e042581be | Not Translated (0%) | The president must also review and extend the emergency each year. | The president must also review and extend the emergency each year. |
| 469251812b3-af83-41d3-9237-b25e042581be | Not Translated (0%) | Congress may terminate an emergency through a joint resolution. | Congress may terminate an emergency through a joint resolution. |
| 470011c0c7b-52f2-46e8-8ac3-c027aafcee58 | Not Translated (0%) | The Office of Foreign Assets Control (OFAC) is the agency within the Department of the Treasury responsible for implementing the financial sanctions. | The Office of Foreign Assets Control (OFAC) is the agency within the Department of the Treasury responsible for implementing the financial sanctions. |
| 471011c0c7b-52f2-46e8-8ac3-c027aafcee58 | Not Translated (0%) | It may work in consultation with other agencies, such as the Department of State. | It may work in consultation with other agencies, such as the Department of State. |
| 472011c0c7b-52f2-46e8-8ac3-c027aafcee58 | Not Translated (0%) | A core component of OFAC sanctions is the Specially Designated Nationals and Blocked Persons list, or SDN list. | A core component of OFAC sanctions is the Specially Designated Nationals and Blocked Persons list, or SDN list. |
| 473011c0c7b-52f2-46e8-8ac3-c027aafcee58 | Not Translated (0%) | The SDN list contains the names and identifiers of individuals, companies, vessels, and other entities whose assets are to be blocked or frozen. | The SDN list contains the names and identifiers of individuals, companies, vessels, and other entities whose assets are to be blocked or frozen. |
| 474d4e4f835-f001-499b-8531-158785c763ba | Not Translated (0%) | Additionally, the US has the Bureau of Industry and Security (BIS). | Additionally, the US has the Bureau of Industry and Security (BIS). |
| 475d4e4f835-f001-499b-8531-158785c763ba | Not Translated (0%) | The BIS is within the Department of Commerce. | The BIS is within the Department of Commerce. |
| 476d4e4f835-f001-499b-8531-158785c763ba | Not Translated (0%) | It maintains the Denied Persons List, which is a list of persons for whom export privileges have been denied. | It maintains the Denied Persons List, which is a list of persons for whom export privileges have been denied. |
| 477d4e4f835-f001-499b-8531-158785c763ba | Not Translated (0%) | The BIS also administers the Export Administration Regulations (EAR). | The BIS also administers the Export Administration Regulations (EAR). |
| 478d4e4f835-f001-499b-8531-158785c763ba | Not Translated (0%) | The EAR applies to commodities, technology, software, and other things subject to export controls. | The EAR applies to commodities, technology, software, and other things subject to export controls. |
| 479ee4ee901-9547-4a23-b948-99f820b829d6 | Not Translated (0%) | Section 311 of the USA PATRIOT Act directs the Treasury to designate a financial institution or jurisdiction as being of “primary money laundering concern” based on numerous jurisdictional and institutional factors, including the extent to which the institution is used to facilitate or promote money laundering. | Section 311 of the USA PATRIOT Act directs the Treasury to designate a financial institution or jurisdiction as being of “primary money laundering concern” based on numerous jurisdictional and institutional factors, including the extent to which the institution is used to facilitate or promote money laundering. |
| 480ee4ee901-9547-4a23-b948-99f820b829d6 | Not Translated (0%) | While Section 311 is not technically a sanction, the results of Section 311 measures can be just as severe as sanctions because it prohibits US financial institutions from providing products or services to other financial institutions that in turn provide products or services to one of the designated institutions or jurisdictions of concern. | While Section 311 is not technically a sanction, the results of Section 311 measures can be just as severe as sanctions because it prohibits US financial institutions from providing products or services to other financial institutions that in turn provide products or services to one of the designated institutions or jurisdictions of concern. |
| 481ee4ee901-9547-4a23-b948-99f820b829d6 | Not Translated (0%) | Moreover, US institutions provide an annual notice to their foreign financial institution customers warning them against maintaining these accounts as downstream correspondent accounts. | Moreover, US institutions provide an annual notice to their foreign financial institution customers warning them against maintaining these accounts as downstream correspondent accounts. |
| 482ee4ee901-9547-4a23-b948-99f820b829d6 | Not Translated (0%) | The targeted financial institution is effectively cut off from the US dollar payment system. | The targeted financial institution is effectively cut off from the US dollar payment system. |
| 48314b87fcd-ad9c-484e-9d0b-5cb87fbe274a | Not Translated (0%) | In 2005, the Financial Crimes Enforcement Network (FinCEN) designated Banco Delta Asia, a bank in Macau, China, as being a primary money laundering concern for allegedly violating Treasury sanctions against North Korea. | In 2005, the Financial Crimes Enforcement Network (FinCEN) designated Banco Delta Asia, a bank in Macau, China, as being a primary money laundering concern for allegedly violating Treasury sanctions against North Korea. |
| 48414b87fcd-ad9c-484e-9d0b-5cb87fbe274a | Not Translated (0%) | However, prior to the designation becoming effective, the bank suffered a large number of withdrawals. | However, prior to the designation becoming effective, the bank suffered a large number of withdrawals. |
| 48514b87fcd-ad9c-484e-9d0b-5cb87fbe274a | Not Translated (0%) | Even before the Treasury had instituted a formal rule against Banco Delta Asia, the threat of designation alone had triggered the run on the bank. | Even before the Treasury had instituted a formal rule against Banco Delta Asia, the threat of designation alone had triggered the run on the bank. |
| 48614b87fcd-ad9c-484e-9d0b-5cb87fbe274a | Not Translated (0%) | Its deposits were depleted by 34% within days, and it had to go into receivership. | Its deposits were depleted by 34% within days, and it had to go into receivership. |
| 487c25fa908-eefd-4523-af95-9141dca5da76 | Not Translated (0%) | European Union | European Union |
| 488a35e2688-df2e-4668-8e03-d9ed83e4b0f2 | Not Translated (0%) | The EU’s restrictive measures (another term for sanctions) are prepared by the European External Action Service and agreed upon by the Council of the European Union. | The EU’s restrictive measures (another term for sanctions) are prepared by the European External Action Service and agreed upon by the Council of the European Union. |
| 489a35e2688-df2e-4668-8e03-d9ed83e4b0f2 | Not Translated (0%) | The measures are adopted to “bring about a change in policy or conduct of those targeted, with a view to promoting the objectives of the [EU’s] Common Foreign and Security Policy [CFSP].” | The measures are adopted to “bring about a change in policy or conduct of those targeted, with a view to promoting the objectives of the [EU’s] Common Foreign and Security Policy [CFSP].” |
| 490a35e2688-df2e-4668-8e03-d9ed83e4b0f2 | Not Translated (0%) | According to the EU’s guidelines on best practices, the EU aims to adopt sanctions in a manner that conforms to international law and is especially concerned with sanctions that may negatively impact human rights, fundamental freedoms, and the general well-being of persons. | According to the EU’s guidelines on best practices, the EU aims to adopt sanctions in a manner that conforms to international law and is especially concerned with sanctions that may negatively impact human rights, fundamental freedoms, and the general well-being of persons. |
| 4912bb5b8b0-b352-4915-b5e4-dc4547edd2ae | Not Translated (0%) | The EU adopts sanctions through decisions made by the CFSP. | The EU adopts sanctions through decisions made by the CFSP. |
| 4922bb5b8b0-b352-4915-b5e4-dc4547edd2ae | Not Translated (0%) | Prior to going to the CFSP, the proposed sanction is examined and discussed by a regional preparatory body. | Prior to going to the CFSP, the proposed sanction is examined and discussed by a regional preparatory body. |
| 4932bb5b8b0-b352-4915-b5e4-dc4547edd2ae | Not Translated (0%) | Next, it works its way through the Working Party of Foreign Relations Counsellors (RELEX), the Political and Security | Next, it works its way through the Working Party of Foreign Relations Counsellors (RELEX), the Political and Security |
| 49452363954-576f-4336-999d-ce336cf015cf | Not Translated (0%) | Committee (PSC), and the Committee of Permanent Representatives (COREPER II). | Committee (PSC), and the Committee of Permanent Representatives (COREPER II). |
| 49552363954-576f-4336-999d-ce336cf015cf | Not Translated (0%) | After making it that far, the resolution must be unanimously adopted by the CFSP. | After making it that far, the resolution must be unanimously adopted by the CFSP. |
| 49652363954-576f-4336-999d-ce336cf015cf | Not Translated (0%) | Upon being published in the Official Journal of the European Union, the sanction goes into effect. | Upon being published in the Official Journal of the European Union, the sanction goes into effect. |
| 49786040f9f-37ad-4a22-b6f2-debee43676d9 | Not Translated (0%) | As a matter of policy, the EU implements all sanctions enacted by the UN Security Council. | As a matter of policy, the EU implements all sanctions enacted by the UN Security Council. |
| 49886040f9f-37ad-4a22-b6f2-debee43676d9 | Not Translated (0%) | The EU does not need to pass any additional resolutions or transpose UN resolutions into EU law. | The EU does not need to pass any additional resolutions or transpose UN resolutions into EU law. |
| 49986040f9f-37ad-4a22-b6f2-debee43676d9 | Not Translated (0%) | However, as with its own EU sanctions, Member States of the EU are required to adopt their own legislation for monitoring and enforcing sanctions, such as penalties for violations. | However, as with its own EU sanctions, Member States of the EU are required to adopt their own legislation for monitoring and enforcing sanctions, such as penalties for violations. |
| 500784ccf25-6f39-400e-ab9a-60b44761793b | Not Translated (0%) | Influential Organizations | Influential Organizations |
| 5014cfa0efa-2743-4cd7-bd4f-51850305e292 | Not Translated (0%) | FINANCIAL ACTION TASK FORCE | FINANCIAL ACTION TASK FORCE |
| 502f35ac4cf-b45d-40c1-aec8-48fb86aa332b | Not Translated (0%) | A group of seven countries formed the Financial Action Task Force (FATF) in July 1989 at a summit held in Paris. | A group of seven countries formed the Financial Action Task Force (FATF) in July 1989 at a summit held in Paris. |
| 503f35ac4cf-b45d-40c1-aec8-48fb86aa332b | Not Translated (0%) | The initial purpose of FATF was to develop international standards to combat money laundering. | The initial purpose of FATF was to develop international standards to combat money laundering. |
| 504f35ac4cf-b45d-40c1-aec8-48fb86aa332b | Not Translated (0%) | However, after the terrorist attacks of September 11, 2001, FATF expanded its initial recommendations to include combatting terrorist financing. | However, after the terrorist attacks of September 11, 2001, FATF expanded its initial recommendations to include combatting terrorist financing. |
| 505f35ac4cf-b45d-40c1-aec8-48fb86aa332b | Not Translated (0%) | FATF has since expanded to include more than 35 countries. | FATF has since expanded to include more than 35 countries. |
| 50639dd285b-b017-4cb4-835b-4d5eb0dc7e01 | Not Translated (0%) | FATF itself has no formal power. | FATF itself has no formal power. |
| 50739dd285b-b017-4cb4-835b-4d5eb0dc7e01 | Not Translated (0%) | Instead, FATF’s influence is derived from the widespread adoption of its recommendations and its blacklist and greylist. | Instead, FATF’s influence is derived from the widespread adoption of its recommendations and its blacklist and greylist. |
| 50839dd285b-b017-4cb4-835b-4d5eb0dc7e01 | Not Translated (0%) | Moreover, Member States of the United Nations are expected to follow FATF recommendations as per a number of UN Security resolutions, including Resolution 2462 issued in March 2019. | Moreover, Member States of the United Nations are expected to follow FATF recommendations as per a number of UN Security resolutions, including Resolution 2462 issued in March 2019. |
| 509800cbe15-a8e6-4781-910c-9050053542b0 | Not Translated (0%) | The blacklist is a list of countries that FATF has determined are noncooperative in the international fight against money laundering and terrorist financing. | The blacklist is a list of countries that FATF has determined are noncooperative in the international fight against money laundering and terrorist financing. |
| 510800cbe15-a8e6-4781-910c-9050053542b0 | Not Translated (0%) | This list includes countries such as Iran and North Korea. | This list includes countries such as Iran and North Korea. |
| 511800cbe15-a8e6-4781-910c-9050053542b0 | Not Translated (0%) | Member countries of FATF are expected to apply countermeasures against blacklisted countries to guard the international financial system from the risks arising out of those jurisdictions. | Member countries of FATF are expected to apply countermeasures against blacklisted countries to guard the international financial system from the risks arising out of those jurisdictions. |
| 512aaf7561c-2599-4e3a-bfad-346e1782c56f | Not Translated (0%) | The greylist is a list of countries that FATF has determined do not merit inclusion on the blacklist but have strategic deficiencies in their anti-money laundering and counterterrorism financing regimes. | The greylist is a list of countries that FATF has determined do not merit inclusion on the blacklist but have strategic deficiencies in their anti-money laundering and counterterrorism financing regimes. |
| 513aaf7561c-2599-4e3a-bfad-346e1782c56f | Not Translated (0%) | Additionally, these countries have not made sufficient progress or otherwise committed to action plans to address the deficiencies identified by FATF. | Additionally, these countries have not made sufficient progress or otherwise committed to action plans to address the deficiencies identified by FATF. |
| 514aaf7561c-2599-4e3a-bfad-346e1782c56f | Not Translated (0%) | Ongoing failure to address these deficiencies could eventually result in being moved from the greylist to the blacklist. | Ongoing failure to address these deficiencies could eventually result in being moved from the greylist to the blacklist. |
| 515aaf7561c-2599-4e3a-bfad-346e1782c56f | Not Translated (0%) | Members of FATF are expected to use caution and consider the particular risks of those countries on the greylist. | Members of FATF are expected to use caution and consider the particular risks of those countries on the greylist. |
| 51690bc79e1-bc7d-4e25-8166-a84790c36dd9 | Not Translated (0%) | Financial Action Task Force. | Financial Action Task Force. |
| 51790bc79e1-bc7d-4e25-8166-a84790c36dd9 | Not Translated (0%) | FATF Public Statement, February 22, 2013. | FATF Public Statement, February 22, 2013. |
| 5180a197811-de1d-40db-a433-08022f779bf6 | Not Translated (0%) | When a country is placed on the greylist, it may lose access to the global financial system. | When a country is placed on the greylist, it may lose access to the global financial system. |
| 5190a197811-de1d-40db-a433-08022f779bf6 | Not Translated (0%) | One example is the country of Pakistan. | One example is the country of Pakistan. |
| 5200a197811-de1d-40db-a433-08022f779bf6 | Not Translated (0%) | In early 2019, India wanted Pakistan placed on the blacklist for its perceived lack of action against proscribed terrorist groups and failure to implement and enforce measures against terrorist financing and money laundering. | In early 2019, India wanted Pakistan placed on the blacklist for its perceived lack of action against proscribed terrorist groups and failure to implement and enforce measures against terrorist financing and money laundering. |
| 5210a197811-de1d-40db-a433-08022f779bf6 | Not Translated (0%) | In a plenary session of FATF, it was decided to keep Pakistan on the greylist and not move it onto the blacklist, which would have placed it among the likes of Iran and North Korea. | In a plenary session of FATF, it was decided to keep Pakistan on the greylist and not move it onto the blacklist, which would have placed it among the likes of Iran and North Korea. |
| 5220a197811-de1d-40db-a433-08022f779bf6 | Not Translated (0%) | FATF did warn Pakistan, however, to stick to deadlines with respect to curbing terror financing and money laundering, or otherwise risk being placed on the blacklist in the next meeting. | FATF did warn Pakistan, however, to stick to deadlines with respect to curbing terror financing and money laundering, or otherwise risk being placed on the blacklist in the next meeting. |
| 5236e3b4b01-2f28-4b09-9c0c-4ce48b63b394 | Not Translated (0%) | Being placed on the greylist comes with consequences. | Being placed on the greylist comes with consequences. |
| 5246e3b4b01-2f28-4b09-9c0c-4ce48b63b394 | Not Translated (0%) | While it is not as severe as being placed on the blacklist, Pakistan loses an estimated $10 billion annually as a result of its designation because nongovernmental organizations and other financial actors avoid the operational and reputational risks associated with dealing with Pakistan. | While it is not as severe as being placed on the blacklist, Pakistan loses an estimated $10 billion annually as a result of its designation because nongovernmental organizations and other financial actors avoid the operational and reputational risks associated with dealing with Pakistan. |
| 525a5c34e89-3713-4163-892d-2b0736d70d8e | Not Translated (0%) | FATF also evaluates countries’ compliance with its recommendations through Mutual Evaluation Reports (MERs). | FATF also evaluates countries’ compliance with its recommendations through Mutual Evaluation Reports (MERs). |
| 526a5c34e89-3713-4163-892d-2b0736d70d8e | Not Translated (0%) | MERs take into account, among other things, a country’s regulatory requirements, supervisory framework of financial institutions, sanctions regimes, international cooperation, and— most importantly—implementation and adherence to FATF’s recommendations. | MERs take into account, among other things, a country’s regulatory requirements, supervisory framework of financial institutions, sanctions regimes, international cooperation, and— most importantly—implementation and adherence to FATF’s recommendations. |
| 527a5c34e89-3713-4163-892d-2b0736d70d8e | Not Translated (0%) | Recommendation 6 specifically requires countries to implement targeted sanctions regimes to comply with UN Security Council resolutions that are relevant to sanctions. | Recommendation 6 specifically requires countries to implement targeted sanctions regimes to comply with UN Security Council resolutions that are relevant to sanctions. |
| 528a5c34e89-3713-4163-892d-2b0736d70d8e | Not Translated (0%) | While FATF does not have sanctions lists or restrictive measures, MERs may feed into financial institutions’ country risk ratings, which in turn impact the level of risk a financial institution may be willing to undertake in dealing with a particular geography. | While FATF does not have sanctions lists or restrictive measures, MERs may feed into financial institutions’ country risk ratings, which in turn impact the level of risk a financial institution may be willing to undertake in dealing with a particular geography. |
| 5290de735ac-552b-41b9-ad01-8dc93652a645 | Not Translated (0%) | Other Jurisdictions | Other Jurisdictions |
| 530164e437e-352f-4ce0-97c9-dd3ae3c25e47 | Not Translated (0%) | Other countries that have autonomous sanctions have agencies similar to OFAC. | Other countries that have autonomous sanctions have agencies similar to OFAC. |
| 531164e437e-352f-4ce0-97c9-dd3ae3c25e47 | Not Translated (0%) | Similar agencies include the following: | Similar agencies include the following: |
| 532e91cdf78-e89e-43fa-b9df-12d612958b50 | Not Translated (0%) | THE UNITED KINGDOM (UK) | THE UNITED KINGDOM (UK) |
| 533bc6874e7-06f0-4dbc-8c72-3b17158cd4f5 | Not Translated (0%) | The UK’s Foreign and Commonwealth Office is responsible for setting the UK’s sanctions policy. | The UK’s Foreign and Commonwealth Office is responsible for setting the UK’s sanctions policy. |
| 534bc6874e7-06f0-4dbc-8c72-3b17158cd4f5 | Not Translated (0%) | The Office of Financial Sanctions Implementation (OFSI) implements and administers sanctions, including the granting of licenses, and the Financial Conduct Authority (FCA) regulates firms, including financial institutions, to ensure they have controls in place to comply with UK laws. | The Office of Financial Sanctions Implementation (OFSI) implements and administers sanctions, including the granting of licenses, and the Financial Conduct Authority (FCA) regulates firms, including financial institutions, to ensure they have controls in place to comply with UK laws. |
| 535bc6874e7-06f0-4dbc-8c72-3b17158cd4f5 | Not Translated (0%) | The Department for International Trade implements trade measures/sanctions and embargoes. | The Department for International Trade implements trade measures/sanctions and embargoes. |
| 53690d2cae9-4146-4d5b-b403-c30ffb8c9922 | Not Translated (0%) | CANADA | CANADA |
| 537f977d135-421c-491e-b10c-07a94ba112e3 | Not Translated (0%) | Canada implements its autonomous sanctions under the Special Economic Measures Act (SEMA), which is administered and enforced by the Minister of Foreign Affairs in Canada. | Canada implements its autonomous sanctions under the Special Economic Measures Act (SEMA), which is administered and enforced by the Minister of Foreign Affairs in Canada. |
| 538f977d135-421c-491e-b10c-07a94ba112e3 | Not Translated (0%) | The primary agency regulating financial institutions is the Office of the Superintendent of Financial Institutions (OSFI). | The primary agency regulating financial institutions is the Office of the Superintendent of Financial Institutions (OSFI). |
| 539f977d135-421c-491e-b10c-07a94ba112e3 | Not Translated (0%) | Canada also has the Financial Transactions and Reports Analysis Centre (FINTRAC), which is Canada’s financial intelligence unit that may impose administrative monetary penalties for violations of the Proceeds of Crime (Money Laundering) and Terrorist Financing Act. | Canada also has the Financial Transactions and Reports Analysis Centre (FINTRAC), which is Canada’s financial intelligence unit that may impose administrative monetary penalties for violations of the Proceeds of Crime (Money Laundering) and Terrorist Financing Act. |
| 5400562096d-e50a-4578-89c6-53af800a524e | Not Translated (0%) | AUSTRALIA | AUSTRALIA |
| 5411f91eb91-e618-4026-abd5-a7e2edc3b717 | Not Translated (0%) | Australia’s sanctions regime consists of UN Security Council sanctions, including counterterrorism sanctions, and limited autonomous sanctions concerning Iran, Libya, Myanmar, North Korea, Syria, Russia/Ukraine, and several other territories. | Australia’s sanctions regime consists of UN Security Council sanctions, including counterterrorism sanctions, and limited autonomous sanctions concerning Iran, Libya, Myanmar, North Korea, Syria, Russia/Ukraine, and several other territories. |
| 5421f91eb91-e618-4026-abd5-a7e2edc3b717 | Not Translated (0%) | Australia implements autonomous sanctions under the Autonomous Sanctions Act of 2011. | Australia implements autonomous sanctions under the Autonomous Sanctions Act of 2011. |
| 5431f91eb91-e618-4026-abd5-a7e2edc3b717 | Not Translated (0%) | Australia’s general sanctions policy is set by the Department of Foreign Affairs and Trade (DFAT). | Australia’s general sanctions policy is set by the Department of Foreign Affairs and Trade (DFAT). |
| 5441f91eb91-e618-4026-abd5-a7e2edc3b717 | Not Translated (0%) | The Australian Transaction Reports and Analysis Centre (AUSTRAC) is also engaged in regulating financial institutions and ensuring compliance with Australian law. | The Australian Transaction Reports and Analysis Centre (AUSTRAC) is also engaged in regulating financial institutions and ensuring compliance with Australian law. |
| 5451f91eb91-e618-4026-abd5-a7e2edc3b717 | Not Translated (0%) | Like the United States and European Union, Australia has implemented targeted sanctions and a partial embargo of the Crimea region following Russia’s annexation of Crimea and Sevastopol in March 2014. | Like the United States and European Union, Australia has implemented targeted sanctions and a partial embargo of the Crimea region following Russia’s annexation of Crimea and Sevastopol in March 2014. |
| 5461f91eb91-e618-4026-abd5-a7e2edc3b717 | Not Translated (0%) | Australian sanctions generally do not have “extraterritorial” effects. | Australian sanctions generally do not have “extraterritorial” effects. |
| 54722e9dd8e-216b-4219-b434-ca7400aad15b | Not Translated (0%) | CHINA | CHINA |
| 548402c976a-4078-4ad0-955f-e225c5b7d3b9 | Not Translated (0%) | China is a permanent member of the UN Security Council. | China is a permanent member of the UN Security Council. |
| 549402c976a-4078-4ad0-955f-e225c5b7d3b9 | Not Translated (0%) | China takes part in the formulation of international sanctions through UN Security Council resolutions and implements those resolutions through various domestic laws, regulations, and directives aimed at Chinese persons, companies, and financial institutions. | China takes part in the formulation of international sanctions through UN Security Council resolutions and implements those resolutions through various domestic laws, regulations, and directives aimed at Chinese persons, companies, and financial institutions. |
| 550402c976a-4078-4ad0-955f-e225c5b7d3b9 | Not Translated (0%) | China also implements limited autonomous sanctions concerning issues such as terrorism. | China also implements limited autonomous sanctions concerning issues such as terrorism. |
| 551402c976a-4078-4ad0-955f-e225c5b7d3b9 | Not Translated (0%) | The Chinese Ministry of Foreign Affairs (MFA) is principally responsible for oversight of Chinese sanctions and promulgates sanctions through official announcements and through other governmental departments such as the People’s Bank of China (PBOC) and the Ministry of Public Security (MPS). | The Chinese Ministry of Foreign Affairs (MFA) is principally responsible for oversight of Chinese sanctions and promulgates sanctions through official announcements and through other governmental departments such as the People’s Bank of China (PBOC) and the Ministry of Public Security (MPS). |
| 552402c976a-4078-4ad0-955f-e225c5b7d3b9 | Not Translated (0%) | The Chinese government may, from time to time, exert economic pressure through informal directives aimed at state-owned enterprises or limited commercial boycotts, although such initiatives do not impose general prohibitions applicable to the public. | The Chinese government may, from time to time, exert economic pressure through informal directives aimed at state-owned enterprises or limited commercial boycotts, although such initiatives do not impose general prohibitions applicable to the public. |
| 553402c976a-4078-4ad0-955f-e225c5b7d3b9 | Not Translated (0%) | Chinese sanctions generally do not have “extraterritorial” effects. | Chinese sanctions generally do not have “extraterritorial” effects. |
| 554051f4ae4-51e8-4366-b65a-fe545cfbe293 | Not Translated (0%) | FRANCE | FRANCE |
| 555cc6d7a75-88e7-4b88-9453-5a99ef7869b8 | Not Translated (0%) | France implements both EU and UN sanctions but may also establish sanctions on its own. | France implements both EU and UN sanctions but may also establish sanctions on its own. |
| 556cc6d7a75-88e7-4b88-9453-5a99ef7869b8 | Not Translated (0%) | The French Treasury Directorate (Direction générale du Trésor), which is part of the Ministry of the Economy and Finances, has a dedicated website to describe and explain the different sanctions regimes and how they apply to French entities. | The French Treasury Directorate (Direction générale du Trésor), which is part of the Ministry of the Economy and Finances, has a dedicated website to describe and explain the different sanctions regimes and how they apply to French entities. |
| 557cc6d7a75-88e7-4b88-9453-5a99ef7869b8 | Not Translated (0%) | It has issued a guide (“Code de Bonne Conduite,” last updated in 2016) and various tables, which are recaps of sanctions currently in place. | It has issued a guide (“Code de Bonne Conduite,” last updated in 2016) and various tables, which are recaps of sanctions currently in place. |
| 558cc6d7a75-88e7-4b88-9453-5a99ef7869b8 | Not Translated (0%) | The French Treasury also maintains an updated list of applicable sanctions country by country and information on military equipment and dual-use goods. | The French Treasury also maintains an updated list of applicable sanctions country by country and information on military equipment and dual-use goods. |
| 559cc6d7a75-88e7-4b88-9453-5a99ef7869b8 | Not Translated (0%) | Exporters or other legal entities that might be concerned by sanctions must report to a designated service; however, they must first conduct their own due diligence and provide their conclusions. | Exporters or other legal entities that might be concerned by sanctions must report to a designated service; however, they must first conduct their own due diligence and provide their conclusions. |
| 560cc6d7a75-88e7-4b88-9453-5a99ef7869b8 | Not Translated (0%) | Exporters and other legal entities should address their requests for licenses or exemptions to an office of the French Treasury. | Exporters and other legal entities should address their requests for licenses or exemptions to an office of the French Treasury. |
| 561d39ec316-6173-408d-89b3-4514d8e1ed90 | Not Translated (0%) | GERMANY | GERMANY |
| 562054b2559-9e78-4f8c-8b21-40907b437504 | Not Translated (0%) | Germany implements both UN and EU sanctions. | Germany implements both UN and EU sanctions. |
| 563054b2559-9e78-4f8c-8b21-40907b437504 | Not Translated (0%) | It also has its own autonomous sanctions that are implemented primarily though the Foreign Trade and Payments Act (Außenwirtschaftsgesetz) and the Foreign Trade and Payments Ordinance (Außenwirtschaftsverordnung), which is enacted in part on the basis of the Foreign Trade and Payments Act. | It also has its own autonomous sanctions that are implemented primarily though the Foreign Trade and Payments Act (Außenwirtschaftsgesetz) and the Foreign Trade and Payments Ordinance (Außenwirtschaftsverordnung), which is enacted in part on the basis of the Foreign Trade and Payments Act. |
| 564054b2559-9e78-4f8c-8b21-40907b437504 | Not Translated (0%) | The Federal Ministry of Economics and Technology (BMWi) has responsibility for applying Germany’s autonomous sanctions and does so primarily by coordinating with the Federal Office of Economics and Export Control (BAFA) and the central bank of Germany, Deutsche Bundesbank. | The Federal Ministry of Economics and Technology (BMWi) has responsibility for applying Germany’s autonomous sanctions and does so primarily by coordinating with the Federal Office of Economics and Export Control (BAFA) and the central bank of Germany, Deutsche Bundesbank. |
| 565054b2559-9e78-4f8c-8b21-40907b437504 | Not Translated (0%) | BAFA is primarily responsible for the licensing and certifications required for the export of certain controlled goods. | BAFA is primarily responsible for the licensing and certifications required for the export of certain controlled goods. |
| 566054b2559-9e78-4f8c-8b21-40907b437504 | Not Translated (0%) | BAFA, among other requirements, collects information on an applicant’s experience in defense activities, industrial activity, written commitments, and other information to assess the applicant’s reliability. | BAFA, among other requirements, collects information on an applicant’s experience in defense activities, industrial activity, written commitments, and other information to assess the applicant’s reliability. |
| 567054b2559-9e78-4f8c-8b21-40907b437504 | Not Translated (0%) | The Federal Financial Supervisory Authority (Federal Ministry of Economics and Technology) supervises financial institutions. | The Federal Financial Supervisory Authority (Federal Ministry of Economics and Technology) supervises financial institutions. |
| 568edd519de-09ad-4120-a575-7fbe42f6372d | Not Translated (0%) | HONG KONG (China) | HONG KONG (China) |
| 56936479a21-8030-448a-994a-5d7dfffce48b | Not Translated (0%) | The Hong Kong Special Administrative Region (SAR) implements UN Security Council sanctions, including counterterrorism sanctions, under the direction of the Chinese Ministry of Foreign Affairs (MFA) (with the exception of any UN sanctions targeting the Chinese mainland). | The Hong Kong Special Administrative Region (SAR) implements UN Security Council sanctions, including counterterrorism sanctions, under the direction of the Chinese Ministry of Foreign Affairs (MFA) (with the exception of any UN sanctions targeting the Chinese mainland). |
| 57036479a21-8030-448a-994a-5d7dfffce48b | Not Translated (0%) | Hong Kong does not have an autonomous sanctions regime. | Hong Kong does not have an autonomous sanctions regime. |
| 57136479a21-8030-448a-994a-5d7dfffce48b | Not Translated (0%) | Multiple agencies share responsibility for the administration and enforcement of sanctions in the SAR. | Multiple agencies share responsibility for the administration and enforcement of sanctions in the SAR. |
| 57236479a21-8030-448a-994a-5d7dfffce48b | Not Translated (0%) | These include the Chief Executive, Department of Justice, Customs and Excise Department, Commerce and Economic Development Bureau, Trade and Industry Department, Hong Kong Monetary Authority (HKMA), Securities and Futures Commission (SFC), and other bodies that are responsible for oversight of companies and financial institutions in compliance with Hong Kong AML/CFT and UN sanctions laws and regulations. | These include the Chief Executive, Department of Justice, Customs and Excise Department, Commerce and Economic Development Bureau, Trade and Industry Department, Hong Kong Monetary Authority (HKMA), Securities and Futures Commission (SFC), and other bodies that are responsible for oversight of companies and financial institutions in compliance with Hong Kong AML/CFT and UN sanctions laws and regulations. |
| 57336479a21-8030-448a-994a-5d7dfffce48b | Not Translated (0%) | The HKMA has increased oversight of sanctions compliance by authorized financial institutions in recent years, including by undertaking a thematic review of sanctions name screening technology. | The HKMA has increased oversight of sanctions compliance by authorized financial institutions in recent years, including by undertaking a thematic review of sanctions name screening technology. |
| 57436479a21-8030-448a-994a-5d7dfffce48b | Not Translated (0%) | Given the wide variety of foreign financial institutions operating in Hong Kong, many financial institutions in the SAR also are required to (or choose to) comply with US, EU, or other domestic sanctions regulations. | Given the wide variety of foreign financial institutions operating in Hong Kong, many financial institutions in the SAR also are required to (or choose to) comply with US, EU, or other domestic sanctions regulations. |
| 575ca666b2a-172c-4fe9-9406-10152258ce41 | Not Translated (0%) | INDIA | INDIA |
| 5761c6b7769-5f62-4433-bfc3-7d2388aa0af7 | Not Translated (0%) | Generally speaking, India’s economic sanctions framework is less extensive than other countries in Asia. | Generally speaking, India’s economic sanctions framework is less extensive than other countries in Asia. |
| 5771c6b7769-5f62-4433-bfc3-7d2388aa0af7 | Not Translated (0%) | India also retains strong economic ties to countries, such as Iran, which are subject to various other international sanctions regimes. | India also retains strong economic ties to countries, such as Iran, which are subject to various other international sanctions regimes. |
| 5781c6b7769-5f62-4433-bfc3-7d2388aa0af7 | Not Translated (0%) | Like other United Nations members, India implements UN Security Council resolutions, in particular, anti-terrorism sanctions, but India does not have unilateral or autonomous sanctions. | Like other United Nations members, India implements UN Security Council resolutions, in particular, anti-terrorism sanctions, but India does not have unilateral or autonomous sanctions. |
| 5791c6b7769-5f62-4433-bfc3-7d2388aa0af7 | Not Translated (0%) | Indian sanctions laws generally apply within India and do not have “extraterritorial” effects. | Indian sanctions laws generally apply within India and do not have “extraterritorial” effects. |
| 5801c6b7769-5f62-4433-bfc3-7d2388aa0af7 | Not Translated (0%) | The Reserve Bank of India (RBI), the country’s central bank, publishes notifications to financial institutions in India concerning updates to relevant sanctions lists. | The Reserve Bank of India (RBI), the country’s central bank, publishes notifications to financial institutions in India concerning updates to relevant sanctions lists. |
| 5811c6b7769-5f62-4433-bfc3-7d2388aa0af7 | Not Translated (0%) | RBI is also the country’s primary AML/CFT regulator. | RBI is also the country’s primary AML/CFT regulator. |
| 582c4d071c9-8700-4092-b337-630c767c2fad | Not Translated (0%) | JAPAN | JAPAN |
| 58392ee0fda-346e-4f3f-a3a6-7f9ee935d70c | Not Translated (0%) | Japan implements both UN Security Council sanctions and certain autonomous sanctions, which are applicable to Japanese persons and companies and in Japan’s territory. | Japan implements both UN Security Council sanctions and certain autonomous sanctions, which are applicable to Japanese persons and companies and in Japan’s territory. |
| 58492ee0fda-346e-4f3f-a3a6-7f9ee935d70c | Not Translated (0%) | Notably, Japan imposes unilateral sanctions targeting North Korea, which may be coordinated with sanctions by other countries such as the United States. | Notably, Japan imposes unilateral sanctions targeting North Korea, which may be coordinated with sanctions by other countries such as the United States. |
| 58592ee0fda-346e-4f3f-a3a6-7f9ee935d70c | Not Translated (0%) | The Ministry of Finance (MOF) and Ministry of Economy, Trade and Industry (METI) both take part in overseeing Japan’s sanctions regime. | The Ministry of Finance (MOF) and Ministry of Economy, Trade and Industry (METI) both take part in overseeing Japan’s sanctions regime. |
| 58692ee0fda-346e-4f3f-a3a6-7f9ee935d70c | Not Translated (0%) | MOF, which is Japan’s principal AML/CFT regulator, also oversees compliance with sanctions by financial institutions in Japan as part of their overall AML/CFT programs. | MOF, which is Japan’s principal AML/CFT regulator, also oversees compliance with sanctions by financial institutions in Japan as part of their overall AML/CFT programs. |
| 58792ee0fda-346e-4f3f-a3a6-7f9ee935d70c | Not Translated (0%) | Japanese law enforcement also compile lists of “anti-social forces,” which include the names of organized crime members. | Japanese law enforcement also compile lists of “anti-social forces,” which include the names of organized crime members. |
| 58892ee0fda-346e-4f3f-a3a6-7f9ee935d70c | Not Translated (0%) | These lists are made available to financial institutions in Japan for the purpose of customer screening. | These lists are made available to financial institutions in Japan for the purpose of customer screening. |
| 589f1a7a87b-5ce5-4470-9d5e-878bfcec9b5b | Not Translated (0%) | NEW ZEALAND | NEW ZEALAND |
| 590859df917-eb46-482a-a83f-6ad18a788b71 | Not Translated (0%) | New Zealand implements UN Security Council sanctions through the country’s Ministry of Foreign Affairs and Trade (MFAT). | New Zealand implements UN Security Council sanctions through the country’s Ministry of Foreign Affairs and Trade (MFAT). |
| 591859df917-eb46-482a-a83f-6ad18a788b71 | Not Translated (0%) | New Zealand sanctions are generally applicable to New Zealand citizens, companies incorporated in New Zealand, and activities taking place in New Zealand’s territory. | New Zealand sanctions are generally applicable to New Zealand citizens, companies incorporated in New Zealand, and activities taking place in New Zealand’s territory. |
| 592859df917-eb46-482a-a83f-6ad18a788b71 | Not Translated (0%) | New Zealand does not have unilateral or autonomous sanctions (except travel bans) and their sanctions lack “extraterritorial” effects. | New Zealand does not have unilateral or autonomous sanctions (except travel bans) and their sanctions lack “extraterritorial” effects. |
| 593859df917-eb46-482a-a83f-6ad18a788b71 | Not Translated (0%) | Additional oversight of sanctions compliance may be provided by the Reserve Bank of New Zealand (RBZ), the Financial Markets Authority (FMA), and the Department of Internal Affairs (DIA), which share responsibility for oversight of New Zealand’s AML/CFT framework. | Additional oversight of sanctions compliance may be provided by the Reserve Bank of New Zealand (RBZ), the Financial Markets Authority (FMA), and the Department of Internal Affairs (DIA), which share responsibility for oversight of New Zealand’s AML/CFT framework. |
| 594e0da964f-4161-4532-a503-92bfcb3f3f9f | Not Translated (0%) | TAIWAN | TAIWAN |
| 595cc90ed35-2f51-4831-9c2a-5f9c627199a8 | Not Translated (0%) | Although not a member of the United Nations, Taiwan generally implements and enforces UN Security Council sanctions through the Ministry of Foreign Affairs (MFA) and the Bureau of Foreign Trade (BFT). | Although not a member of the United Nations, Taiwan generally implements and enforces UN Security Council sanctions through the Ministry of Foreign Affairs (MFA) and the Bureau of Foreign Trade (BFT). |
| 596cc90ed35-2f51-4831-9c2a-5f9c627199a8 | Not Translated (0%) | Of note, Taiwan issued a total ban on trade with North Korea in September 2017 in response to heightened UN and US sanctions against North Korea. | Of note, Taiwan issued a total ban on trade with North Korea in September 2017 in response to heightened UN and US sanctions against North Korea. |
| 597cc90ed35-2f51-4831-9c2a-5f9c627199a8 | Not Translated (0%) | Furthermore, as a member of the Asia Pacific Group (APG), a Financial Action Task Force (FATF) regional-style body, Taiwan is obligated to adopt international anti-proliferation and counterterrorism sanctions. | Furthermore, as a member of the Asia Pacific Group (APG), a Financial Action Task Force (FATF) regional-style body, Taiwan is obligated to adopt international anti-proliferation and counterterrorism sanctions. |
| 598cc90ed35-2f51-4831-9c2a-5f9c627199a8 | Not Translated (0%) | The BFT is primarily responsible for reviewing and approving licensing requests and issuing regulations and guidance concerning Taiwan sanctions and export controls. | The BFT is primarily responsible for reviewing and approving licensing requests and issuing regulations and guidance concerning Taiwan sanctions and export controls. |
| 599cc90ed35-2f51-4831-9c2a-5f9c627199a8 | Not Translated (0%) | Like many countries, Taiwan maintains a list of sensitive commodities such as dual-use goods. | Like many countries, Taiwan maintains a list of sensitive commodities such as dual-use goods. |
| 600cc90ed35-2f51-4831-9c2a-5f9c627199a8 | Not Translated (0%) | This list is published by the BFT. | This list is published by the BFT. |
| 601cc90ed35-2f51-4831-9c2a-5f9c627199a8 | Not Translated (0%) | The Financial Supervisory Commission (FSC) has oversight of Taiwanese financial institutions’ compliance with sanctions as part of their overall AML/CFT programs. | The Financial Supervisory Commission (FSC) has oversight of Taiwanese financial institutions’ compliance with sanctions as part of their overall AML/CFT programs. |
| 6027c722aca-4b08-4cd9-8355-55c7827c2b10 | Not Translated (0%) | SINGAPORE | SINGAPORE |
| 603988a0643-1b1c-43ad-92cb-d9e0519eb94d | Not Translated (0%) | Singapore, like most Asia Pacific countries, implements UN Security Council sanctions and limited autonomous sanctions. | Singapore, like most Asia Pacific countries, implements UN Security Council sanctions and limited autonomous sanctions. |
| 604988a0643-1b1c-43ad-92cb-d9e0519eb94d | Not Translated (0%) | Financial sanctions are administered by the Monetary Authority of Singapore (MAS). | Financial sanctions are administered by the Monetary Authority of Singapore (MAS). |
| 605988a0643-1b1c-43ad-92cb-d9e0519eb94d | Not Translated (0%) | Under the Terrorism (Suppression of Financing) Act, Singapore has the ability to designate terrorist subjects through the Inter-Ministry Committee on Terrorist Designation (IMCTD). | Under the Terrorism (Suppression of Financing) Act, Singapore has the ability to designate terrorist subjects through the Inter-Ministry Committee on Terrorist Designation (IMCTD). |
| 606988a0643-1b1c-43ad-92cb-d9e0519eb94d | Not Translated (0%) | Singapore sanctions generally do not have “extraterritorial” effects. | Singapore sanctions generally do not have “extraterritorial” effects. |
| 607988a0643-1b1c-43ad-92cb-d9e0519eb94d | Not Translated (0%) | However, as an important regional trading hub, Singapore is influenced by many international sanctions regimes, including US and EU sanctions that apply to many international financial institutions operating in the country. | However, as an important regional trading hub, Singapore is influenced by many international sanctions regimes, including US and EU sanctions that apply to many international financial institutions operating in the country. |
| 60865be105c-36ab-4b2d-be7c-cb048ffed52a | Not Translated (0%) | SOUTH KOREA | SOUTH KOREA |
| 609e68309bf-f714-4e57-bed1-717bf6d69475 | Not Translated (0%) | South Korea implements autonomous sanctions under the Prohibition on the Financing of Offences of Public Intimidation and Proliferation of Weapons of Mass Destruction Act (amended in May 2014 from the original act). | South Korea implements autonomous sanctions under the Prohibition on the Financing of Offences of Public Intimidation and Proliferation of Weapons of Mass Destruction Act (amended in May 2014 from the original act). |
| 610e68309bf-f714-4e57-bed1-717bf6d69475 | Not Translated (0%) | Under the act, the Financial Services Commission may designate entities that are found to be related to terrorist financing. | Under the act, the Financial Services Commission may designate entities that are found to be related to terrorist financing. |
| 611e68309bf-f714-4e57-bed1-717bf6d69475 | Not Translated (0%) | South Korea’s Financial Supervisory Service regulates financial institutions, and the Ministry of Trade, Industry, and Economy is responsible for trade restrictions. | South Korea’s Financial Supervisory Service regulates financial institutions, and the Ministry of Trade, Industry, and Economy is responsible for trade restrictions. |
| 612670eb78a-fb02-446d-a42c-3a176d445a87 | Not Translated (0%) | SWITZERLAND | SWITZERLAND |
| 61303cb56d8-6437-429d-a9b7-66199fe4f1f6 | Not Translated (0%) | Switzerland implements both UN sanctions and its own autonomous sanctions. | Switzerland implements both UN sanctions and its own autonomous sanctions. |
| 61403cb56d8-6437-429d-a9b7-66199fe4f1f6 | Not Translated (0%) | Its Federal Act on the Implementation of International Standards (the Embargo Act or “EmbA”) is the set of regulations enabling it to enact sanctions ordered by the UN, the EU, or its significant trading partners. | Its Federal Act on the Implementation of International Standards (the Embargo Act or “EmbA”) is the set of regulations enabling it to enact sanctions ordered by the UN, the EU, or its significant trading partners. |
| 61503cb56d8-6437-429d-a9b7-66199fe4f1f6 | Not Translated (0%) | Under EmbA, compulsory measures allow it to: | Under EmbA, compulsory measures allow it to: |
| 61603cb56d8-6437-429d-a9b7-66199fe4f1f6 | Not Translated (0%) | “a. directly or indirectly restrict transactions involving goods and services, payments and capital transfers, and the movement of persons, as well as scientific, technological and cultural exchange” and “b. include prohibitions, licensing and reporting obligations as well as other restrictions of rights.” | “a. directly or indirectly restrict transactions involving goods and services, payments and capital transfers, and the movement of persons, as well as scientific, technological and cultural exchange” and “b. include prohibitions, licensing and reporting obligations as well as other restrictions of rights.” |
| 61703cb56d8-6437-429d-a9b7-66199fe4f1f6 | Not Translated (0%) | Under the Federal Council, exceptions may be allowed for humanitarian activities, such as for food and medicine. | Under the Federal Council, exceptions may be allowed for humanitarian activities, such as for food and medicine. |
| 61803cb56d8-6437-429d-a9b7-66199fe4f1f6 | Not Translated (0%) | Those persons that are impacted, either indirectly or directly by the measures, are subject to inspection of their business premises without prior notice during working hours for the examination of documentation and other relevant information. | Those persons that are impacted, either indirectly or directly by the measures, are subject to inspection of their business premises without prior notice during working hours for the examination of documentation and other relevant information. |
| 61903cb56d8-6437-429d-a9b7-66199fe4f1f6 | Not Translated (0%) | Switzerland’s State Secretariat of Economic Affairs maintains its sanctions list, which can be found online. | Switzerland’s State Secretariat of Economic Affairs maintains its sanctions list, which can be found online. |
| 620f32b6249-59d9-4819-a820-ac22d2426960 | Not Translated (0%) | Who Is Subject to Sanctions? | Who Is Subject to Sanctions? |
| 621519a3ecc-a5e8-49a0-9270-587324578e95 | Not Translated (0%) | There are two categories of those who are subject to sanctions. | There are two categories of those who are subject to sanctions. |
| 622519a3ecc-a5e8-49a0-9270-587324578e95 | Not Translated (0%) | First are the individuals and entities required to comply with sanctions, and second are those who are eligible targets of sanctions. | First are the individuals and entities required to comply with sanctions, and second are those who are eligible targets of sanctions. |
| 623cdb8418b-6049-421f-ad39-23bb9345fa4e | Not Translated (0%) | Sanctions are applicable to everyone. | Sanctions are applicable to everyone. |
| 624cdb8418b-6049-421f-ad39-23bb9345fa4e | Not Translated (0%) | While, for instance, an individual might not personally conduct due diligence of every vendor prior to buying a cup of coffee in order to determine whether it is sanctioned, the buyer could be held liable, for example, if the beans were sourced from Iran, however unlikely. | While, for instance, an individual might not personally conduct due diligence of every vendor prior to buying a cup of coffee in order to determine whether it is sanctioned, the buyer could be held liable, for example, if the beans were sourced from Iran, however unlikely. |
| 625cdb8418b-6049-421f-ad39-23bb9345fa4e | Not Translated (0%) | Complying with sanctions requires using a risk-based approach. | Complying with sanctions requires using a risk-based approach. |
| 626cdb8418b-6049-421f-ad39-23bb9345fa4e | Not Translated (0%) | Even though guidance is provided on how best to comply with sanctions, it is not expected that the average citizen will have a personal, fully formed sanctions compliance program. | Even though guidance is provided on how best to comply with sanctions, it is not expected that the average citizen will have a personal, fully formed sanctions compliance program. |
| 6276a664f28-f119-40ca-92c6-8e81462339c1 | Not Translated (0%) | Additionally, sanctions are a matter of jurisdiction. | Additionally, sanctions are a matter of jurisdiction. |
| 6286a664f28-f119-40ca-92c6-8e81462339c1 | Not Translated (0%) | Citizens of a country (and permanent residents) must comply with sanctions regardless of whether they are outside of their home country. | Citizens of a country (and permanent residents) must comply with sanctions regardless of whether they are outside of their home country. |
| 6296a664f28-f119-40ca-92c6-8e81462339c1 | Not Translated (0%) | This is true for US, EU, and most other autonomous sanctions. | This is true for US, EU, and most other autonomous sanctions. |
| 6306a664f28-f119-40ca-92c6-8e81462339c1 | Not Translated (0%) | If a person is on vacation overseas, their country’s sanctions laws still apply. | If a person is on vacation overseas, their country’s sanctions laws still apply. |
| 6316a664f28-f119-40ca-92c6-8e81462339c1 | Not Translated (0%) | Conversely, any individual, regardless of citizenship, must comply with the sanctions law of any country they are in physically. | Conversely, any individual, regardless of citizenship, must comply with the sanctions law of any country they are in physically. |
| 632ffc274ce-85e9-4670-acbc-1c7b88712ebb | Not Translated (0%) | The following is a summary of people and entities who must comply with OFAC regulations: | The following is a summary of people and entities who must comply with OFAC regulations: |
| 6331f028e28-721f-43dd-ba85-dc78a7147366 | Not Translated (0%) | US citizens and permanent residents wherever located | US citizens and permanent residents wherever located |
| 634127bf698-fe1e-49c3-b359-4f302f24caa3 | Not Translated (0%) | Companies and other entities organized under US law | Companies and other entities organized under US law |
| 63512dbef87-4c25-45d2-8c76-c1bad5340619 | Not Translated (0%) | All people and organizations, whatever their origin, physically in the United States; and | All people and organizations, whatever their origin, physically in the United States; and |
| 636f2f670d7-565e-4570-b398-85dd3c928617 | Not Translated (0%) | All branches of US companies and other entities throughout the world | All branches of US companies and other entities throughout the world |
| 637abd88828-ee17-4d28-adcb-46f318eb11b5 | Not Translated (0%) | Note that for legal entities, the rules are similar to those for people. | Note that for legal entities, the rules are similar to those for people. |
| 638abd88828-ee17-4d28-adcb-46f318eb11b5 | Not Translated (0%) | Any legal entity physically located in a jurisdiction is subject to that jurisdiction. | Any legal entity physically located in a jurisdiction is subject to that jurisdiction. |
| 639abd88828-ee17-4d28-adcb-46f318eb11b5 | Not Translated (0%) | So foreign branches, agencies, and subsidiaries in the US must comply with US sanctions, and any foreign branches, agencies, and subsidiaries physically located within the territory of the EU, including its airspace, must comply with EU sanctions. | So foreign branches, agencies, and subsidiaries in the US must comply with US sanctions, and any foreign branches, agencies, and subsidiaries physically located within the territory of the EU, including its airspace, must comply with EU sanctions. |
| 640abd88828-ee17-4d28-adcb-46f318eb11b5 | Not Translated (0%) | This principle will generally apply to all autonomous sanctions. | This principle will generally apply to all autonomous sanctions. |
| 64133b0bda1-bd59-49f7-b75c-9c78b7eb13ed | Not Translated (0%) | In its 2012 Guidelines on Implementation and Evaluation of Restrictive Measures (Sanctions) in the Framework of the EU Common Foreign and Security Policy, the EU expressly states that the sanctions it imposes will apply only where links to the EU are present. | In its 2012 Guidelines on Implementation and Evaluation of Restrictive Measures (Sanctions) in the Framework of the EU Common Foreign and Security Policy, the EU expressly states that the sanctions it imposes will apply only where links to the EU are present. |
| 64233b0bda1-bd59-49f7-b75c-9c78b7eb13ed | Not Translated (0%) | In paragraph 88, the guidelines state that regulations shall apply: | In paragraph 88, the guidelines state that regulations shall apply: |
| 64369349c07-4bf0-4b31-8b97-fbb89cf3683c | Not Translated (0%) | Within the territory of the (European) Union, including its airspace | Within the territory of the (European) Union, including its airspace |
| 6440eff36cd-2d2a-4145-b6a7-fc406a0eda7f | Not Translated (0%) | On board any aircraft or any vessel under the jurisdiction of a Member State | On board any aircraft or any vessel under the jurisdiction of a Member State |
| 6456b35b196-0206-4d5d-bf37-b1f1f7277e40 | Not Translated (0%) | To any person inside or outside the territory of the (European) Union who is a national of a Member State | To any person inside or outside the territory of the (European) Union who is a national of a Member State |
| 6463eb9c25e-0e90-469d-bc04-17e805af0d6b | Not Translated (0%) | To any legal person, entity or body, inside or outside the territory of the (European) Union, which is incorporated or constituted under the law of a Member State | To any legal person, entity or body, inside or outside the territory of the (European) Union, which is incorporated or constituted under the law of a Member State |
| 647d567716a-2c60-40a0-90ea-126878fd066b | Not Translated (0%) | To any legal person, entity or body in respect of any business done in whole or in part within the (European) Union | To any legal person, entity or body in respect of any business done in whole or in part within the (European) Union |
| 648a3c2dbb5-d6dc-4473-a3c8-6569d60d7efe | Not Translated (0%) | In the US, legal entities organized under US law and their foreign branches must comply with US sanctions. | In the US, legal entities organized under US law and their foreign branches must comply with US sanctions. |
| 649a3c2dbb5-d6dc-4473-a3c8-6569d60d7efe | Not Translated (0%) | The same holds true for legal entities and their branches that are organized under the laws of an EU jurisdiction. | The same holds true for legal entities and their branches that are organized under the laws of an EU jurisdiction. |
| 650a3c2dbb5-d6dc-4473-a3c8-6569d60d7efe | Not Translated (0%) | For example, UK legal entities established under UK law, including their branches, must also comply with UK financial sanctions in force, irrespective of where their activities take place. | For example, UK legal entities established under UK law, including their branches, must also comply with UK financial sanctions in force, irrespective of where their activities take place. |
| 651ad169b5e-6f6c-42b9-a2cb-8f5fcc79dc04 | Not Translated (0%) | However, under EU sanctions, a company’s subsidiaries located and doing business outside of the EU are not subject to EU sanctions. | However, under EU sanctions, a company’s subsidiaries located and doing business outside of the EU are not subject to EU sanctions. |
| 652ad169b5e-6f6c-42b9-a2cb-8f5fcc79dc04 | Not Translated (0%) | This does not apply to branches of EU companies, as branches are not distinct legal entities. | This does not apply to branches of EU companies, as branches are not distinct legal entities. |
| 653ad169b5e-6f6c-42b9-a2cb-8f5fcc79dc04 | Not Translated (0%) | Although EU sanctions are not extraterritorial, the EU may issue anti-circumvention legislation preventing EU companies from circumventing EU sanctions by using a non-EU subsidiary as a proxy. | Although EU sanctions are not extraterritorial, the EU may issue anti-circumvention legislation preventing EU companies from circumventing EU sanctions by using a non-EU subsidiary as a proxy. |
| 654ad169b5e-6f6c-42b9-a2cb-8f5fcc79dc04 | Not Translated (0%) | For example in the context of Ukrainian/Russia related sanctions, Article 12 of Council Regulation 833/2014 prohibits companies from: | For example in the context of Ukrainian/Russia related sanctions, Article 12 of Council Regulation 833/2014 prohibits companies from: |
| 655ad169b5e-6f6c-42b9-a2cb-8f5fcc79dc04 | Not Translated (0%) | “participate, knowingly and intentionally, in activities the object or effect of which is to circumvent the prohibitions…, including acting as a substitute for entities….” | “participate, knowingly and intentionally, in activities the object or effect of which is to circumvent the prohibitions…, including acting as a substitute for entities….” |
| 656aa71c8e6-4310-4458-a686-2cc83837548a | Not Translated (0%) | But if sanctions regimes do not necessarily have prescriptive rules that must be followed regardless of the potential for a violation to occur, such as a legal requirement to collect identifying information on a customer, then why do financial institutions spend so much money on these programs? | But if sanctions regimes do not necessarily have prescriptive rules that must be followed regardless of the potential for a violation to occur, such as a legal requirement to collect identifying information on a customer, then why do financial institutions spend so much money on these programs? |
| 657aa71c8e6-4310-4458-a686-2cc83837548a | Not Translated (0%) | The answer is that domestically, governments regulate compliance with sanctions through penalties, including fines and imprisonment. | The answer is that domestically, governments regulate compliance with sanctions through penalties, including fines and imprisonment. |
| 658d3a70bf5-b5b6-4962-8f98-8ebe73d5a746 | Not Translated (0%) | In this respect there may not be much difference between the coffee shop at the exit of the subway and the large financial institution at which compliance professionals work. | In this respect there may not be much difference between the coffee shop at the exit of the subway and the large financial institution at which compliance professionals work. |
| 659d3a70bf5-b5b6-4962-8f98-8ebe73d5a746 | Not Translated (0%) | Both are subject to the same fines and penalties that may result from a sanctions breach. | Both are subject to the same fines and penalties that may result from a sanctions breach. |
| 660d3a70bf5-b5b6-4962-8f98-8ebe73d5a746 | Not Translated (0%) | However, because the cost of a cup of coffee is $3.12 and its sale to a sanctioned target would have little impact on undermining the purpose of a sanctions regime compared to the remittance of a $50,000 wire to a sanctioned target in a sanctioned country, some industries, like financial institutions, should have robust sanctions compliance programs. | However, because the cost of a cup of coffee is $3.12 and its sale to a sanctioned target would have little impact on undermining the purpose of a sanctions regime compared to the remittance of a $50,000 wire to a sanctioned target in a sanctioned country, some industries, like financial institutions, should have robust sanctions compliance programs. |
| 661ca05dd81-4bfb-4706-8555-bc3ab1d1e877 | Not Translated (0%) | Given the large exposure financial institutions may have to potential sanctions violations and the large fines that may occur, financial institutions may be regulated for sanctions compliance as a matter of safety and soundness to their financial health. | Given the large exposure financial institutions may have to potential sanctions violations and the large fines that may occur, financial institutions may be regulated for sanctions compliance as a matter of safety and soundness to their financial health. |
| 662ca05dd81-4bfb-4706-8555-bc3ab1d1e877 | Not Translated (0%) | The US is a well-known example of this. | The US is a well-known example of this. |
| 663ca05dd81-4bfb-4706-8555-bc3ab1d1e877 | Not Translated (0%) | The US enforces sanctions compliance programs on regulated institutions as a matter of safety and soundness. | The US enforces sanctions compliance programs on regulated institutions as a matter of safety and soundness. |
| 664ca05dd81-4bfb-4706-8555-bc3ab1d1e877 | Not Translated (0%) | This means that sanctions violations may result in penalties so large that the safety and soundness of the financial institution is placed in jeopardy. | This means that sanctions violations may result in penalties so large that the safety and soundness of the financial institution is placed in jeopardy. |
| 6658d2d2265-1744-4e74-b5c6-5bceaa176604 | Not Translated (0%) | To help firms avoid sanctions violations and penalties, OFAC released “A Framework for OFAC Compliance Commitments,” providing guidance on compliance programs. | To help firms avoid sanctions violations and penalties, OFAC released “A Framework for OFAC Compliance Commitments,” providing guidance on compliance programs. |
| 6668d2d2265-1744-4e74-b5c6-5bceaa176604 | Not Translated (0%) | These are not regulations with which noncompliance could lead to found violations. | These are not regulations with which noncompliance could lead to found violations. |
| 6678d2d2265-1744-4e74-b5c6-5bceaa176604 | Not Translated (0%) | Rather, they are agency guidance to help firms avoid sanctions violations and penalties. | Rather, they are agency guidance to help firms avoid sanctions violations and penalties. |
| 66845ce2fbc-0962-427a-972d-e76ff6ff9d77 | Not Translated (0%) | It is also important to keep in mind that, while economic sanctions apply to property, the term “property” is very broadly defined to include much more than money and trade goods. | It is also important to keep in mind that, while economic sanctions apply to property, the term “property” is very broadly defined to include much more than money and trade goods. |
| 66945ce2fbc-0962-427a-972d-e76ff6ff9d77 | Not Translated (0%) | In the US, the terms “property” and “property interest” include checks, merchandise, trademarks, annuities, and a broad array of other interests as defined in US law. | In the US, the terms “property” and “property interest” include checks, merchandise, trademarks, annuities, and a broad array of other interests as defined in US law. |
| 67092d2e3a5-9f17-43f4-9011-9c7b6315c9ff | Not Translated (0%) | 51 FR 2463, January 16, 1986. | 51 FR 2463, January 16, 1986. |
| 6713dd00859-e215-4a67-b09c-aec562932ff4 | Not Translated (0%) | This broad definition would include virtually all financial or commercial activity. | This broad definition would include virtually all financial or commercial activity. |
| 6723dd00859-e215-4a67-b09c-aec562932ff4 | Not Translated (0%) | Although there are sanctions, such as travel bans, that do not involve property, economic sanctions have by far the most implications for a sanctions compliance program. | Although there are sanctions, such as travel bans, that do not involve property, economic sanctions have by far the most implications for a sanctions compliance program. |
| 673faacea0b-c62e-4a5b-b9be-63a0097e88bf | Not Translated (0%) | Facilitation | Facilitation |
| 674f5c43275-f130-4d70-b200-4590826b2d1a | Not Translated (0%) | A different restriction, which can have a broad geographic reach, concerns activities described under the US sanctions regime as facilitation, or “approval.” | A different restriction, which can have a broad geographic reach, concerns activities described under the US sanctions regime as facilitation, or “approval.” |
| 675f5c43275-f130-4d70-b200-4590826b2d1a | Not Translated (0%) | The prohibition on facilitation is found in 31 CFR 506.208 and reads: | The prohibition on facilitation is found in 31 CFR 506.208 and reads: |
| 67631c56d93-be12-4f67-9728-cb749c8f05ce | Not Translated (0%) | Except as otherwise authorized pursuant to this part, and notwithstanding any contract entered into or any license or permit granted prior to May 7, 1995, no United States person, wherever located, may approve, finance, facilitate, or guarantee any transaction by a foreign person where the transaction by that foreign person would be prohibited by this part if performed by a United States person or within the United States. | Except as otherwise authorized pursuant to this part, and notwithstanding any contract entered into or any license or permit granted prior to May 7, 1995, no United States person, wherever located, may approve, finance, facilitate, or guarantee any transaction by a foreign person where the transaction by that foreign person would be prohibited by this part if performed by a United States person or within the United States. |
| 67734f5dc9a-4713-4a2b-acea-eaff01b0b58b | Not Translated (0%) | This essentially means that a US person may not facilitate or assist the activities of a non-US person if those activities would violate sanctions if the non-US person were a US person. | This essentially means that a US person may not facilitate or assist the activities of a non-US person if those activities would violate sanctions if the non-US person were a US person. |
| 67834f5dc9a-4713-4a2b-acea-eaff01b0b58b | Not Translated (0%) | This applies to US persons located anywhere in the world. | This applies to US persons located anywhere in the world. |
| 67934f5dc9a-4713-4a2b-acea-eaff01b0b58b | Not Translated (0%) | In other words, a US person cannot do indirectly what he or she is directly prohibited from doing. | In other words, a US person cannot do indirectly what he or she is directly prohibited from doing. |
| 68007299b07-316b-4357-abe7-41aa5d428788 | Not Translated (0%) | This offense has attracted particular attention when financial institutions and other companies have employed members of senior management who are considered US persons under the US sanctions regimes, as well as when US consultants have worked overseas for financial institutions. | This offense has attracted particular attention when financial institutions and other companies have employed members of senior management who are considered US persons under the US sanctions regimes, as well as when US consultants have worked overseas for financial institutions. |
| 6811d08d499-09ad-4bb1-874a-847ee4233963 | Not Translated (0%) | A simple example of facilitation would be if a US citizen, working as director of a European company, took part in a business decision to enter a deal with a company in Iran. | A simple example of facilitation would be if a US citizen, working as director of a European company, took part in a business decision to enter a deal with a company in Iran. |
| 6821d08d499-09ad-4bb1-874a-847ee4233963 | Not Translated (0%) | Other types of facilitation would include US employees working for a branch in the US and advising its parent overseas on conducting transactions that would otherwise be prohibited if they were to engage in them. | Other types of facilitation would include US employees working for a branch in the US and advising its parent overseas on conducting transactions that would otherwise be prohibited if they were to engage in them. |
| 6831d08d499-09ad-4bb1-874a-847ee4233963 | Not Translated (0%) | The purpose of the prohibition of facilitation is to prevent the evasion of sanctions through indirect actions. | The purpose of the prohibition of facilitation is to prevent the evasion of sanctions through indirect actions. |
| 6841d08d499-09ad-4bb1-874a-847ee4233963 | Not Translated (0%) | Examples of prohibited activity include the following, among others: | Examples of prohibited activity include the following, among others: |
| 68515a91369-6b79-42b8-9e10-1f45d3adeda5 | Not Translated (0%) | US parties may not approve, finance, or guarantee any transaction in which they themselves are prohibited from engaging. | US parties may not approve, finance, or guarantee any transaction in which they themselves are prohibited from engaging. |
| 68620c2dff1-557d-4459-bf3f-7fb54b89abfc | Not Translated (0%) | US parties may not provide merchandise to be used in connection with a prohibited transaction or make a purchase for the benefit of a prohibited transaction. | US parties may not provide merchandise to be used in connection with a prohibited transaction or make a purchase for the benefit of a prohibited transaction. |
| 6878738fd4e-a79f-4ab7-ad55-05d1764a6309 | Not Translated (0%) | US parties may not provide services in support of or in connection with prohibited activity. | US parties may not provide services in support of or in connection with prohibited activity. |
| 688780be532-b35f-4b4e-bae3-e88b3bdcf6db | Not Translated (0%) | US parties may not provide guidance on prohibited activity. | US parties may not provide guidance on prohibited activity. |
| 68971251df9-e720-4ed0-9cf6-657a949632dd | Not Translated (0%) | US parties may not alter their corporate policies to allow for prohibited transactions. | US parties may not alter their corporate policies to allow for prohibited transactions. |
| 6900ac30e7b-f552-4902-9e8e-10913c66b6ce | Not Translated (0%) | US parties may not refer business to a foreign person that would involve a prohibited transaction. | US parties may not refer business to a foreign person that would involve a prohibited transaction. |
| 69106447aed-90ee-428c-802c-29dd40750543 | Not Translated (0%) | Shearman and Sterling LLP, “‘Facilitation’: | Shearman and Sterling LLP, “‘Facilitation’: |
| 69206447aed-90ee-428c-802c-29dd40750543 | Not Translated (0%) | A New Tool for Extraterritorial Sanctions Enforcement?” | A New Tool for Extraterritorial Sanctions Enforcement?” |
| 69306447aed-90ee-428c-802c-29dd40750543 | Not Translated (0%) | April 17, 2015 | April 17, 2015 |
| 694e656db1b-d948-4927-810a-7a6aa73ca557 | Not Translated (0%) | At the other end of the spectrum of conduct, activities that are purely clerical or reporting related, such as reporting on a subsidiary’s trade with a sanctioned country, would not necessarily constitute facilitation. | At the other end of the spectrum of conduct, activities that are purely clerical or reporting related, such as reporting on a subsidiary’s trade with a sanctioned country, would not necessarily constitute facilitation. |
| 6955c3de174-d451-47ac-8dc7-9af9436d7647 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 6965c3de174-d451-47ac-8dc7-9af9436d7647 | Not Translated (0%) | SCHLUMBERGER OILFIELD | SCHLUMBERGER OILFIELD |
| 69739829437-7e50-4822-903a-bb05a957c0f6 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 698ff89219f-81a5-406d-a301-fc878bbbf56c | Not Translated (0%) | Schlumberger Oilfield Holdings, Ltd. (“Schlumberger Oilfield”) is incorporated in the British Virgin Islands but has its headquarters in Houston, Texas. | Schlumberger Oilfield Holdings, Ltd. (“Schlumberger Oilfield”) is incorporated in the British Virgin Islands but has its headquarters in Houston, Texas. |
| 699ff89219f-81a5-406d-a301-fc878bbbf56c | Not Translated (0%) | It is a direct subsidiary of Schlumberger Ltd., a multibillion-dollar oil and gas conglomerate. | It is a direct subsidiary of Schlumberger Ltd., a multibillion-dollar oil and gas conglomerate. |
| 700ff89219f-81a5-406d-a301-fc878bbbf56c | Not Translated (0%) | Schlumberger Ltd. is incorporated in the Netherlands Antilles/Curaçao. | Schlumberger Ltd. is incorporated in the Netherlands Antilles/Curaçao. |
| 701d9651393-e876-4227-a0bf-489750422e0f | Not Translated (0%) | Beginning in February 2004 Schlumberger Ltd. worked with Schlumberger Oilfield’s Drilling and Measurement segment in Houston. | Beginning in February 2004 Schlumberger Ltd. worked with Schlumberger Oilfield’s Drilling and Measurement segment in Houston. |
| 702d9651393-e876-4227-a0bf-489750422e0f | Not Translated (0%) | By doing so, Schlumberger Oilfield knowingly violated sanctions by: | By doing so, Schlumberger Oilfield knowingly violated sanctions by: |
| 7037e7c3ab1-96c5-40aa-8ce5-19ea66fd15bb | Not Translated (0%) | “Systematically approving and disguising capital expenditure requests from operations in Iran and Sudan for the manufacture of new tools and for certain expenditures; | “Systematically approving and disguising capital expenditure requests from operations in Iran and Sudan for the manufacture of new tools and for certain expenditures; |
| 7040836b2e4-5b83-42bf-85fc-a2292683a96a | Not Translated (0%) | Directing and overseeing the transfer of oilfield equipment from projects in non-sanctioned countries to projects in Iran and Sudan; | Directing and overseeing the transfer of oilfield equipment from projects in non-sanctioned countries to projects in Iran and Sudan; |
| 705cdc21410-ca63-46f1-ae85-134e4ee88f86 | Not Translated (0%) | Making and implementing business decisions specifically concerning projects in Iran and Sudan; and | Making and implementing business decisions specifically concerning projects in Iran and Sudan; and |
| 70635375ecb-05ff-49c3-af2d-78c37f933739 | Not Translated (0%) | Providing certain technical services in order to troubleshoot mechanical failures and to sustain sophisticated oilfield services equipment in Iran and Sudan.” | Providing certain technical services in order to troubleshoot mechanical failures and to sustain sophisticated oilfield services equipment in Iran and Sudan.” |
| 707841898b0-b095-44aa-ad61-f113975a5941 | Not Translated (0%) | US Department of the Treasury, Enforcement Information for August 7, 2015. | US Department of the Treasury, Enforcement Information for August 7, 2015. |
| 7083d6db8ec-61ae-402d-b71e-b3ad4f0ab4c3 | Not Translated (0%) | While the Houston operations did not directly engage in this activity, it provided support to its parent company to facilitate transactions that it could not do itself. | While the Houston operations did not directly engage in this activity, it provided support to its parent company to facilitate transactions that it could not do itself. |
| 709e3960253-32e2-4c50-9771-4834266319ff | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 710f912210f-2978-4eae-b38e-61455778e4e7 | Not Translated (0%) | Facilitation is a concept that applies to US persons not directly engaged in sanctioned activity. | Facilitation is a concept that applies to US persons not directly engaged in sanctioned activity. |
| 71171a4a3d0-6225-46cb-a983-dcab6d1e78c6 | Not Translated (0%) | Facilitation is a broad concept that may encompass a variety of activities, such as overseeing the transfer of equipment for a non-US person to sanctioned locations. | Facilitation is a broad concept that may encompass a variety of activities, such as overseeing the transfer of equipment for a non-US person to sanctioned locations. |
| 71276fd3cab-6360-418d-b924-fff8d15f1754 | Not Translated (0%) | US persons are prohibited from making business decisions on behalf of non-US persons for projects in sanctioned countries. | US persons are prohibited from making business decisions on behalf of non-US persons for projects in sanctioned countries. |
| 71343cf9a38-afcd-42e4-ae9b-460c81057421 | Not Translated (0%) | Providing technical or advisory expertise for operations in sanctioned countries may be prohibited as facilitation. | Providing technical or advisory expertise for operations in sanctioned countries may be prohibited as facilitation. |
| 714d7b42499-06ec-48ac-a3d9-65bdba4e447e | Not Translated (0%) | Extraterritoriality of Sanctions Program | Extraterritoriality of Sanctions Program |
| 7159c733d79-829b-43e3-adcf-ecaeaafa4c15 | Not Translated (0%) | Extraterritorial jurisdiction, or “extraterritoriality,” is the ability of a state to make, apply, and enforce laws, regulations, and other rules of conduct in respect to persons, property, or activity beyond its territory. | Extraterritorial jurisdiction, or “extraterritoriality,” is the ability of a state to make, apply, and enforce laws, regulations, and other rules of conduct in respect to persons, property, or activity beyond its territory. |
| 7169c733d79-829b-43e3-adcf-ecaeaafa4c15 | Not Translated (0%) | The US is the primary government engaged in applying extraterritoriality to its sanctions regime. | The US is the primary government engaged in applying extraterritoriality to its sanctions regime. |
| 7179c733d79-829b-43e3-adcf-ecaeaafa4c15 | Not Translated (0%) | The EU, believing that the practice of extraterritoriality violates international law, does not allow for the concept of extraterritoriality in relation to the sanctions restrictions it imposes. | The EU, believing that the practice of extraterritoriality violates international law, does not allow for the concept of extraterritoriality in relation to the sanctions restrictions it imposes. |
| 7189c733d79-829b-43e3-adcf-ecaeaafa4c15 | Not Translated (0%) | The EU describes extraterritorial sanctions as sanctions that “non-US citizens and companies are also expected to comply with” outside the jurisdiction of the US. | The EU describes extraterritorial sanctions as sanctions that “non-US citizens and companies are also expected to comply with” outside the jurisdiction of the US. |
| 7199c733d79-829b-43e3-adcf-ecaeaafa4c15 | Not Translated (0%) | These sanctions are also known as “secondary sanctions” as opposed to “primary sanctions.” | These sanctions are also known as “secondary sanctions” as opposed to “primary sanctions.” |
| 720247855d2-dcc1-45ad-84b8-69d0cf90f670 | Not Translated (0%) | As stated previously, in its 2012 Guidelines on Implementation and Evaluation of Sanctions, the EU expressly states that the sanctions it imposes will apply only where links to the EU are present (primary sanctions). | As stated previously, in its 2012 Guidelines on Implementation and Evaluation of Sanctions, the EU expressly states that the sanctions it imposes will apply only where links to the EU are present (primary sanctions). |
| 721247855d2-dcc1-45ad-84b8-69d0cf90f670 | Not Translated (0%) | The EU also follows this concept when it is implementing sanctions introduced by the UN. | The EU also follows this concept when it is implementing sanctions introduced by the UN. |
| 722247855d2-dcc1-45ad-84b8-69d0cf90f670 | Not Translated (0%) | The purpose for secondary sanctions stems from globalization weakening the impact of primary sanctions as alternative finance and trade become more available. | The purpose for secondary sanctions stems from globalization weakening the impact of primary sanctions as alternative finance and trade become more available. |
| 723b1742405-aede-4f75-930f-02c3c1ba7623 | Not Translated (0%) | However, people often misunderstand the idea of extraterritoriality, taking it to mean that the restrictions imposed by EU sanctions cannot apply to persons or activities once they are outside of the EU’s geographic borders. | However, people often misunderstand the idea of extraterritoriality, taking it to mean that the restrictions imposed by EU sanctions cannot apply to persons or activities once they are outside of the EU’s geographic borders. |
| 724b1742405-aede-4f75-930f-02c3c1ba7623 | Not Translated (0%) | In fact, restrictions imposed by the EU apply to all EU persons, wherever they are in the world. | In fact, restrictions imposed by the EU apply to all EU persons, wherever they are in the world. |
| 7253c8c09f2-d280-4499-9747-d289da3dbb39 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7263c8c09f2-d280-4499-9747-d289da3dbb39 | Not Translated (0%) | HONDA FINANCE, 2017 | HONDA FINANCE, 2017 |
| 727c80ed606-258c-4f3c-90ac-471376a05210 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 72859bb2baa-c913-4ef6-be46-05960101e0e3 | Not Translated (0%) | American Honda Finance Corporation (AHFC) entered into a settlement agreement for $87,255 to settle its potential liability regarding 13 transactions that appeared to violate the US sanctions against Cuba. | American Honda Finance Corporation (AHFC) entered into a settlement agreement for $87,255 to settle its potential liability regarding 13 transactions that appeared to violate the US sanctions against Cuba. |
| 72959bb2baa-c913-4ef6-be46-05960101e0e3 | Not Translated (0%) | AHFC is headquartered in California, United States, and is a motor vehicle finance company. | AHFC is headquartered in California, United States, and is a motor vehicle finance company. |
| 73059bb2baa-c913-4ef6-be46-05960101e0e3 | Not Translated (0%) | AHFC has a majority-owned subsidiary, Honda Canada Finance, located in Canada. | AHFC has a majority-owned subsidiary, Honda Canada Finance, located in Canada. |
| 73159bb2baa-c913-4ef6-be46-05960101e0e3 | Not Translated (0%) | Between February 2011 and March 2014, Honda Finance Canada financed 13 lease agreements between an unaffiliated Honda dealership in Ottawa, Canada, and the Embassy of Cuba. | Between February 2011 and March 2014, Honda Finance Canada financed 13 lease agreements between an unaffiliated Honda dealership in Ottawa, Canada, and the Embassy of Cuba. |
| 73259bb2baa-c913-4ef6-be46-05960101e0e3 | Not Translated (0%) | AHFC voluntarily disclosed the transactions, and OFAC determined the violations were non-egregious. | AHFC voluntarily disclosed the transactions, and OFAC determined the violations were non-egregious. |
| 733b252e78e-1a49-48e8-969c-0435079f8c44 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 7340fa38bd9-7181-4a89-91f4-c70ab6915cdd | Not Translated (0%) | US sanctions programs may apply to subsidiaries of US companies operating outside of the jurisdiction of the US, for example, Cuban and Iranian programs. | US sanctions programs may apply to subsidiaries of US companies operating outside of the jurisdiction of the US, for example, Cuban and Iranian programs. |
| 7350fa38bd9-7181-4a89-91f4-c70ab6915cdd | Not Translated (0%) | Sanctions compliance programs should understand the full scope and applicability of sanctions programs based on their risk exposure. | Sanctions compliance programs should understand the full scope and applicability of sanctions programs based on their risk exposure. |
| 736abbcecf3-6f1e-4c28-a3d3-af1cf97e06e8 | Not Translated (0%) | Financing provided between an unaffiliated company and a sanctioned entity falls within the scope of US sanctions. | Financing provided between an unaffiliated company and a sanctioned entity falls within the scope of US sanctions. |
| 7371d71b588-ec38-4161-b04f-33cd82651aeb | Not Translated (0%) | In relation to US embargoes, the US application of extraterritoriality forbids non-US persons to export goods that are of US origin, or contain content or part of US origin, to embargoed countries. | In relation to US embargoes, the US application of extraterritoriality forbids non-US persons to export goods that are of US origin, or contain content or part of US origin, to embargoed countries. |
| 7381d71b588-ec38-4161-b04f-33cd82651aeb | Not Translated (0%) | This prohibition of re-exports has a broad reach. | This prohibition of re-exports has a broad reach. |
| 7391d71b588-ec38-4161-b04f-33cd82651aeb | Not Translated (0%) | While licenses can be obtained to allow for these transactions, as a general policy these licenses are denied. | While licenses can be obtained to allow for these transactions, as a general policy these licenses are denied. |
| 7404bfeefef-bb68-43b0-862c-796d8f1ad833 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7414bfeefef-bb68-43b0-862c-796d8f1ad833 | Not Translated (0%) | EPSILON, 2014 | EPSILON, 2014 |
| 74271f05dd9-8563-4886-9359-a23e14c15129 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 7436267e5e2-ad3a-4e15-af51-9f27dd316a29 | Not Translated (0%) | Epsilon Electronics Inc. settled its potential civil liability for doing business in violation of the Iranian Transactions and Sanctions Regulations for $1,500,000. | Epsilon Electronics Inc. settled its potential civil liability for doing business in violation of the Iranian Transactions and Sanctions Regulations for $1,500,000. |
| 7446267e5e2-ad3a-4e15-af51-9f27dd316a29 | Not Translated (0%) | The penalty arose from invoices issued between August 2008 and May 2012 for sales to Asra International LLC, a.k.a. Asra Electronic Trading Co. OFAC found that Epsilon “knew or had reason to know that [Asra International LLC] distributed most, if not all, of its products to Iran.” | The penalty arose from invoices issued between August 2008 and May 2012 for sales to Asra International LLC, a.k.a. Asra Electronic Trading Co. OFAC found that Epsilon “knew or had reason to know that [Asra International LLC] distributed most, if not all, of its products to Iran.” |
| 745774a6689-4f97-4d94-9eb0-09e45e76eadb | Not Translated (0%) | US Department of the Treasury, Enforcement Information for September 3, 2018 | US Department of the Treasury, Enforcement Information for September 3, 2018 |
| 7469ae647ee-0da4-422a-8883-e06b3b515141 | Not Translated (0%) | As revealed in Epsilon’s appeal, Asra’s website “touted the company’s success in the Iranian market, contained a directory of dealers who were all located in Iran, and displayed photos from trade shows in various Iranian cities.” | As revealed in Epsilon’s appeal, Asra’s website “touted the company’s success in the Iranian market, contained a directory of dealers who were all located in Iran, and displayed photos from trade shows in various Iranian cities.” |
| 7479ae647ee-0da4-422a-8883-e06b3b515141 | Not Translated (0%) | The website also included a “Contact Us” page with only two addresses, one in Dubai and the other in Tehran, Iran. | The website also included a “Contact Us” page with only two addresses, one in Dubai and the other in Tehran, Iran. |
| 7489ae647ee-0da4-422a-8883-e06b3b515141 | Not Translated (0%) | Epsilon, in turn, had copied images found on Asra’s website and displayed them on its website under the label “Iran.” | Epsilon, in turn, had copied images found on Asra’s website and displayed them on its website under the label “Iran.” |
| 7499ae647ee-0da4-422a-8883-e06b3b515141 | Not Translated (0%) | Additionally, Epsilon had a 2008 freight manifest that included a record of a shipment from its address directly to Asra’s Tehran address. | Additionally, Epsilon had a 2008 freight manifest that included a record of a shipment from its address directly to Asra’s Tehran address. |
| 750ceb4695d-c54d-4b66-8277-d43e0ac1cabd | Not Translated (0%) | Leagle, Epsilon Electronics, Inc. v. US Dept of Treasury, May 26, 2017. | Leagle, Epsilon Electronics, Inc. v. US Dept of Treasury, May 26, 2017. |
| 75116151785-5282-40fc-bac4-f39b45d7489e | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 7529c03daf4-32ab-4318-9310-4401f3681b84 | Not Translated (0%) | The export/re-export provision covers exports where the company “knew or had reason to know” the final destination was a sanctioned target. | The export/re-export provision covers exports where the company “knew or had reason to know” the final destination was a sanctioned target. |
| 7534151a55e-6ba1-4692-9000-0df1d2128b7a | Not Translated (0%) | The application of “reason to know” is very fact-based. | The application of “reason to know” is very fact-based. |
| 75496bf7ee1-2d3b-4df8-8e93-0f19e3629536 | Not Translated (0%) | BLOCKING STATUTES | BLOCKING STATUTES |
| 755718f3673-d5a4-4945-88f3-aba97a3a5df5 | Not Translated (0%) | In 1996, largely as a countermeasure to the US extraterritorial sanctions against Cuba and Iran, the EU passed legislation to address the US application of extraterritoriality. | In 1996, largely as a countermeasure to the US extraterritorial sanctions against Cuba and Iran, the EU passed legislation to address the US application of extraterritoriality. |
| 756718f3673-d5a4-4945-88f3-aba97a3a5df5 | Not Translated (0%) | This is referred to as the “blocking regulation.” | This is referred to as the “blocking regulation.” |
| 757718f3673-d5a4-4945-88f3-aba97a3a5df5 | Not Translated (0%) | It can be found in Regulation (EC) No. 2271/96. | It can be found in Regulation (EC) No. 2271/96. |
| 758718f3673-d5a4-4945-88f3-aba97a3a5df5 | Not Translated (0%) | These regulations essentially ban Member States from complying or assisting the US in enforcing the restrictions imposed under these sanctions. | These regulations essentially ban Member States from complying or assisting the US in enforcing the restrictions imposed under these sanctions. |
| 759718f3673-d5a4-4945-88f3-aba97a3a5df5 | Not Translated (0%) | Up until May 2018, the legislation was largely ignored. | Up until May 2018, the legislation was largely ignored. |
| 7601193baff-6373-460c-aa84-1e7ac104fe1e | Not Translated (0%) | On May 8, 2018, US president Donald J. Trump announced his decision to cease US participation in the Joint Comprehensive Plan of Action (JCPOA), or Iran nuclear deal, and to begin re-imposing the US nuclear-related sanctions that had been lifted as part of that agreement. | On May 8, 2018, US president Donald J. Trump announced his decision to cease US participation in the Joint Comprehensive Plan of Action (JCPOA), or Iran nuclear deal, and to begin re-imposing the US nuclear-related sanctions that had been lifted as part of that agreement. |
| 7611193baff-6373-460c-aa84-1e7ac104fe1e | Not Translated (0%) | In response, the European Commission launched the process to activate the EU blocking regulation by updating the list of US sanctions on Iran falling within its scope. | In response, the European Commission launched the process to activate the EU blocking regulation by updating the list of US sanctions on Iran falling within its scope. |
| 7621193baff-6373-460c-aa84-1e7ac104fe1e | Not Translated (0%) | Once the re-imposed US sanctions were added, the blocking regulation required companies incorporated in EU Member States to: | Once the re-imposed US sanctions were added, the blocking regulation required companies incorporated in EU Member States to: |
| 763b8637ae0-bf58-412f-8bbd-800cf914b077 | Not Translated (0%) | Notify the European Commission within 30 days whenever the renewed US sanctions directly or indirectly affect their economic or financial interests; | Notify the European Commission within 30 days whenever the renewed US sanctions directly or indirectly affect their economic or financial interests; |
| 7649dd43433-5122-47a3-9441-b4c87f7d6394 | Not Translated (0%) | Not comply with the extraterritorial effects of these listed US sanctions, and | Not comply with the extraterritorial effects of these listed US sanctions, and |
| 765f26d627b-1a15-41c2-9683-e761c90a24ed | Not Translated (0%) | Not enforce, within in the EU, any foreign court judgments or decisions of administrative bodies, such as OFAC, based on the reinstated US sanctions. | Not enforce, within in the EU, any foreign court judgments or decisions of administrative bodies, such as OFAC, based on the reinstated US sanctions. |
| 766069bd09f-5eff-44e4-bd36-5a39fba09882 | Not Translated (0%) | Article 5 of the Blocking Regulation does provide a mechanism for EU companies to ask the European Commission for an exemption to the regulation “if they can demonstrate that compliance with the regulation would ‘seriously damage their interests’ or the interests of the EU.” | Article 5 of the Blocking Regulation does provide a mechanism for EU companies to ask the European Commission for an exemption to the regulation “if they can demonstrate that compliance with the regulation would ‘seriously damage their interests’ or the interests of the EU.” |
| 767b8f3eb58-b9dd-4307-8539-e025794cc670 | Not Translated (0%) | European Parliament, “Updating the Blocking Regulation,” June 2018. | European Parliament, “Updating the Blocking Regulation,” June 2018. |
| 768a4a34ce6-f036-45b8-ad17-75316989593a | Not Translated (0%) | Additionally, the EU blocking regulation allows Member States of the EU to impose sanctions when there is a breach of the EU’s blocking regulation. | Additionally, the EU blocking regulation allows Member States of the EU to impose sanctions when there is a breach of the EU’s blocking regulation. |
| 769a4a34ce6-f036-45b8-ad17-75316989593a | Not Translated (0%) | Finally, the EU blocking regulation allows the EU person impacted by extraterritorial sanctions to recover damages for losses resulting from “the application of [extraterritorial sanctions] or actions based thereon or resulting therefrom.” | Finally, the EU blocking regulation allows the EU person impacted by extraterritorial sanctions to recover damages for losses resulting from “the application of [extraterritorial sanctions] or actions based thereon or resulting therefrom.” |
| 7702662a085-9fc8-44af-96f1-cd31a52797f0 | Not Translated (0%) | Other countries, such as Canada, have similar blocking regulations. | Other countries, such as Canada, have similar blocking regulations. |
| 77198a8b1a7-2178-437c-8245-fa9b6194af2d | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 77298a8b1a7-2178-437c-8245-fa9b6194af2d | Not Translated (0%) | WALMART CANADA, 1997 | WALMART CANADA, 1997 |
| 773e60b6542-c075-4276-881d-9c4fbcc5976f | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 774faeed1d0-c839-4b3c-aa5b-33f22d3ad203 | Not Translated (0%) | In March 1997, a Canadian Walmart subsidiary removed from its shelves pajamas that were made in and imported from Cuba. | In March 1997, a Canadian Walmart subsidiary removed from its shelves pajamas that were made in and imported from Cuba. |
| 775faeed1d0-c839-4b3c-aa5b-33f22d3ad203 | Not Translated (0%) | The US demanded that Walmart, a US company, comply with US sanctions by requiring its Canadian subsidiary to remove the Cuban-made pajamas. | The US demanded that Walmart, a US company, comply with US sanctions by requiring its Canadian subsidiary to remove the Cuban-made pajamas. |
| 776faeed1d0-c839-4b3c-aa5b-33f22d3ad203 | Not Translated (0%) | However, Canada’s blocking regulation prevented the Canadian subsidiary from removing the pajamas lest it face potential penalties upward of C$1.5 million for noncompliance with Canada’s countermeasures, i.e., the blocking regulation, that were designed to neutralize US sanctions. | However, Canada’s blocking regulation prevented the Canadian subsidiary from removing the pajamas lest it face potential penalties upward of C$1.5 million for noncompliance with Canada’s countermeasures, i.e., the blocking regulation, that were designed to neutralize US sanctions. |
| 777faeed1d0-c839-4b3c-aa5b-33f22d3ad203 | Not Translated (0%) | Walmart was faced with a dilemma, and after initially deciding to remove the pajamas, the threat of Canadian fines made Walmart decide that the risk of liability was greatest from the Canadian government. | Walmart was faced with a dilemma, and after initially deciding to remove the pajamas, the threat of Canadian fines made Walmart decide that the risk of liability was greatest from the Canadian government. |
| 778faeed1d0-c839-4b3c-aa5b-33f22d3ad203 | Not Translated (0%) | As a result, Walmart restocked the Cuban-made pajamas. | As a result, Walmart restocked the Cuban-made pajamas. |
| 779cb2e0a90-babf-4e20-8ab8-75ff45b4f3e5 | Not Translated (0%) | Harry Clark, “Dealing with U.S. Extraterritorial Sanctions and Foreign Countermeasures,” Penn Law: | Harry Clark, “Dealing with U.S. Extraterritorial Sanctions and Foreign Countermeasures,” Penn Law: |
| 780cb2e0a90-babf-4e20-8ab8-75ff45b4f3e5 | Not Translated (0%) | Legal Scholarship Repository, 1999. | Legal Scholarship Repository, 1999. |
| 78139a580e3-5f4e-4afd-b10b-c90aae8157ee | Not Translated (0%) | Walmart ultimately paid a fine of $50,000 to OFAC with no finding of liability. | Walmart ultimately paid a fine of $50,000 to OFAC with no finding of liability. |
| 782334212a3-1cdd-4793-931a-36c98302fb3d | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 783fb2b2f77-2613-4186-9a84-629d7fbf3e76 | Not Translated (0%) | Blocking regulations, similar to some sanctions, are a way of showing moral opposition, but may not necessarily be enforced. | Blocking regulations, similar to some sanctions, are a way of showing moral opposition, but may not necessarily be enforced. |
| 784d697a9ae-e047-4bcc-afd1-b5593d2d2e22 | Not Translated (0%) | Blocking regulations may place companies in no-win situations in which they will violate one country’s laws. | Blocking regulations may place companies in no-win situations in which they will violate one country’s laws. |
| 7856b9636a9-ce07-44ed-9376-228de6f6a78b | Not Translated (0%) | The blocking regulation in the EU has not been enforced because the US has stated unequivocally that it is willing to impose secondary sanctions on those entities violating US sanctions, even if the sanctions being violated are extraterritorial. | The blocking regulation in the EU has not been enforced because the US has stated unequivocally that it is willing to impose secondary sanctions on those entities violating US sanctions, even if the sanctions being violated are extraterritorial. |
| 7866b9636a9-ce07-44ed-9376-228de6f6a78b | Not Translated (0%) | Within this context, the EU blocking regulation is only applicable to the extent that an EU entity makes its decision not to do business with a unilaterally US–sanctioned entity “based on or resulting” from US sanctions. | Within this context, the EU blocking regulation is only applicable to the extent that an EU entity makes its decision not to do business with a unilaterally US–sanctioned entity “based on or resulting” from US sanctions. |
| 787adf15440-df81-409f-a85c-db6677ffce3e | Not Translated (0%) | This requirement allows entities to base their decisions on various other reasons, such as human rights issues. | This requirement allows entities to base their decisions on various other reasons, such as human rights issues. |
| 788adf15440-df81-409f-a85c-db6677ffce3e | Not Translated (0%) | Despite the EU blocking regulation, numerous EU companies have withdrawn their business from Iran to avoid the United States’ secondary sanctions. | Despite the EU blocking regulation, numerous EU companies have withdrawn their business from Iran to avoid the United States’ secondary sanctions. |
| 789adf15440-df81-409f-a85c-db6677ffce3e | Not Translated (0%) | The Belgian-based SWIFT, which facilitates messaging and financial transactions across the world with more than 11,000 | The Belgian-based SWIFT, which facilitates messaging and financial transactions across the world with more than 11,000 |
| 7908313b6bf-785b-4acd-b90e-36b4b2e89970 | Not Translated (0%) | financial institutions, withdrew from Iran to continue supporting the global financial system without interruption. | financial institutions, withdrew from Iran to continue supporting the global financial system without interruption. |
| 791c2d390e7-8ec7-417a-be0c-b4d768e22862 | Not Translated (0%) | Peter Eavis, “Important European Financial Firm Bows to Trump’s Iran Sanctions,” New York Times, November 5, 2018. | Peter Eavis, “Important European Financial Firm Bows to Trump’s Iran Sanctions,” New York Times, November 5, 2018. |
| 7921ec9f079-0390-4c6f-9355-8ce8187ab1da | Not Translated (0%) | Other EU companies have likewise withdrawn with no indications of the fines or penalties having been levied. | Other EU companies have likewise withdrawn with no indications of the fines or penalties having been levied. |
| 79317fbf246-cd86-490e-8acc-c27da18235bd | Not Translated (0%) | In response to the US withdrawal from the JCPOA, and in addition to the EU blocking regulation, the EU has undertaken development of a system called INSTEX. | In response to the US withdrawal from the JCPOA, and in addition to the EU blocking regulation, the EU has undertaken development of a system called INSTEX. |
| 79417fbf246-cd86-490e-8acc-c27da18235bd | Not Translated (0%) | INSTEX is short for “Instrument in Support of Trade Exchanges.” | INSTEX is short for “Instrument in Support of Trade Exchanges.” |
| 79517fbf246-cd86-490e-8acc-c27da18235bd | Not Translated (0%) | The concept is to create an exchange that will allow EU companies to continue trading with Iran despite US sanctions. | The concept is to create an exchange that will allow EU companies to continue trading with Iran despite US sanctions. |
| 79617fbf246-cd86-490e-8acc-c27da18235bd | Not Translated (0%) | INSTEX would match orders from Iran with equivalent orders in the EU and avoid the cross-border movement of funds. | INSTEX would match orders from Iran with equivalent orders in the EU and avoid the cross-border movement of funds. |
| 79717fbf246-cd86-490e-8acc-c27da18235bd | Not Translated (0%) | However, the utilization of INSTEX by EU entities could also result in the US imposing secondary sanctions against that entity. | However, the utilization of INSTEX by EU entities could also result in the US imposing secondary sanctions against that entity. |
| 798b9343ec2-67be-4f91-95e5-97d470524db8 | Not Translated (0%) | How Sanctions Regimes are Determined | How Sanctions Regimes are Determined |
| 799e834d7b4-7363-4d32-8d3c-06632a6e7bf5 | Not Translated (0%) | Because sanctions can target individuals, sanctioned targets can be anywhere in the world, not just in sanctioned countries or high-risk countries. | Because sanctions can target individuals, sanctioned targets can be anywhere in the world, not just in sanctioned countries or high-risk countries. |
| 800e834d7b4-7363-4d32-8d3c-06632a6e7bf5 | Not Translated (0%) | Foreign individuals and entities could also be caught by US sanctions where it is determined that they have caused others to violate a US sanction. | Foreign individuals and entities could also be caught by US sanctions where it is determined that they have caused others to violate a US sanction. |
| 801e834d7b4-7363-4d32-8d3c-06632a6e7bf5 | Not Translated (0%) | This includes activities undertaken outside of the US. | This includes activities undertaken outside of the US. |
| 802e834d7b4-7363-4d32-8d3c-06632a6e7bf5 | Not Translated (0%) | Knowledge is not a requirement—a bank operating in Poland, for example, could be in violation of a US sanctions restriction if it processes transactions involving any US–origin goods destined for Iran. | Knowledge is not a requirement—a bank operating in Poland, for example, could be in violation of a US sanctions restriction if it processes transactions involving any US–origin goods destined for Iran. |
| 803d1907ba4-6702-43e3-b631-bf5a45a4ea59 | Not Translated (0%) | Sanctions are constantly changing, as exemplified by the US entering into the JCPOA under President Obama and then exiting under President Trump. | Sanctions are constantly changing, as exemplified by the US entering into the JCPOA under President Obama and then exiting under President Trump. |
| 804a5272211-e277-4468-9aa7-f3b40c7e15f0 | Not Translated (0%) | UNITED NATIONS | UNITED NATIONS |
| 80566066ac8-efdd-4b74-b307-ac5ee022a641 | Not Translated (0%) | The United Nations administers various ongoing sanctions regimes. | The United Nations administers various ongoing sanctions regimes. |
| 80666066ac8-efdd-4b74-b307-ac5ee022a641 | Not Translated (0%) | Some of these regimes target individuals and entities specific to a Member State of the United Nations. | Some of these regimes target individuals and entities specific to a Member State of the United Nations. |
| 80766066ac8-efdd-4b74-b307-ac5ee022a641 | Not Translated (0%) | The ISIL/Al-Qaeda sanctions regime is not specific to any country or territory. | The ISIL/Al-Qaeda sanctions regime is not specific to any country or territory. |
| 80866066ac8-efdd-4b74-b307-ac5ee022a641 | Not Translated (0%) | Some countries with individuals or entities under sanctions are: | Some countries with individuals or entities under sanctions are: |
| 8093108d6df-77a8-4b75-8868-b0f709e1918b | Not Translated (0%) | Democratic People’s Republic of Korea | Democratic People’s Republic of Korea |
| 810fc03804d-7ddf-4045-aad0-1d04e336960b | Not Translated (0%) | Iran | Iran |
| 811057335da-8598-4194-95bc-ef4539bef274 | Not Translated (0%) | Libya | Libya |
| 8122a050d4a-108f-46b5-8d3b-0e39d31eddff | Not Translated (0%) | Mali | Mali |
| 8135ffc3d65-8641-409c-9106-cf4c7d2ff1ac | Not Translated (0%) | Somalia | Somalia |
| 8147091d49b-169f-4f44-beff-3ac4b671ffb8 | Not Translated (0%) | The UN also maintains its United Nations Security Council Consolidated List, which includes all persons and entities that are subject to UN sanctions. | The UN also maintains its United Nations Security Council Consolidated List, which includes all persons and entities that are subject to UN sanctions. |
| 8157091d49b-169f-4f44-beff-3ac4b671ffb8 | Not Translated (0%) | An example of a person on the list and provided information is shown in <1770/>. | An example of a person on the list and provided information is shown in <1770/>. |
| 816a14378f0-90ae-44c1-9bc1-5ed0b58805cb | Not Translated (0%) | United Nations Security Council Consolidated List. | United Nations Security Council Consolidated List. |
| 8173d1a1bd9-eead-47f1-9fa2-f6347414342a | Not Translated (0%) | United Nations Security Council Consolidated List | United Nations Security Council Consolidated List |
| 81893b6909d-7964-4ae6-8693-77ba86bb8f0b | Not Translated (0%) | TAi.159 Name: | TAi.159 Name: |
| 81995dfdcb7-e1aa-4224-8d59-c28ba156db69 | Not Translated (0%) | 1: | 1: |
| 82095dfdcb7-e1aa-4224-8d59-c28ba156db69 | Not Translated (0%) | ABDUL JAN 2: | ABDUL JAN 2: |
| 82195dfdcb7-e1aa-4224-8d59-c28ba156db69 | Not Translated (0%) | WAZIR 3: | WAZIR 3: |
| 82295dfdcb7-e1aa-4224-8d59-c28ba156db69 | Not Translated (0%) | SALIH MOHAMMAD 4: na | SALIH MOHAMMAD 4: na |
| 8232bbc073d-c080-4abf-9073-578ab000367e | Not Translated (0%) | Name (original script): | Name (original script): |
| 824fc390c14-fb89-4c0b-be9a-221660f756ec | Not Translated (0%) | احید جحان زیرمح اخوتر مد | احید جحان زیرمح اخوتر مد |
| 825e1320131-54c1-48dd-8976-b2bf3e802b15 | Not Translated (0%) | Title: | Title: |
| 826aedb7c85-aabc-4d23-bda8-31a2895ae639 | Not Translated (0%) | na | na |
| 8274c9e6ec2-9326-435b-8170-b198d7f25ef1 | Not Translated (0%) | Designation: | Designation: |
| 82883a0047f-5e50-4f21-91c0-f3077ac8cdf7 | Not Translated (0%) | Official of the Ministry of Finance during the Taliban regime | Official of the Ministry of Finance during the Taliban regime |
| 82950f6ae9c-fef3-4a9a-bd38-192cc80a0588 | Not Translated (0%) | DOB: | DOB: |
| 83036c21f75-867e-408c-bf3e-869e2339602d | Not Translated (0%) | 1966 | 1966 |
| 831812bb0db-52bd-4b07-abca-c15523e3e178 | Not Translated (0%) | POB: | POB: |
| 83248793024-abc7-4f1c-aeda-36aea9dd21f6 | Not Translated (0%) | Barlach Village, Qareh Bagh District, Ghazni Province, Afghanistan Good quality | Barlach Village, Qareh Bagh District, Ghazni Province, Afghanistan Good quality |
| 8335495ed71-8a38-4aae-9cd6-81a56007018d | Not Translated (0%) | a.k.a.: | a.k.a.: |
| 834018a2009-6b99-4999-a505-fa3d77c6d1c6 | Not Translated (0%) | a) Abdul Jan Salih b) Abdul Jan Salih Low quality a.k.a.: na | a) Abdul Jan Salih b) Abdul Jan Salih Low quality a.k.a.: na |
| 8359c38d592-cc7e-404b-a163-55e2f43c1c6b | Not Translated (0%) | Nationality: | Nationality: |
| 8362b5482f2-3d45-41eb-8245-793e648adda1 | Not Translated (0%) | na | na |
| 83713fb4508-acdb-4b7b-9bc4-b98ab4466174 | Not Translated (0%) | Address: | Address: |
| 83866d42a0a-7fbd-46fc-815f-1b27b3de3d0b | Not Translated (0%) | na | na |
| 839c62dc47c-e4f6-40d2-8aaa-4a0633c0eb5d | Not Translated (0%) | Listed on: | Listed on: |
| 840f5004c37-8115-4d2a-b8a8-60c746ff4c78 | Not Translated (0%) | 6 Jan. 2012 ( amended on 31 Dec. 2013, 11 Feb. 2014 ) | 6 Jan. 2012 ( amended on 31 Dec. 2013, 11 Feb. 2014 ) |
| 841add4b623-c2bf-43f6-b164-469bc46cd9eb | Not Translated (0%) | Other information: | Other information: |
| 8421d03953b-e037-47bb-9ade-45eb04e1029c | Not Translated (0%) | Key commander of the Haqqani Network (TAe.400), which is based in Afghanistan/Pakistan border area. | Key commander of the Haqqani Network (TAe.400), which is based in Afghanistan/Pakistan border area. |
| 8431d03953b-e037-47bb-9ade-45eb04e1029c | Not Translated (0%) | Acts as deputy, spokesperson and advisor for Haqqani Network senior leader Sirajuddin Agha Barakzai(TAi.192). | Acts as deputy, spokesperson and advisor for Haqqani Network senior leader Sirajuddin Agha Barakzai(TAi.192). |
| 8441d03953b-e037-47bb-9ade-45eb04e1029c | Not Translated (0%) | Liaises with the Taliban Supreme Council. | Liaises with the Taliban Supreme Council. |
| 8451d03953b-e037-47bb-9ade-45eb04e1029c | Not Translated (0%) | Has travelled abroad. | Has travelled abroad. |
| 8461d03953b-e037-47bb-9ade-45eb04e1029c | Not Translated (0%) | Liaises with and provides Taliban commanders in Ghazni Province, Afghanistan, with money, weapons, communications equipment and supplies. | Liaises with and provides Taliban commanders in Ghazni Province, Afghanistan, with money, weapons, communications equipment and supplies. |
| 8471d03953b-e037-47bb-9ade-45eb04e1029c | Not Translated (0%) | Reportedly deceased as of 2013. | Reportedly deceased as of 2013. |
| 8481d03953b-e037-47bb-9ade-45eb04e1029c | Not Translated (0%) | INTERPOL-UN Security Council Special Notice web link: | INTERPOL-UN Security Council Special Notice web link: |
| 849d1399cb3-a2b9-4c46-a000-77438f27c740 | Not Translated (0%) | Additionally, users can download lists and search names within the UN website and determine whether the person or entity is on the UN list. | Additionally, users can download lists and search names within the UN website and determine whether the person or entity is on the UN list. |
| 8501d263a01-205a-4bc0-8c60-cde1b1f7d703 | Not Translated (0%) | UNITED STATES | UNITED STATES |
| 8515394f5a3-74d8-4e25-937d-867d8acace64 | Not Translated (0%) | The US OFAC administers various sanctions programs, which are either comprehensive or targeted. | The US OFAC administers various sanctions programs, which are either comprehensive or targeted. |
| 8525394f5a3-74d8-4e25-937d-867d8acace64 | Not Translated (0%) | Examples of those targeted sanctions include Counter Narcotics Trafficking Sanctions, Global Magnitsky Sanctions, and Transnational Criminal Organization sanctions. | Examples of those targeted sanctions include Counter Narcotics Trafficking Sanctions, Global Magnitsky Sanctions, and Transnational Criminal Organization sanctions. |
| 8535394f5a3-74d8-4e25-937d-867d8acace64 | Not Translated (0%) | Examples of comprehensive sanctions include Iran Sanctions and North Korea Sanctions. | Examples of comprehensive sanctions include Iran Sanctions and North Korea Sanctions. |
| 8545394f5a3-74d8-4e25-937d-867d8acace64 | Not Translated (0%) | The entire list of OFAC sanctions regimes can be found on OFAC’s website. | The entire list of OFAC sanctions regimes can be found on OFAC’s website. |
| 855ae52703c-0011-4f34-b588-82669b76bf37 | Not Translated (0%) | Moreover, OFAC administers the widely known Specially Designated Nationals and Blocked Persons list, commonly referred to as the SDN list. | Moreover, OFAC administers the widely known Specially Designated Nationals and Blocked Persons list, commonly referred to as the SDN list. |
| 856ae52703c-0011-4f34-b588-82669b76bf37 | Not Translated (0%) | This is a published list of individuals and companies “owned or controlled by, or acting for or on behalf of, targeted countries.” | This is a published list of individuals and companies “owned or controlled by, or acting for or on behalf of, targeted countries.” |
| 857ae52703c-0011-4f34-b588-82669b76bf37 | Not Translated (0%) | It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers, designated under programs that are not country-specific. | It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers, designated under programs that are not country-specific. |
| 858ae52703c-0011-4f34-b588-82669b76bf37 | Not Translated (0%) | Collectively, such individuals and companies are called “specially designated nationals” or SDNs. | Collectively, such individuals and companies are called “specially designated nationals” or SDNs. |
| 859ae52703c-0011-4f34-b588-82669b76bf37 | Not Translated (0%) | Their assets are blocked and US persons are generally prohibited from dealing with them.” | Their assets are blocked and US persons are generally prohibited from dealing with them.” |
| 8609fbe142e-5de8-4464-bca3-c6bfcf2de7c5 | Not Translated (0%) | US Department of the Treasury, Resource Center. | US Department of the Treasury, Resource Center. |
| 8611a697c21-d552-4d22-884b-26249fac6dfb | Not Translated (0%) | The list is frequently updated. | The list is frequently updated. |
| 862d8dbf4f4-4137-4100-98cb-98d350a1675d | Not Translated (0%) | Sanctions lists include names and as many identifiers as possible. | Sanctions lists include names and as many identifiers as possible. |
| 863d8dbf4f4-4137-4100-98cb-98d350a1675d | Not Translated (0%) | This is to avoid problems that may result due to homonyms and near-identical names (i.e., mistaken identity). | This is to avoid problems that may result due to homonyms and near-identical names (i.e., mistaken identity). |
| 864d8dbf4f4-4137-4100-98cb-98d350a1675d | Not Translated (0%) | For natural persons, this may include surname and first name, spelling in original language, transliterations, aliases, date of birth, place of birth, nationality, address, and identification numbers, such as a passport number. | For natural persons, this may include surname and first name, spelling in original language, transliterations, aliases, date of birth, place of birth, nationality, address, and identification numbers, such as a passport number. |
| 865d8dbf4f4-4137-4100-98cb-98d350a1675d | Not Translated (0%) | For non-natural persons, information should seek to include full legal entity name, principal place of business and place of registration, and any identification numbers, such as a tax identification number. | For non-natural persons, information should seek to include full legal entity name, principal place of business and place of registration, and any identification numbers, such as a tax identification number. |
| 866801fc295-4104-4fb3-98ba-6d830921c511 | Not Translated (0%) | OFAC also has a search tool that can be used to screen names. | OFAC also has a search tool that can be used to screen names. |
| 86737c9604d-deee-4cf2-acbb-088e2980948a | Not Translated (0%) | EUROPEAN UNION | EUROPEAN UNION |
| 86865490dcd-69c6-4af8-bf0c-8a823b4a9e09 | Not Translated (0%) | EU sanctions in force include those issued by the United Nations as well as the autonomous sanctions issued by the European Union. | EU sanctions in force include those issued by the United Nations as well as the autonomous sanctions issued by the European Union. |
| 86965490dcd-69c6-4af8-bf0c-8a823b4a9e09 | Not Translated (0%) | The EU has the second-highest number of active sanctions programs, second only to the US. | The EU has the second-highest number of active sanctions programs, second only to the US. |
| 87065490dcd-69c6-4af8-bf0c-8a823b4a9e09 | Not Translated (0%) | The EU provides an EU Sanctions Map for an overview of its various active sanctions programs. | The EU provides an EU Sanctions Map for an overview of its various active sanctions programs. |
| 87165490dcd-69c6-4af8-bf0c-8a823b4a9e09 | Not Translated (0%) | The EU sanctions programs are categorized by: | The EU sanctions programs are categorized by: |
| 872b5130fe1-cd26-4e37-85f0-3f637788f90c | Not Translated (0%) | Those adopted by the EU and UN | Those adopted by the EU and UN |
| 8736b42fc84-e5a3-4478-a6bb-cf39bc05e160 | Not Translated (0%) | Thematic overviews | Thematic overviews |
| 874b0765e89-663e-47fe-a622-9998e0b22efd | Not Translated (0%) | Chemical weapons | Chemical weapons |
| 8755b076bfe-abb4-4b78-a790-8d5a5259e618 | Not Translated (0%) | Cyberattacks | Cyberattacks |
| 8765235cc12-5585-4ea6-b0c9-3509321a2d04 | Not Translated (0%) | Terrorism | Terrorism |
| 877be45a062-afe6-4297-9d7b-172493cd3f4a | Not Translated (0%) | Country | Country |
| 87804de6308-6caf-4e7f-9b80-d522f4a00a42 | Not Translated (0%) | Measures | Measures |
| 879eba80aa8-60db-4d37-bf5c-6b67d21962bd | Not Translated (0%) | Arms embargoes | Arms embargoes |
| 8805641f51c-054e-45e8-92d3-53b2886232a0 | Not Translated (0%) | Asset freezes | Asset freezes |
| 8810efd7ff8-122a-4115-9f05-5334d01a7afa | Not Translated (0%) | Embargoes on dual-use goods | Embargoes on dual-use goods |
| 8827e76c9f1-abb4-4805-8682-56f32ed5181f | Not Translated (0%) | Similarly to the UN, the EU also provides a consolidated list of those sanctioned, as shown in <1982/>. | Similarly to the UN, the EU also provides a consolidated list of those sanctioned, as shown in <1982/>. |
| 883ae62a348-e4f4-4274-9ab9-e4e7656fb1c5 | Not Translated (0%) | EU Consolidated List | EU Consolidated List |
| 884d1b61fec-1695-4764-b29c-28594e2ffe4c | Not Translated (0%) | EU reference number: | EU reference number: |
| 8858f5770a8-a1b3-49ca-a630-1d97a3a20ed5 | Not Translated (0%) | EU.XXXX.00 | EU.XXXX.00 |
| 886c5e10dd7-3baf-4616-9cf4-088cd2e38d36 | Not Translated (0%) | Legal basis: | Legal basis: |
| 8874752b71e-dbde-4939-be81-1e30f647f72c | Not Translated (0%) | KR Ukraine | KR Ukraine |
| 888e1c3b300-682c-48c2-8d98-55ee4d2283e4 | Not Translated (0%) | Identity information: | Identity information: |
| 8897b9f7a39-cf2d-4dd3-afe2-cf1b4b322dd5 | Not Translated (0%) | Name/Alias: | Name/Alias: |
| 8905155f4ee-1f37-4fb2-8fba-36c5ec7d038b | Not Translated (0%) | Igor Nikolaevich Mostovoy Title: | Igor Nikolaevich Mostovoy Title: |
| 8915155f4ee-1f37-4fb2-8fba-36c5ec7d038b | Not Translated (0%) | Lt. Gen. | Lt. Gen. |
| 89252ce259f-3938-4c5b-8df7-fecc45a4851d | Not Translated (0%) | Function: | Function: |
| 8938ea90981-7f64-4fad-943d-204da3278e48 | Not Translated (0%) | Former de facto Commander of Russian troops deployed on the ground in the illegally annexed Crimea (whom Russia continues to refer to officially as ‘local self-defence militias’). | Former de facto Commander of Russian troops deployed on the ground in the illegally annexed Crimea (whom Russia continues to refer to officially as ‘local self-defence militias’). |
| 8948ea90981-7f64-4fad-943d-204da3278e48 | Not Translated (0%) | Former Deputy Commander of the Southern Military District. | Former Deputy Commander of the Southern Military District. |
| 8958ea90981-7f64-4fad-943d-204da3278e48 | Not Translated (0%) | Currently, he is the Head of Department of Public Administration and National Security at the Military Academy of the Russian | Currently, he is the Head of Department of Public Administration and National Security at the Military Academy of the Russian |
| 896563e2cd7-a06f-43fd-9fd9-de8fc714f048 | Not Translated (0%) | General Staff. | General Staff. |
| 897563e2cd7-a06f-43fd-9fd9-de8fc714f048 | Not Translated (0%) | Remark: | Remark: |
| 8987c20a365-d46a-42ce-8b2c-dfd0730936a7 | Not Translated (0%) | Lt. Gen. | Lt. Gen. |
| 899bfe9a985-ef13-4e5e-8b06-04262cb143a2 | Not Translated (0%) | Name/Alias: | Name/Alias: |
| 900f1f59292-411e-452e-a258-272a8ae01c7d | Not Translated (0%) | Игорь Николаевич Мостовой | Игорь Николаевич Мостовой |
| 901ce9e78c0-cb7d-4778-b4ec-6ce210827ab2 | Not Translated (0%) | Name/Alias: | Name/Alias: |
| 902bc15ea28-147d-45bb-ba84-4a4d9ed325d0 | Not Translated (0%) | Igor Mykolayovich Mostovoy | Igor Mykolayovich Mostovoy |
| 903eb4cbf11-1782-4356-b0b4-6805a6ae2837 | Not Translated (0%) | Birth information: | Birth information: |
| 904387985d8-77fb-4924-a8c6-b131d3aec2cd | Not Translated (0%) | Birthdate | Birthdate |
| 9058a09b0ee-f30d-489e-8efd-2ab9fb5bea3e | Not Translated (0%) | 08/02/1949 | 08/02/1949 |
| 9069db96801-04c5-4dd2-84b0-83aa3f6a5196 | Not Translated (0%) | Birthplace: | Birthplace: |
| 907eed0bb0a-dc79-4275-b9d1-2866b404da26 | Not Translated (0%) | Unknown country | Unknown country |
| 90804d86d6c-279b-4ee5-9abc-1748b513986e | Not Translated (0%) | Osh Remark: | Osh Remark: |
| 9092ca2b9d1-4a56-40a8-aa2f-2511e806e833 | Not Translated (0%) | Kyrgyz SSR | Kyrgyz SSR |
| 910e87a6795-40a4-482a-bf57-8e5dd43a6bf0 | Not Translated (0%) | Key differences in EU sanctions and US sanctions include: | Key differences in EU sanctions and US sanctions include: |
| 911ebdcf5c7-49e1-4177-8994-dd3bd8680477 | Not Translated (0%) | EU sanctions must be reviewed and renewed at periods no longer than a year, and can even be as short as three months; most US sanctions are open-ended and remain in force until a decision is made to lift them. | EU sanctions must be reviewed and renewed at periods no longer than a year, and can even be as short as three months; most US sanctions are open-ended and remain in force until a decision is made to lift them. |
| 912ebdcf5c7-49e1-4177-8994-dd3bd8680477 | Not Translated (0%) | This may result in the EU being quicker to respond to positive developments. | This may result in the EU being quicker to respond to positive developments. |
| 913ebdcf5c7-49e1-4177-8994-dd3bd8680477 | Not Translated (0%) | One example occurred when the US eased some restrictions on Myanmar/Burma in December 2016. | One example occurred when the US eased some restrictions on Myanmar/Burma in December 2016. |
| 914ebdcf5c7-49e1-4177-8994-dd3bd8680477 | Not Translated (0%) | Four years earlier, the EU had already lifted all of its sanctions other than an arms embargo. | Four years earlier, the EU had already lifted all of its sanctions other than an arms embargo. |
| 9150119cb60-c239-4acb-8bf3-4dc9a8a1f315 | Not Translated (0%) | Martin Russell, “EU sanctions: | Martin Russell, “EU sanctions: |
| 9160119cb60-c239-4acb-8bf3-4dc9a8a1f315 | Not Translated (0%) | A key foreign and security policy instrument,” European Parliament briefing, European Parliamentary Research Service, May 2018. | A key foreign and security policy instrument,” European Parliament briefing, European Parliamentary Research Service, May 2018. |
| 917619252cd-bb23-4b90-9b2c-f8f234834005 | Not Translated (0%) | US sanctions are generally much broader in scope, targeting a much wider range of goods and many more persons. | US sanctions are generally much broader in scope, targeting a much wider range of goods and many more persons. |
| 91893f64615-4b40-4d64-ab2f-50b6932d6afa | Not Translated (0%) | US sanctions may be extraterritorial whereas EU sanctions prohibit extraterritoriality. | US sanctions may be extraterritorial whereas EU sanctions prohibit extraterritoriality. |
| 919e4b12b9c-5709-4934-9e7e-cc95795754a3 | Not Translated (0%) | US sanctions include those entities owned 50% or more by a sanctioned target (SDN) and aggregate beneficial ownership, but do not include entities controlled by a sanctioned target. | US sanctions include those entities owned 50% or more by a sanctioned target (SDN) and aggregate beneficial ownership, but do not include entities controlled by a sanctioned target. |
| 920e4b12b9c-5709-4934-9e7e-cc95795754a3 | Not Translated (0%) | EU sanctions include entities owned more than 50% by a sanctioned target, but also include entities controlled by a sanctioned target even if ownership is not more than 50%. | EU sanctions include entities owned more than 50% by a sanctioned target, but also include entities controlled by a sanctioned target even if ownership is not more than 50%. |
| 921b0b9ac1b-195a-4c3a-b918-a1d9e5818618 | Not Translated (0%) | OTHER COUNTRIES: | OTHER COUNTRIES: |
| 922b0b9ac1b-195a-4c3a-b918-a1d9e5818618 | Not Translated (0%) | “CONSOLIDATED LIST” | “CONSOLIDATED LIST” |
| 923d23e6a13-ca4c-4bf1-a2bd-d6c544006d88 | Not Translated (0%) | Other countries that similarly maintain their own sanctions lists will also likely maintain a “consolidated list,” or a list of all those individuals and entities that they currently sanction. | Other countries that similarly maintain their own sanctions lists will also likely maintain a “consolidated list,” or a list of all those individuals and entities that they currently sanction. |
| 924d23e6a13-ca4c-4bf1-a2bd-d6c544006d88 | Not Translated (0%) | If the country is also a Member State of the UN, then this is in addition to the UN sanctions. | If the country is also a Member State of the UN, then this is in addition to the UN sanctions. |
| 925d23e6a13-ca4c-4bf1-a2bd-d6c544006d88 | Not Translated (0%) | In the United Kingdom, Her Majesty’s (HM) Treasury maintains a consolidated list, which is published by the Office of Financial Sanctions Implementation (OFSI). | In the United Kingdom, Her Majesty’s (HM) Treasury maintains a consolidated list, which is published by the Office of Financial Sanctions Implementation (OFSI). |
| 926d23e6a13-ca4c-4bf1-a2bd-d6c544006d88 | Not Translated (0%) | The list can be found on the UK’s website. | The list can be found on the UK’s website. |
| 927d23e6a13-ca4c-4bf1-a2bd-d6c544006d88 | Not Translated (0%) | An example of an entry on the list is included in <2147/>. | An example of an entry on the list is included in <2147/>. |
| 92874182c33-f2b0-48d0-a8e5-2bf517087977 | Not Translated (0%) | UK Consolidated List | UK Consolidated List |
| 92975048111-5640-4ba1-92d0-88213b72fa55 | Not Translated (0%) | 138. | 138. |
| 93075048111-5640-4ba1-92d0-88213b72fa55 | Not Translated (0%) | Name 6: | Name 6: |
| 9316ab57d83-7142-4660-ba6c-1da0a78cb226 | Not Translated (0%) | DELLOSA 1: | DELLOSA 1: |
| 9326ab57d83-7142-4660-ba6c-1da0a78cb226 | Not Translated (0%) | REDENDO 2: | REDENDO 2: |
| 9336ab57d83-7142-4660-ba6c-1da0a78cb226 | Not Translated (0%) | GONZALES 3: n/a 4: n/a 5: n/a. | GONZALES 3: n/a 4: n/a 5: n/a. |
| 93401d57f79-0572-473e-8668-ff7d3ab5a6ca | Not Translated (0%) | DOB: | DOB: |
| 93578069ebc-99cc-499f-92a4-a5e04593be5e | Not Translated (0%) | 14/09/1962 | 14/09/1962 |
| 936d43cca4c-68bc-455c-b79f-77fcdd725bb6 | Not Translated (0%) | POB: | POB: |
| 937e68a043b-5419-4c39-8182-c2aa7a4a70b5 | Not Translated (0%) | Punta, Santa Ana, Manila, Philippines | Punta, Santa Ana, Manila, Philippines |
| 93860ba68b3-1637-447d-84d2-88522378077a | Not Translated (0%) | a.k.a: | a.k.a: |
| 939d8324313-ff60-46a9-81d9-2a2eac5e6909 | Not Translated (0%) | (1) ABUILONGO (2) ABUMUADZ (3) ALVARADO, Arnulfo (4) BERUSA, Brandon (5) DELLOSA, Habil, Ahmad | (1) ABUILONGO (2) ABUMUADZ (3) ALVARADO, Arnulfo (4) BERUSA, Brandon (5) DELLOSA, Habil, Ahmad |
| 940639e5b78-c938-4204-88a7-1044f3eb3347 | Not Translated (0%) | Nationality: | Nationality: |
| 941f84eebf2-a29f-49f6-866e-478030e12e31 | Not Translated (0%) | Filipino | Filipino |
| 942afe6e78e-a65b-43b8-98dd-37707cc4cc12 | Not Translated (0%) | Address: | Address: |
| 9439a16020c-87fc-4514-9223-275aa37e770d | Not Translated (0%) | 131, Ma. | 131, Ma. |
| 9449a16020c-87fc-4514-9223-275aa37e770d | Not Translated (0%) | Bautista, Punta, Santa Ana, Manila, Philippines. | Bautista, Punta, Santa Ana, Manila, Philippines. |
| 9452016daec-2c40-4436-ba32-8455ccabe354 | Not Translated (0%) | Other Information: | Other Information: |
| 9466094f0ed-9bc7-4181-a862-8a96e45dae14 | Not Translated (0%) | UN RefQI.D.XXX.08. | UN RefQI.D.XXX.08. |
| 9476094f0ed-9bc7-4181-a862-8a96e45dae14 | Not Translated (0%) | Also referred to as Uhlman, Danial and Troy. | Also referred to as Uhlman, Danial and Troy. |
| 9486094f0ed-9bc7-4181-a862-8a96e45dae14 | Not Translated (0%) | Member of the Rajah Solaiman Movement and linked to the Abu Sayyaf Group. | Member of the Rajah Solaiman Movement and linked to the Abu Sayyaf Group. |
| 9496094f0ed-9bc7-4181-a862-8a96e45dae14 | Not Translated (0%) | Father's name is Ferdinand Rauol Dellosa. | Father's name is Ferdinand Rauol Dellosa. |
| 9506094f0ed-9bc7-4181-a862-8a96e45dae14 | Not Translated (0%) | Mother’s name is Editha Parasido Gonzales. | Mother’s name is Editha Parasido Gonzales. |
| 9516094f0ed-9bc7-4181-a862-8a96e45dae14 | Not Translated (0%) | In detention in the Philippines as of Feb 2010. | In detention in the Philippines as of Feb 2010. |
| 95219f957f2-fa55-4208-b688-1d0fbb535756 | Not Translated (0%) | Listed on: | Listed on: |
| 953aca6dfda-a29a-49d2-b5ec-0bb47e46d8f1 | Not Translated (0%) | 10/07/2008 | 10/07/2008 |
| 9549c990486-3367-4868-99fe-d97f704f9dbd | Not Translated (0%) | Last Updated: | Last Updated: |
| 95540d2fa55-67e0-489f-bbd9-fec9d2cd622b | Not Translated (0%) | 19/02/2011 | 19/02/2011 |
| 956fcd2bd7c-8674-4fc4-bd41-3e03f30105d7 | Not Translated (0%) | Group ID: | Group ID: |
| 957ec51999a-6d0e-48d7-b14d-3190be9ff77f | Not Translated (0%) | 1066. | 1066. |
| 958ee50a59c-6b14-4ced-9b47-dcced942bef6 | Not Translated (0%) | Additionally, an example from AUSTRAC’s list is shown in <2263/>. | Additionally, an example from AUSTRAC’s list is shown in <2263/>. |
| 9594868ecac-dc53-4627-8f99-071c0a8a59dd | Not Translated (0%) | AUSTRAC List | AUSTRAC List |
| 960d371aa6b-cf71-4ec9-88c0-a995f4cb6033 | Not Translated (0%) | Reference | Reference |
| 961d4cd93c8-8e7f-4909-a811-f88eb7503de9 | Not Translated (0%) | 2 | 2 |
| 962bab72dcf-9ac0-4958-85d5-e5d847c8e6c5 | Not Translated (0%) | Name of Individual or Entity | Name of Individual or Entity |
| 9632c0a0d64-c8df-4789-b14c-90ecbede2757 | Not Translated (0%) | MOHAMMAD HASSEIN ABBOUD | MOHAMMAD HASSEIN ABBOUD |
| 96425b68167-530a-45e9-8680-958c33cbae2a | Not Translated (0%) | Type | Type |
| 9654d1ee196-d768-43fa-bd9f-988a468ea736 | Not Translated (0%) | Individual | Individual |
| 96633e3c6f4-9d48-4adf-b80d-ab539d08fbba | Not Translated (0%) | Name Type | Name Type |
| 9676a571be2-4aa5-4da2-a293-344bf265ce5b | Not Translated (0%) | Primary Name | Primary Name |
| 968325a7aee-22a7-4752-a3d7-f3166b8a25ef | Not Translated (0%) | Date of Birth | Date of Birth |
| 969765a6a89-b1eb-4835-88e1-9e18706933e4 | Not Translated (0%) | a) Approximately 1945–1948 b) Approximately 1945–1950 | a) Approximately 1945–1948 b) Approximately 1945–1950 |
| 9708d1106ff-7eff-4c56-abdb-0a34a37b82b8 | Not Translated (0%) | Place of Birth | Place of Birth |
| 9716c9ddf45-f94c-4c6d-8217-c7d8fa20adec | Not Translated (0%) | Pashmul village, Panjwai District, Kandahar Province, Afghanistan | Pashmul village, Panjwai District, Kandahar Province, Afghanistan |
| 972e66635a5-eaec-4c58-bcb0-89a1f47bb499 | Not Translated (0%) | Citizenship | Citizenship |
| 973d22f000d-5b97-44d2-a248-69ab7432d11c | Not Translated (0%) | Afghanistan | Afghanistan |
| 9742702a763-23ac-41b4-be40-35859c557ae5 | Not Translated (0%) | Address | Address |
| 97572558a1d-5ef0-4880-8ed9-a6b432c9d567 | Not Translated (0%) | NA | NA |
| 976d34a28c5-b12a-42ca-944c-af2708282490 | Not Translated (0%) | Additional Information | Additional Information |
| 9778ef1c832-7007-4a89-bee3-630817de3e87 | Not Translated (0%) | Title: a) Mullah b) Haji. | Title: a) Mullah b) Haji. |
| 9788ef1c832-7007-4a89-bee3-630817de3e87 | Not Translated (0%) | Designation: a) First Deputy, Council of Ministers under the Taliban regime b) Foreign Minister before Wakil Ahmad under the Taliban regime c) Governor of Kandahar under the Taliban regime d) Political Advisor of Mullah Mohammed Omar. | Designation: a) First Deputy, Council of Ministers under the Taliban regime b) Foreign Minister before Wakil Ahmad under the Taliban regime c) Governor of Kandahar under the Taliban regime d) Political Advisor of Mullah Mohammed Omar. |
| 9798ef1c832-7007-4a89-bee3-630817de3e87 | Not Translated (0%) | A close associate of Mullah Mohammed Omar (TI.O.4.01) Member of Taliban Supreme Council as at Dec. 2009. | A close associate of Mullah Mohammed Omar (TI.O.4.01) Member of Taliban Supreme Council as at Dec. 2009. |
| 9808ef1c832-7007-4a89-bee3-630817de3e87 | Not Translated (0%) | Belongs to Kakar tribe. | Belongs to Kakar tribe. |
| 9818ef1c832-7007-4a89-bee3-630817de3e87 | Not Translated (0%) | Review pursuant to Security Council Resolution 1822 (2008) was concluded on 21 Jul. 2010. | Review pursuant to Security Council Resolution 1822 (2008) was concluded on 21 Jul. 2010. |
| 982cf45186c-4263-4fa7-8332-1e589100b326 | Not Translated (0%) | Listing Information | Listing Information |
| 983e6b45666-5388-40ca-90a3-846e3b47f0d8 | Not Translated (0%) | Listed by UN 1267 Committee on 27 January 2002 (amended on 21 December | Listed by UN 1267 Committee on 27 January 2002 (amended on 21 December |
| 98432d2fa85-f9ed-4135-aab9-c7f65968a8b2 | Not Translated (0%) | 2005, 8 July 2007 and 29 Sep 2007, 29 Nov. 2011) | 2005, 8 July 2007 and 29 Sep 2007, 29 Nov. 2011) |
| 9856d2c2dad-61ce-45e6-be64-b1bfd3fd0c3d | Not Translated (0%) | Committees | Committees |
| 986663d9aa4-c998-4eec-b72f-c5ef6c83084e | Not Translated (0%) | 1989 (Taliban) | 1989 (Taliban) |
| 9871da01a2e-806e-4986-b3d6-084c1b8ec8d8 | Not Translated (0%) | Control Date | Control Date |
| 988fd12f04d-1f35-49d0-af97-dc9b2dd32442 | Not Translated (0%) | 15/12/2014 | 15/12/2014 |
| 989f108476b-0a2c-4389-aa7c-67cb76f45faf | Not Translated (0%) | Exemptions & Exceptions (Licenses) | Exemptions & Exceptions (Licenses) |
| 9907fa67c9f-9aa7-4b28-aa72-bfcc2ab00683 | Not Translated (0%) | Historically, sanctions were an all-or-nothing action taken against another country, usually in the form of an embargo. | Historically, sanctions were an all-or-nothing action taken against another country, usually in the form of an embargo. |
| 9917fa67c9f-9aa7-4b28-aa72-bfcc2ab00683 | Not Translated (0%) | Today, most sanctions regimes include a licensing program. | Today, most sanctions regimes include a licensing program. |
| 9927fa67c9f-9aa7-4b28-aa72-bfcc2ab00683 | Not Translated (0%) | A license is a written authorization issued by a sanctions regulator that permits an activity that otherwise might be prohibited or restricted under a particular sanction. | A license is a written authorization issued by a sanctions regulator that permits an activity that otherwise might be prohibited or restricted under a particular sanction. |
| 9937fa67c9f-9aa7-4b28-aa72-bfcc2ab00683 | Not Translated (0%) | The laws or regulations passed to implement financial sanctions will generally contain a licensing program that allows otherwise prohibited transactions to take place in some circumstances in the form of general licenses and specific licenses. | The laws or regulations passed to implement financial sanctions will generally contain a licensing program that allows otherwise prohibited transactions to take place in some circumstances in the form of general licenses and specific licenses. |
| 9947fa67c9f-9aa7-4b28-aa72-bfcc2ab00683 | Not Translated (0%) | General licenses and specific licenses can also be viewed in terms of exemptions and exceptions, respectively. | General licenses and specific licenses can also be viewed in terms of exemptions and exceptions, respectively. |
| 9957fa67c9f-9aa7-4b28-aa72-bfcc2ab00683 | Not Translated (0%) | A general license, or exemption, is available to all persons authorizing the performance of certain categories of transactions, and the transacting persons under these licenses do not necessarily require approval from the licensing agency beforehand. | A general license, or exemption, is available to all persons authorizing the performance of certain categories of transactions, and the transacting persons under these licenses do not necessarily require approval from the licensing agency beforehand. |
| 9967fa67c9f-9aa7-4b28-aa72-bfcc2ab00683 | Not Translated (0%) | For example, pistachios and carpets, well-known commodities from Iran, used to be under a general license given their popularity. | For example, pistachios and carpets, well-known commodities from Iran, used to be under a general license given their popularity. |
| 997f18ebff4-0072-4afa-9e62-ad62653f2628 | Not Translated (0%) | Alternatively, a person can request a specific license, or exception, from the administering agent on a case-by-case basis under certain limited situations and conditions. | Alternatively, a person can request a specific license, or exception, from the administering agent on a case-by-case basis under certain limited situations and conditions. |
| 998f18ebff4-0072-4afa-9e62-ad62653f2628 | Not Translated (0%) | These specific licenses allow for transactions that are otherwise prohibited and must be presented with the licensed transaction. | These specific licenses allow for transactions that are otherwise prohibited and must be presented with the licensed transaction. |
| 999f18ebff4-0072-4afa-9e62-ad62653f2628 | Not Translated (0%) | A request must be submitted for a specific license from OFAC. | A request must be submitted for a specific license from OFAC. |
| 1000f18ebff4-0072-4afa-9e62-ad62653f2628 | Not Translated (0%) | For straightforward transactions, it may take OFAC a few months to make a determination. | For straightforward transactions, it may take OFAC a few months to make a determination. |
| 1001f18ebff4-0072-4afa-9e62-ad62653f2628 | Not Translated (0%) | For more complex transactions, the process can last up to a year or longer. | For more complex transactions, the process can last up to a year or longer. |
| 1002d7edc84d-9fce-4ed1-b554-bfe8105e0fa5 | Not Translated (0%) | If a person is denied an OFAC license, they may appeal the decision in a US federal court. | If a person is denied an OFAC license, they may appeal the decision in a US federal court. |
| 1003d7edc84d-9fce-4ed1-b554-bfe8105e0fa5 | Not Translated (0%) | However, historically, the courts have provided substantial deference to OFAC’s decisions. | However, historically, the courts have provided substantial deference to OFAC’s decisions. |
| 1004705d331d-8c49-47cf-9db0-f625b785b314 | Not Translated (0%) | The global nature of trade and transport activities means there might be a number of different jurisdictions where a license is required. | The global nature of trade and transport activities means there might be a number of different jurisdictions where a license is required. |
| 1005705d331d-8c49-47cf-9db0-f625b785b314 | Not Translated (0%) | The documentation needed for these activities can also be quite complex. | The documentation needed for these activities can also be quite complex. |
| 1006fe3e897e-aa92-414b-984c-00f114165584 | Not Translated (0%) | The overall objective of the licensing system is to strike an appropriate balance between: | The overall objective of the licensing system is to strike an appropriate balance between: |
| 1007006785cc-f528-4d7f-91f9-ab1389a57091 | Not Translated (0%) | Minimizing the risk of assets being used by a sanction’s target to engage in restricted activities, and | Minimizing the risk of assets being used by a sanction’s target to engage in restricted activities, and |
| 1008b90226c6-46fa-4e8f-95c9-1a2eabdd194e | Not Translated (0%) | Meeting the human rights or basic needs of a target while avoiding unintended economic consequences for unrelated industries and parties. | Meeting the human rights or basic needs of a target while avoiding unintended economic consequences for unrelated industries and parties. |
| 1009e262b236-a7ce-4746-8844-cf9b937565ad | Not Translated (0%) | Those exemptions can be based on purpose or class of person, or achieved through a licensing regime. | Those exemptions can be based on purpose or class of person, or achieved through a licensing regime. |
| 1010e262b236-a7ce-4746-8844-cf9b937565ad | Not Translated (0%) | Most sanctions regimes contain general licenses for acquiring legal services, including OFAC, which allows for providing legal services to sanctions targets for the following, among other things: | Most sanctions regimes contain general licenses for acquiring legal services, including OFAC, which allows for providing legal services to sanctions targets for the following, among other things: |
| 1011235d4de8-1fe3-4f6b-89f3-b93d90665a60 | Not Translated (0%) | Compliance with US and state laws so long as it is not related to the facilitation of sanctioned activity | Compliance with US and state laws so long as it is not related to the facilitation of sanctioned activity |
| 1012065cac58-9375-4bbc-b6ef-f8be43eed029 | Not Translated (0%) | Representation before an agency with respect to US sanctions | Representation before an agency with respect to US sanctions |
| 1013a49ac99b-a7f0-42d9-8231-c9d4be26284d | Not Translated (0%) | Representation where the US law requires access to legal counsel at the public’s expense, for example, in criminal proceedings | Representation where the US law requires access to legal counsel at the public’s expense, for example, in criminal proceedings |
| 1014e0936370-9759-47be-8293-96712c197b63 | Not Translated (0%) | Additionally, OFAC allows for nonscheduled emergency services to be provided for sanctions targets. | Additionally, OFAC allows for nonscheduled emergency services to be provided for sanctions targets. |
| 1015e0936370-9759-47be-8293-96712c197b63 | Not Translated (0%) | However, in many cases, the receipt of payment for the services, medical and legal, still must be specifically licensed. | However, in many cases, the receipt of payment for the services, medical and legal, still must be specifically licensed. |
| 10161d41ee3e-1f01-4e1c-87ac-de3ed91d7db4 | Not Translated (0%) | In the UK, the Export Control Joint Unit is responsible for issuing licenses to export controlled goods and goods that might be caught by a country-specific embargo. | In the UK, the Export Control Joint Unit is responsible for issuing licenses to export controlled goods and goods that might be caught by a country-specific embargo. |
| 101730e318e6-e0c1-4b8d-afe1-8ec4625c9b0c | Not Translated (0%) | Other authorities in the UK, such as OFSI, issue license applications to deal with the funds or assets of targeted individuals. | Other authorities in the UK, such as OFSI, issue license applications to deal with the funds or assets of targeted individuals. |
| 1018d29b4115-abf8-4f3c-9e8e-e083cca701ad | Not Translated (0%) | The UK has issued a small number of general licenses under two of its terrorism-related sanctions restrictions. | The UK has issued a small number of general licenses under two of its terrorism-related sanctions restrictions. |
| 1019d29b4115-abf8-4f3c-9e8e-e083cca701ad | Not Translated (0%) | These general licenses apply only in the specific circumstances set out in each license. | These general licenses apply only in the specific circumstances set out in each license. |
| 1020d29b4115-abf8-4f3c-9e8e-e083cca701ad | Not Translated (0%) | The permitted activities may include: | The permitted activities may include: |
| 10211974401f-7cb7-4d0a-b596-39d1936bbce5 | Not Translated (0%) | Issuing insurance to a sanctions target and allowing certain temporary provisions under insurance policies, such as the use of a courtesy car or temporary accommodation | Issuing insurance to a sanctions target and allowing certain temporary provisions under insurance policies, such as the use of a courtesy car or temporary accommodation |
| 102279d0999f-6457-444a-8876-a32f1aa02d6c | Not Translated (0%) | Paying solicitors who provide legal aid where advice or representation is sought by the sanctions target | Paying solicitors who provide legal aid where advice or representation is sought by the sanctions target |
| 102303e74d0f-fe96-4fb8-b6b2-d96bf67dc404 | Not Translated (0%) | Allowing a third party, such as a family member, to pay money to solicitors who may be acting for a sanctions target | Allowing a third party, such as a family member, to pay money to solicitors who may be acting for a sanctions target |
| 1024b5314b84-33ed-4e3e-a353-94d3570d5ed7 | Not Translated (0%) | The EU’s guide to best practices distinguishes between economic resources and consumptive use. | The EU’s guide to best practices distinguishes between economic resources and consumptive use. |
| 1025b5314b84-33ed-4e3e-a353-94d3570d5ed7 | Not Translated (0%) | Whereas the former are subject to sanctions, the latter are not prohibited “owing to their consumptive nature and lack of transferability.” | Whereas the former are subject to sanctions, the latter are not prohibited “owing to their consumptive nature and lack of transferability.” |
| 1026b5314b84-33ed-4e3e-a353-94d3570d5ed7 | Not Translated (0%) | These exemptions apply to domestic supplies such as gas, electricity, telephone, and other utilities because “preventing consumptive, personal use of economic resources is neither desirable nor intended.” | These exemptions apply to domestic supplies such as gas, electricity, telephone, and other utilities because “preventing consumptive, personal use of economic resources is neither desirable nor intended.” |
| 1027b5314b84-33ed-4e3e-a353-94d3570d5ed7 | Not Translated (0%) | In the case of mistaken identity, the EU also establishes as a best practice that natural persons should be able to access necessary funds for their basic needs while the investigation is ongoing. | In the case of mistaken identity, the EU also establishes as a best practice that natural persons should be able to access necessary funds for their basic needs while the investigation is ongoing. |
| 1028b5314b84-33ed-4e3e-a353-94d3570d5ed7 | Not Translated (0%) | An example would be a refugee requiring a bank account for social welfare payments. | An example would be a refugee requiring a bank account for social welfare payments. |
| 1029cca571da-788f-4abb-8b0c-b92f4db1f8b6 | Not Translated (0%) | Sanctions Types | Sanctions Types |
| 1030dc80dcef-ac27-4480-8825-b611ab9d39e5 | Not Translated (0%) | It is important to understand how to identify the various categories and types of sanctions, as the meanings of words are important to a strong governance, risk management, and compliance framework. | It is important to understand how to identify the various categories and types of sanctions, as the meanings of words are important to a strong governance, risk management, and compliance framework. |
| 10317ef95e40-60d4-4704-9735-4556ea8129ea | Not Translated (0%) | Types of Sanctions | Types of Sanctions |
| 1032b5566c39-4cf1-4fdc-8491-d9ac78971ad8 | Not Translated (0%) | Trade Sanctions | Trade Sanctions |
| 1033e94f94f2-34f8-48cb-9e1e-51977fc38c02 | Not Translated (0%) | Financial Sanctions | Financial Sanctions |
| 1034c527e0ea-726c-4a02-8bc5-b0cbb478919d | Not Translated (0%) | Comprehensive Sanctions | Comprehensive Sanctions |
| 1035739b9b06-ae7e-407e-9b60-a1f53758833a | Not Translated (0%) | Targeted Sanctions (Smart Sanctions) | Targeted Sanctions (Smart Sanctions) |
| 1036683aaf98-69fe-4ebf-b7fc-73b252243485 | Not Translated (0%) | Sectoral Sanctions | Sectoral Sanctions |
| 10374a8fc02d-b213-44c9-b8e2-a5eb236a2990 | Not Translated (0%) | Travel Bans | Travel Bans |
| 1038b2d208d3-cf80-4fba-b43d-4396530c692b | Not Translated (0%) | Economic Sanctions | Economic Sanctions |
| 103950a15386-7e41-400c-b9fb-aa32169067b6 | Not Translated (0%) | Economic sanctions can be divided into trade sanctions and financial sanctions. | Economic sanctions can be divided into trade sanctions and financial sanctions. |
| 104050a15386-7e41-400c-b9fb-aa32169067b6 | Not Translated (0%) | Economic sanctions are intended to impact targets in two primary ways: | Economic sanctions are intended to impact targets in two primary ways: |
| 1041328d8cca-167a-4548-a4cc-51b76438877a | Not Translated (0%) | Imposing trade sanctions that limit the target country’s exports or restrict its imports | Imposing trade sanctions that limit the target country’s exports or restrict its imports |
| 104297d3977a-7e74-4104-aa40-5913a660ec12 | Not Translated (0%) | Imposing financial sanctions that impede finance (including reducing aid) | Imposing financial sanctions that impede finance (including reducing aid) |
| 10434bb35cd2-b454-4fe9-9c0d-e9f86c187fb5 | Not Translated (0%) | Elliott, 2. | Elliott, 2. |
| 10445cd72157-bd59-4bfd-aba4-9bd15983c1e3 | Not Translated (0%) | TRADE SANCTIONS | TRADE SANCTIONS |
| 10456e036ff9-65e6-4771-9952-c3833c2b7562 | Not Translated (0%) | Embargoes are trade sanctions that intend to limit the targeted country’s imports and exports. | Embargoes are trade sanctions that intend to limit the targeted country’s imports and exports. |
| 10466e036ff9-65e6-4771-9952-c3833c2b7562 | Not Translated (0%) | Trade sanctions in the form of limits on a country’s exports aim at reducing its foreign sales and its foreign exchange. | Trade sanctions in the form of limits on a country’s exports aim at reducing its foreign sales and its foreign exchange. |
| 10476e036ff9-65e6-4771-9952-c3833c2b7562 | Not Translated (0%) | Trade sanctions in the form of limits on a country’s imports (or the sanctioning country’s exports to the target country) aim to deny the targeted country critical goods. | Trade sanctions in the form of limits on a country’s imports (or the sanctioning country’s exports to the target country) aim to deny the targeted country critical goods. |
| 10486e036ff9-65e6-4771-9952-c3833c2b7562 | Not Translated (0%) | When the sanctioned country exports a large percentage of total global output, the imposition of export restrictions may cause higher prices for alternative sources and for alternative goods. | When the sanctioned country exports a large percentage of total global output, the imposition of export restrictions may cause higher prices for alternative sources and for alternative goods. |
| 1049940fbc20-b23b-4227-8d83-a73d56845259 | Not Translated (0%) | Total trade embargoes are rarer because of their unintended consequences to the citizenry of a targeted country. | Total trade embargoes are rarer because of their unintended consequences to the citizenry of a targeted country. |
| 1050940fbc20-b23b-4227-8d83-a73d56845259 | Not Translated (0%) | Most trade sanctions are selective, meaning that they target, for example, energy, gas, finance, or luxury goods. | Most trade sanctions are selective, meaning that they target, for example, energy, gas, finance, or luxury goods. |
| 1051940fbc20-b23b-4227-8d83-a73d56845259 | Not Translated (0%) | Moreover, in most cases, the trade is only diverted. | Moreover, in most cases, the trade is only diverted. |
| 1052940fbc20-b23b-4227-8d83-a73d56845259 | Not Translated (0%) | Trade sanctions also rarely impact the political elite (who may also benefit from the black market), and their impact is generally diffused throughout the entire population of the country. | Trade sanctions also rarely impact the political elite (who may also benefit from the black market), and their impact is generally diffused throughout the entire population of the country. |
| 10538354cf2c-6cd3-4b2d-ac35-81bbfaa7a1a2 | Not Translated (0%) | Elliot, Hufbauer, and Oegg, 2. | Elliot, Hufbauer, and Oegg, 2. |
| 1054ba83cae8-2470-4e3e-aca2-4914c3a08548 | Not Translated (0%) | Transshipment of goods is the shipment through intermediate countries prior to the goods’ final destination. | Transshipment of goods is the shipment through intermediate countries prior to the goods’ final destination. |
| 1055ba83cae8-2470-4e3e-aca2-4914c3a08548 | Not Translated (0%) | This can become risky as these intermediate countries might be sanctioned, as in the case of shipping goods first through a port of Iran prior to landing in Afghanistan. | This can become risky as these intermediate countries might be sanctioned, as in the case of shipping goods first through a port of Iran prior to landing in Afghanistan. |
| 1056ba83cae8-2470-4e3e-aca2-4914c3a08548 | Not Translated (0%) | Sanctions regimes may also specifically prohibit transshipment of goods. | Sanctions regimes may also specifically prohibit transshipment of goods. |
| 10572632ad41-a56d-4b02-8afc-b93facec7794 | Not Translated (0%) | Understanding the geographic scope of sanctions is vital to ensuring that customer due diligence and ongoing monitoring are conducted correctly. | Understanding the geographic scope of sanctions is vital to ensuring that customer due diligence and ongoing monitoring are conducted correctly. |
| 10582632ad41-a56d-4b02-8afc-b93facec7794 | Not Translated (0%) | The wide reach of the restrictions imposed by the US and the EU means that steps must be taken to clearly understand the geographic links a customer might have in terms of their citizenship, residency, place of registration and operation, and the location of related or subsidiary entities. | The wide reach of the restrictions imposed by the US and the EU means that steps must be taken to clearly understand the geographic links a customer might have in terms of their citizenship, residency, place of registration and operation, and the location of related or subsidiary entities. |
| 1059c8fd32a6-68b5-44a0-a590-528c55cfc7d9 | Not Translated (0%) | Trade restrictions can have multiple geographic connections. | Trade restrictions can have multiple geographic connections. |
| 1060c8fd32a6-68b5-44a0-a590-528c55cfc7d9 | Not Translated (0%) | For this reason, understanding the restrictions that might apply to each of those connections is critical to ensuring that possible sanctions risks are identified before business is transacted. | For this reason, understanding the restrictions that might apply to each of those connections is critical to ensuring that possible sanctions risks are identified before business is transacted. |
| 106134a93f70-8fc5-4c18-8803-c052a598ca62 | Not Translated (0%) | Arms embargoes are a specific type of embargo that only applies to weapons and dual-use goods, which are goods that can be used for both civilian and military purposes. | Arms embargoes are a specific type of embargo that only applies to weapons and dual-use goods, which are goods that can be used for both civilian and military purposes. |
| 10627c0c5c5e-9927-43de-9cd4-39fc25c89342 | Not Translated (0%) | The Wassenaar Arrangement on Export Controls for Conventional Arms and Dual-Use Goods and Technologies, or the Wassenaar Arrangement (WA), includes 42 states that have committed to greater responsibility and transparency in the exports of weapons and dual-use goods. | The Wassenaar Arrangement on Export Controls for Conventional Arms and Dual-Use Goods and Technologies, or the Wassenaar Arrangement (WA), includes 42 states that have committed to greater responsibility and transparency in the exports of weapons and dual-use goods. |
| 10637c0c5c5e-9927-43de-9cd4-39fc25c89342 | Not Translated (0%) | The core objective of the WA is to provide information to members on those entities whose application for export licenses for providing certain goods were denied. | The core objective of the WA is to provide information to members on those entities whose application for export licenses for providing certain goods were denied. |
| 1064407ad0b8-6c6b-4898-983e-908749778f14 | Not Translated (0%) | For conventional weapons, members voluntarily report information every six months. | For conventional weapons, members voluntarily report information every six months. |
| 1065407ad0b8-6c6b-4898-983e-908749778f14 | Not Translated (0%) | For dual-use goods and other sensitive items, the WA breaks the reporting into tiers. | For dual-use goods and other sensitive items, the WA breaks the reporting into tiers. |
| 1066407ad0b8-6c6b-4898-983e-908749778f14 | Not Translated (0%) | For tier 1 items, which are “basic items,” the members agree to voluntarily provide information on those proposed export licenses that were denied to non-Wassenaar members twice per year. | For tier 1 items, which are “basic items,” the members agree to voluntarily provide information on those proposed export licenses that were denied to non-Wassenaar members twice per year. |
| 1067407ad0b8-6c6b-4898-983e-908749778f14 | Not Translated (0%) | For tier 2 items, the WA requests members to notify the Wassenaar Secretariat when an export license is denied to non-Wassenaar members on proposed transfers. | For tier 2 items, the WA requests members to notify the Wassenaar Secretariat when an export license is denied to non-Wassenaar members on proposed transfers. |
| 1068407ad0b8-6c6b-4898-983e-908749778f14 | Not Translated (0%) | Additionally, members are to report to the Wassenaar Secretariat any export license approvals of “essentially identical” transactions that another member has previously denied. | Additionally, members are to report to the Wassenaar Secretariat any export license approvals of “essentially identical” transactions that another member has previously denied. |
| 10692fd2c062-2dc2-4049-a559-1cf3fa2580bb | Not Translated (0%) | The WA assists members to control arms exports and prevent arms from being acquired by terrorist groups. | The WA assists members to control arms exports and prevent arms from being acquired by terrorist groups. |
| 1070ec9f4da3-4b29-4649-849c-7ef3774d1de8 | Not Translated (0%) | FINANCIAL SANCTIONS | FINANCIAL SANCTIONS |
| 1071031d666a-2bd5-4798-892d-e2e2488d2973 | Not Translated (0%) | Financial sanctions may come in many forms. | Financial sanctions may come in many forms. |
| 1072031d666a-2bd5-4798-892d-e2e2488d2973 | Not Translated (0%) | Governments may impose financial sanctions by prohibiting government loans and intergovernmental loans to targeted countries, or they may interrupt their commercial finance by labeling them as non-cooperative or of primary money laundering concern. | Governments may impose financial sanctions by prohibiting government loans and intergovernmental loans to targeted countries, or they may interrupt their commercial finance by labeling them as non-cooperative or of primary money laundering concern. |
| 1073031d666a-2bd5-4798-892d-e2e2488d2973 | Not Translated (0%) | This hurts the economy by causing the target country to pay higher interest rates and also by drying up their funding, as creditors avoid the additional credit risk or the risk of being sanctioned themselves. | This hurts the economy by causing the target country to pay higher interest rates and also by drying up their funding, as creditors avoid the additional credit risk or the risk of being sanctioned themselves. |
| 1074e0d5ab66-598f-4e3e-817a-3652ae6e8f06 | Not Translated (0%) | Elliot, Hufbauer, and Oegg, 2. | Elliot, Hufbauer, and Oegg, 2. |
| 107504b9d7f9-dcc7-4077-b208-384c90ad40a3 | Not Translated (0%) | Sanctions may also come in the form of asset freezing. | Sanctions may also come in the form of asset freezing. |
| 107604b9d7f9-dcc7-4077-b208-384c90ad40a3 | Not Translated (0%) | For asset freezes, the assets of a sanctioned target are required to be held or “frozen,” and the sanctioned target cannot access or use them. | For asset freezes, the assets of a sanctioned target are required to be held or “frozen,” and the sanctioned target cannot access or use them. |
| 107704b9d7f9-dcc7-4077-b208-384c90ad40a3 | Not Translated (0%) | This comes most often in the form of frozen bank accounts (or “blocked” bank accounts, as they are more commonly called in the US). | This comes most often in the form of frozen bank accounts (or “blocked” bank accounts, as they are more commonly called in the US). |
| 10787757711a-9737-450f-a3e6-6b46afb51618 | Not Translated (0%) | In contrast to trade sanctions, financial sanctions are more difficult to avoid, especially given the interconnectivity of the global payment systems. | In contrast to trade sanctions, financial sanctions are more difficult to avoid, especially given the interconnectivity of the global payment systems. |
| 10793fd996bb-2b49-48e2-bcde-854a57877572 | Not Translated (0%) | Financial sanctions are also more likely to impact the targeted individual or individuals instead of being diffused through the population. | Financial sanctions are also more likely to impact the targeted individual or individuals instead of being diffused through the population. |
| 10803fd996bb-2b49-48e2-bcde-854a57877572 | Not Translated (0%) | These sanctions take money out of the pockets of the targeted countries’ government officials and also deter funding for “pet projects.” | These sanctions take money out of the pockets of the targeted countries’ government officials and also deter funding for “pet projects.” |
| 10813fd996bb-2b49-48e2-bcde-854a57877572 | Not Translated (0%) | Financial sanctions also impact trade, as financial institutions are less likely to engage in trade finance. | Financial sanctions also impact trade, as financial institutions are less likely to engage in trade finance. |
| 10823fd996bb-2b49-48e2-bcde-854a57877572 | Not Translated (0%) | Thus trade can be impacted without trade sanctions being explicitly imposed. | Thus trade can be impacted without trade sanctions being explicitly imposed. |
| 1083a6760d4b-f7d5-48f6-9341-366a913b4d96 | Not Translated (0%) | Comprehensive Sanctions | Comprehensive Sanctions |
| 1084eabfaba7-9ad7-45d8-bd1c-192933a4b45c | Not Translated (0%) | Comprehensive sanctions aim to prevent all transactions between a sanctioning country and the sanctioned country. | Comprehensive sanctions aim to prevent all transactions between a sanctioning country and the sanctioned country. |
| 1085eabfaba7-9ad7-45d8-bd1c-192933a4b45c | Not Translated (0%) | Comprehensive sanctions nonetheless generally allow for exemptions for humanitarian and medical purposes under a general license. | Comprehensive sanctions nonetheless generally allow for exemptions for humanitarian and medical purposes under a general license. |
| 1086eabfaba7-9ad7-45d8-bd1c-192933a4b45c | Not Translated (0%) | However, outside of those exemptions, there can be no imports, exports, provision of financing, exchange or distribution of technology, or any other financial or trade activity. | However, outside of those exemptions, there can be no imports, exports, provision of financing, exchange or distribution of technology, or any other financial or trade activity. |
| 1087eabfaba7-9ad7-45d8-bd1c-192933a4b45c | Not Translated (0%) | Comprehensive sanctions would also include a full trade embargo and a cease of diplomatic relations. | Comprehensive sanctions would also include a full trade embargo and a cease of diplomatic relations. |
| 1088d67ddfec-c206-4674-a637-6eb654e18c0b | Not Translated (0%) | Different sanctions regimes have different comprehensively sanctioned countries because sanctions are a matter of foreign policy, which may create conflict. | Different sanctions regimes have different comprehensively sanctioned countries because sanctions are a matter of foreign policy, which may create conflict. |
| 1089d67ddfec-c206-4674-a637-6eb654e18c0b | Not Translated (0%) | For example, while most countries agree that North Korea should be comprehensively sanctioned, such is not the case with Cuba. | For example, while most countries agree that North Korea should be comprehensively sanctioned, such is not the case with Cuba. |
| 1090d67ddfec-c206-4674-a637-6eb654e18c0b | Not Translated (0%) | Comprehensive sanctions do not discriminate between the individuals in a country who are shaping and implementing policy and the uninvolved residents in that country. | Comprehensive sanctions do not discriminate between the individuals in a country who are shaping and implementing policy and the uninvolved residents in that country. |
| 1091d67ddfec-c206-4674-a637-6eb654e18c0b | Not Translated (0%) | As such, they can be seen as unhumanitarian. | As such, they can be seen as unhumanitarian. |
| 1092ed25be57-8923-4d52-8a2e-a53cf00bdd22 | Not Translated (0%) | An example of comprehensive sanctions resulting in a virtually total financial and trade embargo was the UN embargo on Iraq. | An example of comprehensive sanctions resulting in a virtually total financial and trade embargo was the UN embargo on Iraq. |
| 1093ed25be57-8923-4d52-8a2e-a53cf00bdd22 | Not Translated (0%) | On August 6, 1990, the UN Security Council imposed comprehensive economic sanctions on Iraq. | On August 6, 1990, the UN Security Council imposed comprehensive economic sanctions on Iraq. |
| 1094ed25be57-8923-4d52-8a2e-a53cf00bdd22 | Not Translated (0%) | This was in response to the Iraq invasion of Kuwait. | This was in response to the Iraq invasion of Kuwait. |
| 1095ed25be57-8923-4d52-8a2e-a53cf00bdd22 | Not Translated (0%) | After the US–led coalition pushed Iraq out of Kuwait, the sanctions were left in place to incentivize disarmament. | After the US–led coalition pushed Iraq out of Kuwait, the sanctions were left in place to incentivize disarmament. |
| 1096ac3a802c-98be-418f-aa35-7e0aac06307f | Not Translated (0%) | The comprehensive Iraq sanctions were harshly criticized because of their disparate impact on the innocent Iraqi civilians and unclear influence on the Iraqi leader Saddam Hussein to change his behavior. | The comprehensive Iraq sanctions were harshly criticized because of their disparate impact on the innocent Iraqi civilians and unclear influence on the Iraqi leader Saddam Hussein to change his behavior. |
| 10979cde6288-b8c9-42b9-ba91-88fc87621711 | Not Translated (0%) | Global Policy Forum, “Sanctions Against Iraq.” | Global Policy Forum, “Sanctions Against Iraq.” |
| 10981c0ba5e6-b80b-4dfc-9896-c73c0d851d0e | Not Translated (0%) | Targeted Sanctions (Smart Sanctions) | Targeted Sanctions (Smart Sanctions) |
| 1099ef3c42a4-7ff6-473a-b9d6-6e22c536fbf2 | Not Translated (0%) | In the 1990s, there was increasing concern over the impact of sanctions on civilian groups. | In the 1990s, there was increasing concern over the impact of sanctions on civilian groups. |
| 1100ef3c42a4-7ff6-473a-b9d6-6e22c536fbf2 | Not Translated (0%) | Comprehensive sanctions were seen as blunt weapons that most impacted those civilians who were already economically disadvantaged. | Comprehensive sanctions were seen as blunt weapons that most impacted those civilians who were already economically disadvantaged. |
| 1101b0d1eb58-190e-48e1-8ad5-23b51ab5049e | Not Translated (0%) | Targeted sanctions, sometimes called “smart sanctions,” allow for greater discrimination in imposing sanctions, especially considering that a particular geographic location can contain many different ethnicities, minorities, and other groups. | Targeted sanctions, sometimes called “smart sanctions,” allow for greater discrimination in imposing sanctions, especially considering that a particular geographic location can contain many different ethnicities, minorities, and other groups. |
| 1102b0d1eb58-190e-48e1-8ad5-23b51ab5049e | Not Translated (0%) | The idea is that the policy and behavior of the government is not necessarily reflective of the attitudes of the people being governed. | The idea is that the policy and behavior of the government is not necessarily reflective of the attitudes of the people being governed. |
| 1103b0d1eb58-190e-48e1-8ad5-23b51ab5049e | Not Translated (0%) | Targeted sanctions also reject the philosophy that causing civilian pain and unrest leads to political change, or hold that if it does, such a trade-off is not acceptable. | Targeted sanctions also reject the philosophy that causing civilian pain and unrest leads to political change, or hold that if it does, such a trade-off is not acceptable. |
| 1104c6ced3ac-2660-49c4-bc4d-3e49391a0959 | Not Translated (0%) | Sectoral Sanctions | Sectoral Sanctions |
| 1105d4127464-5a71-4501-a2f5-ebc3e2c00d5f | Not Translated (0%) | Since 2014, sectoral sanctions have been a new type of sanction, though they have raised compliance questions since their advent. | Since 2014, sectoral sanctions have been a new type of sanction, though they have raised compliance questions since their advent. |
| 1106fef834df-7664-4805-b316-e6cf5c504b5b | Not Translated (0%) | American Trade and Manufacturing Blog, “Russian Sectoral Sanctions in a Nutshell,” October 1, 2014 | American Trade and Manufacturing Blog, “Russian Sectoral Sanctions in a Nutshell,” October 1, 2014 |
| 11078d42a7e1-4f40-455c-bee1-42a01388ff20 | Not Translated (0%) | (Sectoral means “in a certain part or area.”) | (Sectoral means “in a certain part or area.”) |
| 11088d42a7e1-4f40-455c-bee1-42a01388ff20 | Not Translated (0%) | The corresponding list is called SSI: | The corresponding list is called SSI: |
| 11098d42a7e1-4f40-455c-bee1-42a01388ff20 | Not Translated (0%) | Sectoral Sanctions Identification, which is published by OFAC. | Sectoral Sanctions Identification, which is published by OFAC. |
| 11108d42a7e1-4f40-455c-bee1-42a01388ff20 | Not Translated (0%) | This type of sanction is even narrower than targeted sanctions. | This type of sanction is even narrower than targeted sanctions. |
| 11118d42a7e1-4f40-455c-bee1-42a01388ff20 | Not Translated (0%) | Sectoral sanctions target key entities as well as sectors of a country’s economy. | Sectoral sanctions target key entities as well as sectors of a country’s economy. |
| 11128d42a7e1-4f40-455c-bee1-42a01388ff20 | Not Translated (0%) | These sanctions are meant to be highly tailored. | These sanctions are meant to be highly tailored. |
| 11138d42a7e1-4f40-455c-bee1-42a01388ff20 | Not Translated (0%) | Sectoral sanctions prohibit certain types of transactions with certain people or entities in the targeted country within a targeted sector of the economy. | Sectoral sanctions prohibit certain types of transactions with certain people or entities in the targeted country within a targeted sector of the economy. |
| 11148d42a7e1-4f40-455c-bee1-42a01388ff20 | Not Translated (0%) | Sectoral sanctions are very dependent on facts when applied. | Sectoral sanctions are very dependent on facts when applied. |
| 111550498492-5d2e-4d90-87dc-de6099ff895f | Not Translated (0%) | Sectoral sanctions first were used against Russia when it illegally annexed Crimea and Sevastopol. | Sectoral sanctions first were used against Russia when it illegally annexed Crimea and Sevastopol. |
| 111650498492-5d2e-4d90-87dc-de6099ff895f | Not Translated (0%) | These sanctions blocked the issuance of new long-term debt and equity against state-owned Russian banks, Russian energy companies, and Russian defense companies, among others. | These sanctions blocked the issuance of new long-term debt and equity against state-owned Russian banks, Russian energy companies, and Russian defense companies, among others. |
| 1117dd7fee3e-86de-4518-9f29-601998d14705 | Not Translated (0%) | OFAC publishes this list to identify persons operating in sectors of the Russian economy identified by the secretary of the treasury pursuant to Executive Order 13662. | OFAC publishes this list to identify persons operating in sectors of the Russian economy identified by the secretary of the treasury pursuant to Executive Order 13662. |
| 1118dd7fee3e-86de-4518-9f29-601998d14705 | Not Translated (0%) | Directives found within the list describe prohibitions on dealings with the persons identified. | Directives found within the list describe prohibitions on dealings with the persons identified. |
| 1119970853db-fdee-4a95-8091-e48c87798e16 | Not Translated (0%) | The SSI list is not part of the Specially Designated Nationals (SDN) list. | The SSI list is not part of the Specially Designated Nationals (SDN) list. |
| 1120970853db-fdee-4a95-8091-e48c87798e16 | Not Translated (0%) | However, individuals and companies on the SSI list may also appear on the SDN list. | However, individuals and companies on the SSI list may also appear on the SDN list. |
| 1121970853db-fdee-4a95-8091-e48c87798e16 | Not Translated (0%) | Note that the SDN list is very broad, and the SSI Russian sectoral sanctions list is very narrow. | Note that the SDN list is very broad, and the SSI Russian sectoral sanctions list is very narrow. |
| 1122970853db-fdee-4a95-8091-e48c87798e16 | Not Translated (0%) | These are just two of the lists a business must screen its customers against. | These are just two of the lists a business must screen its customers against. |
| 112344f3e506-e270-4619-ab81-bde631c463e7 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 112444f3e506-e270-4619-ab81-bde631c463e7 | Not Translated (0%) | HAVERLY SYSTEMS, INC., 2019 | HAVERLY SYSTEMS, INC., 2019 |
| 11250271a473-3ef2-468a-90ea-da791c63ae21 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 112620ebe4ca-3da9-4b09-b5a6-47c5d06ef523 | Not Translated (0%) | Haverly Systems, Inc. (Haverly), a New Jersey corporation, entered into a settlement agreement for $75,375 with OFAC to resolve its potential liability because of two invoices issued on August 19, 2015. | Haverly Systems, Inc. (Haverly), a New Jersey corporation, entered into a settlement agreement for $75,375 with OFAC to resolve its potential liability because of two invoices issued on August 19, 2015. |
| 112720ebe4ca-3da9-4b09-b5a6-47c5d06ef523 | Not Translated (0%) | In April 2015, Haverly issued two invoices to JSC Rosneft (Rosneft) with payments due between 30 and 70 days from issuance, or between September 18, 2015, and November 09, 2015. | In April 2015, Haverly issued two invoices to JSC Rosneft (Rosneft) with payments due between 30 and 70 days from issuance, or between September 18, 2015, and November 09, 2015. |
| 112820ebe4ca-3da9-4b09-b5a6-47c5d06ef523 | Not Translated (0%) | Rosneft then notified Haverly that before it could issue payment, it required corrected tax documentation. | Rosneft then notified Haverly that before it could issue payment, it required corrected tax documentation. |
| 112920ebe4ca-3da9-4b09-b5a6-47c5d06ef523 | Not Translated (0%) | Haverly spent several months providing the corrected tax documents. | Haverly spent several months providing the corrected tax documents. |
| 113020ebe4ca-3da9-4b09-b5a6-47c5d06ef523 | Not Translated (0%) | Upon providing the documents, Rosneft remitted payment on the first invoice on May 31, 2016, which was more than nine months after the issuance of the original invoice. | Upon providing the documents, Rosneft remitted payment on the first invoice on May 31, 2016, which was more than nine months after the issuance of the original invoice. |
| 1131a25ff8d3-fb6b-4284-9f72-05a332a07e9e | Not Translated (0%) | Following the remittance of the first payment, Rosneft attempted to make the remaining payment four times between May 31, 2016, and October 27, 2016. | Following the remittance of the first payment, Rosneft attempted to make the remaining payment four times between May 31, 2016, and October 27, 2016. |
| 1132a25ff8d3-fb6b-4284-9f72-05a332a07e9e | Not Translated (0%) | All four attempts were rejected by financial institutions upon determining that the transaction was prohibited by OFAC’s prohibition of debt of greater than 90 days maturity. | All four attempts were rejected by financial institutions upon determining that the transaction was prohibited by OFAC’s prohibition of debt of greater than 90 days maturity. |
| 1133a25ff8d3-fb6b-4284-9f72-05a332a07e9e | Not Translated (0%) | During this time, Haverly received copies of SWIFT messages that indicated that their rejection was because of a connection to sectoral sanctions. | During this time, Haverly received copies of SWIFT messages that indicated that their rejection was because of a connection to sectoral sanctions. |
| 1134a25ff8d3-fb6b-4284-9f72-05a332a07e9e | Not Translated (0%) | Haverly did not have a compliance program in place and did not submit to OFAC voluntary disclosures. | Haverly did not have a compliance program in place and did not submit to OFAC voluntary disclosures. |
| 1135a25ff8d3-fb6b-4284-9f72-05a332a07e9e | Not Translated (0%) | Most likely this came to OFAC’s attention because of the involved banks filing reports to OFAC. | Most likely this came to OFAC’s attention because of the involved banks filing reports to OFAC. |
| 1136fa5869a7-1c93-4eb8-b74f-e183634930d9 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 11375ef5ec71-66c6-41c4-899f-55b2b6bc8c92 | Not Translated (0%) | A payment not processed and returned by a financial institution may be an indication of a sanctions nexus requiring investigation. | A payment not processed and returned by a financial institution may be an indication of a sanctions nexus requiring investigation. |
| 1138b88a3233-7f04-4623-b4cd-b9ff31b4960b | Not Translated (0%) | Firms should remain aware of higher-risk jurisdictions and exercise caution before transacting with them. | Firms should remain aware of higher-risk jurisdictions and exercise caution before transacting with them. |
| 11397c7bf042-072b-470a-b053-90de0135a617 | Not Translated (0%) | Financing of debt may also include invoicing for payment at a later date. | Financing of debt may also include invoicing for payment at a later date. |
| 11403d7eb9f4-99ef-4ef3-944f-8a120dca2205 | Not Translated (0%) | Travel Bans | Travel Bans |
| 1141200397b1-b670-44f7-85f3-0ffeda60c957 | Not Translated (0%) | Travel bans are sanctions that limit where an individual can travel. | Travel bans are sanctions that limit where an individual can travel. |
| 1142200397b1-b670-44f7-85f3-0ffeda60c957 | Not Translated (0%) | They often come in the form of denying visas to individuals, such as political and military leaders of the sanctioned country. | They often come in the form of denying visas to individuals, such as political and military leaders of the sanctioned country. |
| 1143200397b1-b670-44f7-85f3-0ffeda60c957 | Not Translated (0%) | These travel bans can undermine leaders’ legitimacy, illustrate moral resolve, and also cut off these individuals from accounts that they may hold overseas. | These travel bans can undermine leaders’ legitimacy, illustrate moral resolve, and also cut off these individuals from accounts that they may hold overseas. |
| 1144200397b1-b670-44f7-85f3-0ffeda60c957 | Not Translated (0%) | Travel bans are most effective when used with other types of sanctions. | Travel bans are most effective when used with other types of sanctions. |
| 1145928a513f-528b-44cc-ac2c-2bd55b12c085 | Not Translated (0%) | Consequences for Noncompliance | Consequences for Noncompliance |
| 1146519e3ebb-8c6d-4ba7-8654-f9a7bc21e4f2 | Not Translated (0%) | Noncompliance, at its core, can result in civil penalties and criminal punishments, even prison. | Noncompliance, at its core, can result in civil penalties and criminal punishments, even prison. |
| 1147519e3ebb-8c6d-4ba7-8654-f9a7bc21e4f2 | Not Translated (0%) | The UN and EU rely on members to enforce sanctions regimes. | The UN and EU rely on members to enforce sanctions regimes. |
| 1148519e3ebb-8c6d-4ba7-8654-f9a7bc21e4f2 | Not Translated (0%) | The US is best known for its enforcement of penalties and the resulting fines; however, other nations have begun issuing more severe penalties for sanctions violations. | The US is best known for its enforcement of penalties and the resulting fines; however, other nations have begun issuing more severe penalties for sanctions violations. |
| 1149c3f58917-d2c1-4844-b191-f3a238afb731 | Not Translated (0%) | Within the US, OFAC uses its enforcement guidelines as the method for determining whether additional investigation is merited, whether there should be a civil penalty, and if so, what the amount of the civil penalty should be. | Within the US, OFAC uses its enforcement guidelines as the method for determining whether additional investigation is merited, whether there should be a civil penalty, and if so, what the amount of the civil penalty should be. |
| 1150c3f58917-d2c1-4844-b191-f3a238afb731 | Not Translated (0%) | When determining whether to initiate a civil enforcement proceeding, OFAC considers factors such as “whether the violation involved willful or reckless conduct, the harm the violation caused to the sanctions program objectives, and the individual characteristics of the violator.” | When determining whether to initiate a civil enforcement proceeding, OFAC considers factors such as “whether the violation involved willful or reckless conduct, the harm the violation caused to the sanctions program objectives, and the individual characteristics of the violator.” |
| 115163855952-7b54-4976-ba2e-d4b3f8b8f414 | Not Translated (0%) | Kirkland and Ellis, “Voluntary Self-Disclosure of Sanctions Violations: | Kirkland and Ellis, “Voluntary Self-Disclosure of Sanctions Violations: |
| 115263855952-7b54-4976-ba2e-d4b3f8b8f414 | Not Translated (0%) | How It Works in the U.S. (Part 2),” January 19, 2018. | How It Works in the U.S. (Part 2),” January 19, 2018. |
| 1153e4331946-ae10-4a25-87f4-c473c1474ca1 | Not Translated (0%) | These characteristics may include whether the violator has a sanctions compliance program, how sophisticated the program is, and what, if any, remedial measures were taken to address the issue and prevent its recurrence. | These characteristics may include whether the violator has a sanctions compliance program, how sophisticated the program is, and what, if any, remedial measures were taken to address the issue and prevent its recurrence. |
| 115423696227-9a94-41d3-aee9-8eeeea6923c1 | Not Translated (0%) | Another consideration is whether the entity voluntarily self-disclosed the potential violation. | Another consideration is whether the entity voluntarily self-disclosed the potential violation. |
| 115523696227-9a94-41d3-aee9-8eeeea6923c1 | Not Translated (0%) | If a company determines that it has violated OFAC sanctions, it may file a voluntary self-disclosure, taking the position that the violation only constitutes a civil violation as opposed to a criminal violation. | If a company determines that it has violated OFAC sanctions, it may file a voluntary self-disclosure, taking the position that the violation only constitutes a civil violation as opposed to a criminal violation. |
| 115623696227-9a94-41d3-aee9-8eeeea6923c1 | Not Translated (0%) | However, a company may file a voluntary self-disclosure and OFAC may disagree with its filings or the nature of the violation (civil or criminal). | However, a company may file a voluntary self-disclosure and OFAC may disagree with its filings or the nature of the violation (civil or criminal). |
| 1157e74c0318-298c-4a17-ab8c-677728290fb1 | Not Translated (0%) | However, if the case is an egregious case, meaning that the activity was willful or reckless or the entity was aware of the conduct, this will be another factor taken into consideration. | However, if the case is an egregious case, meaning that the activity was willful or reckless or the entity was aware of the conduct, this will be another factor taken into consideration. |
| 1158ae9efab3-dcc2-494e-939e-5d7a5204f3ef | Not Translated (0%) | In response to a violation, OFAC may take no action, or may take a number of actions, including issuing a caution, imposing a civil monetary penalty, or even referring the case for criminal prosecution. | In response to a violation, OFAC may take no action, or may take a number of actions, including issuing a caution, imposing a civil monetary penalty, or even referring the case for criminal prosecution. |
| 11593b029c29-72dd-4f3a-84a4-931d11b4b3e3 | Not Translated (0%) | OFAC also has a schedule for how it administers fines based on transactions (noting there is variance based on the particular program; for example, under the Kingpin Act, the maximum penalty is $1,000,000). | OFAC also has a schedule for how it administers fines based on transactions (noting there is variance based on the particular program; for example, under the Kingpin Act, the maximum penalty is $1,000,000). |
| 11603b029c29-72dd-4f3a-84a4-931d11b4b3e3 | Not Translated (0%) | The severity (or amount) of the fine is directly correlated with the amount of transaction value. | The severity (or amount) of the fine is directly correlated with the amount of transaction value. |
| 11613b029c29-72dd-4f3a-84a4-931d11b4b3e3 | Not Translated (0%) | The higher the transaction value, the higher the fine. | The higher the transaction value, the higher the fine. |
| 11626724d49f-efe5-4470-bcf9-1b196f787d49 | Not Translated (0%) | 31 CFR 501, November 9, 2009. | 31 CFR 501, November 9, 2009. |
| 1163edf121dd-1494-4c95-945a-da9d20909345 | Not Translated (0%) | Additional considerations for mitigating the potential penalties are whether the entity cooperated with OFAC’s investigation, whether the management was involved in the violation, and whether the entity has a robust compliance program in place. | Additional considerations for mitigating the potential penalties are whether the entity cooperated with OFAC’s investigation, whether the management was involved in the violation, and whether the entity has a robust compliance program in place. |
| 116474d035d1-ab7f-4eeb-9d37-0b4fbb57aa6c | Not Translated (0%) | Consequences to the Individual | Consequences to the Individual |
| 1165bac61caa-35be-4bba-8eb6-4b09464348c2 | Not Translated (0%) | Individuals are subject to sanctions; therefore all individuals are liable to fines and penalties. | Individuals are subject to sanctions; therefore all individuals are liable to fines and penalties. |
| 1166bac61caa-35be-4bba-8eb6-4b09464348c2 | Not Translated (0%) | These fines and penalties vary from country to country. | These fines and penalties vary from country to country. |
| 1167bac61caa-35be-4bba-8eb6-4b09464348c2 | Not Translated (0%) | In the US, this may include a fine of up to $1 million and 20 years in prison. | In the US, this may include a fine of up to $1 million and 20 years in prison. |
| 1168297fb490-7861-4563-b7d2-027038f0e92c | Not Translated (0%) | In Australia, prison time can be up to 10 years and may include fines of AU$450,000 or three times the value of the transaction. | In Australia, prison time can be up to 10 years and may include fines of AU$450,000 or three times the value of the transaction. |
| 11690f4975e0-07da-43d2-9794-213f59de3711 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 11700f4975e0-07da-43d2-9794-213f59de3711 | Not Translated (0%) | BOBBY FISCHER, 1992 | BOBBY FISCHER, 1992 |
| 1171dd22d04b-30fd-4dd3-b966-93fb0c2c581a | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 1172a5f59081-0bf3-4447-8522-9efb8d2eb5a5 | Not Translated (0%) | In September 1992, Bobby Fischer, an American chess grandmaster, returned to chess after a 20-year absence. | In September 1992, Bobby Fischer, an American chess grandmaster, returned to chess after a 20-year absence. |
| 1173a5f59081-0bf3-4447-8522-9efb8d2eb5a5 | Not Translated (0%) | Fischer played a chess match against the Russian chess grandmaster Boris Spassky. | Fischer played a chess match against the Russian chess grandmaster Boris Spassky. |
| 1174a5f59081-0bf3-4447-8522-9efb8d2eb5a5 | Not Translated (0%) | The exhibition match took place in Yugoslavia, which was sanctioned in June 1992 by the US through an executive order restricting commercial transactions. | The exhibition match took place in Yugoslavia, which was sanctioned in June 1992 by the US through an executive order restricting commercial transactions. |
| 1175a5f59081-0bf3-4447-8522-9efb8d2eb5a5 | Not Translated (0%) | In December 1992, a US federal grand jury indicted Fischer for violating sanctions. | In December 1992, a US federal grand jury indicted Fischer for violating sanctions. |
| 1176a5f59081-0bf3-4447-8522-9efb8d2eb5a5 | Not Translated (0%) | Fischer, if prosecuted, faced up to 10 years in prison and a fine as high as $250,000. | Fischer, if prosecuted, faced up to 10 years in prison and a fine as high as $250,000. |
| 1177a5f59081-0bf3-4447-8522-9efb8d2eb5a5 | Not Translated (0%) | Though he won his chess match, Fischer never returned to the US. | Though he won his chess match, Fischer never returned to the US. |
| 11781a416e7f-fb31-4fcb-84bd-cc59647fd911 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 1179e29d1f37-c066-4785-98dd-cfd19dcff3b9 | Not Translated (0%) | Individuals, not just entities, are prosecuted under sanctions programs. | Individuals, not just entities, are prosecuted under sanctions programs. |
| 1180df628113-8390-414a-9d1a-1868e211d470 | Not Translated (0%) | Prosecution of individuals most likely will result in criminal penalties. | Prosecution of individuals most likely will result in criminal penalties. |
| 1181e7bab8f5-0dad-49ad-9c77-dd29d48628b9 | Not Translated (0%) | Consequences to the Organization | Consequences to the Organization |
| 11826da8a566-ccc5-468b-a964-24d84c9bd28e | Not Translated (0%) | Sanctions are generally strict liability for organizations. | Sanctions are generally strict liability for organizations. |
| 11836da8a566-ccc5-468b-a964-24d84c9bd28e | Not Translated (0%) | Strict liability means the organization is liable even if it did not intend to violate the sanctions or knowingly violate the sanctions. | Strict liability means the organization is liable even if it did not intend to violate the sanctions or knowingly violate the sanctions. |
| 11846da8a566-ccc5-468b-a964-24d84c9bd28e | Not Translated (0%) | Organizations are also liable even if they have robust sanctions compliance programs in place. | Organizations are also liable even if they have robust sanctions compliance programs in place. |
| 11856da8a566-ccc5-468b-a964-24d84c9bd28e | Not Translated (0%) | When assessing a penalty on an organization, OFAC takes into account whether the organization acted knowingly and how sophisticated the organization’s sanctions compliance program is. | When assessing a penalty on an organization, OFAC takes into account whether the organization acted knowingly and how sophisticated the organization’s sanctions compliance program is. |
| 1186d4a2e805-b771-44a7-858b-f3c68b202648 | Not Translated (0%) | Because OFAC takes into account mitigating factors, a large majority of OFAC cases result in a Closed Case (No Action) or a Cautionary or Warning Letter. | Because OFAC takes into account mitigating factors, a large majority of OFAC cases result in a Closed Case (No Action) or a Cautionary or Warning Letter. |
| 1187d4a2e805-b771-44a7-858b-f3c68b202648 | Not Translated (0%) | This is because most organizations try to comply with sanctions. | This is because most organizations try to comply with sanctions. |
| 118866a8fb88-106b-439b-abac-44deec3cef9d | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 118966a8fb88-106b-439b-abac-44deec3cef9d | Not Translated (0%) | ILLINOIS TOOL WORKS, INC., 2019 | ILLINOIS TOOL WORKS, INC., 2019 |
| 11908f7c9538-fae2-4a1d-b7d9-5bfd82328f4d | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 11911f9044b6-eda4-4996-b939-2a7e3146e93e | Not Translated (0%) | In February 2019, OFAC assessed a penalty of $5,512,564 against AppliChem GmbH (AppliChem). | In February 2019, OFAC assessed a penalty of $5,512,564 against AppliChem GmbH (AppliChem). |
| 11921f9044b6-eda4-4996-b939-2a7e3146e93e | Not Translated (0%) | AppliChem is a German-based manufacturer of chemicals and reagents. | AppliChem is a German-based manufacturer of chemicals and reagents. |
| 11931f9044b6-eda4-4996-b939-2a7e3146e93e | Not Translated (0%) | OFAC assessed the fine because of 304 transactions that occurred between May 2012 and February 2016 that violated sanctions against Cuba. | OFAC assessed the fine because of 304 transactions that occurred between May 2012 and February 2016 that violated sanctions against Cuba. |
| 11941f9044b6-eda4-4996-b939-2a7e3146e93e | Not Translated (0%) | AppliChem became subject to the US sanctions against Cuba because four months before the first transaction occurred, it was acquired by the US company Illinois Tool Works, Inc. (ITW). | AppliChem became subject to the US sanctions against Cuba because four months before the first transaction occurred, it was acquired by the US company Illinois Tool Works, Inc. (ITW). |
| 11951d6fc669-7a7a-4e90-be92-6bfd88d28d89 | Not Translated (0%) | Upon acquiring AppliChem, ITW sent AppliChem managers guidelines on ITW’s sanctions compliance, but AppliChem continued fulfilling contracts that were created prior to being acquired. | Upon acquiring AppliChem, ITW sent AppliChem managers guidelines on ITW’s sanctions compliance, but AppliChem continued fulfilling contracts that were created prior to being acquired. |
| 11961d6fc669-7a7a-4e90-be92-6bfd88d28d89 | Not Translated (0%) | Upon discovery, ITW’s legal department again instructed AppliChem that all transactions must cease. | Upon discovery, ITW’s legal department again instructed AppliChem that all transactions must cease. |
| 11971d6fc669-7a7a-4e90-be92-6bfd88d28d89 | Not Translated (0%) | ITW’s legal department also filed a voluntary self-disclosure to OFAC in January 2013. | ITW’s legal department also filed a voluntary self-disclosure to OFAC in January 2013. |
| 11981d6fc669-7a7a-4e90-be92-6bfd88d28d89 | Not Translated (0%) | In response, OFAC issued a cautionary letter in May 2015. | In response, OFAC issued a cautionary letter in May 2015. |
| 11993179649f-0bcc-45a4-b24a-e871d06f25aa | Not Translated (0%) | In January 2016, “an anonymous report was made through the ITW ethics helpline” | In January 2016, “an anonymous report was made through the ITW ethics helpline” |
| 12005b723267-5728-43d4-b6b5-246ed446a6d7 | Not Translated (0%) | US Department of the Treasury, Enforcement Information for February 14, 2019. | US Department of the Treasury, Enforcement Information for February 14, 2019. |
| 1201ea174b8a-993c-442b-a8dc-7651d0cf594b | Not Translated (0%) | about AppliChem’s continued sales to Cuba through an intermediary. | about AppliChem’s continued sales to Cuba through an intermediary. |
| 1202ea174b8a-993c-442b-a8dc-7651d0cf594b | Not Translated (0%) | ITW conducted a full investigation and discovered AppliChem’s former owners had created a scheme to continue making sales to Cuba. | ITW conducted a full investigation and discovered AppliChem’s former owners had created a scheme to continue making sales to Cuba. |
| 1203ea174b8a-993c-442b-a8dc-7651d0cf594b | Not Translated (0%) | ITW ceased employing the former owners and again made a self-disclosure to OFAC. | ITW ceased employing the former owners and again made a self-disclosure to OFAC. |
| 1204696c746c-0176-4cd6-b3a0-40a94d13fcda | Not Translated (0%) | OFAC determined that this latter self-disclosure involved violations that constituted an egregious case. | OFAC determined that this latter self-disclosure involved violations that constituted an egregious case. |
| 1205696c746c-0176-4cd6-b3a0-40a94d13fcda | Not Translated (0%) | The statutory maximum civil monetary penalty was $20,045,688, covering 304 transactions for a value of $3,433,495 in shipments. | The statutory maximum civil monetary penalty was $20,045,688, covering 304 transactions for a value of $3,433,495 in shipments. |
| 1206eb97f3ec-3686-4b68-8972-844c4017979c | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 120770eab493-8ff8-4486-a1e4-681046f02ec7 | Not Translated (0%) | Sanctions violations are strict liability but do not necessarily result in a fine. | Sanctions violations are strict liability but do not necessarily result in a fine. |
| 1208dfcc2c07-85dc-4e50-bc06-4f08925ef692 | Not Translated (0%) | Companies must be vigilant in monitoring and correcting remedial action after a violation is detected. | Companies must be vigilant in monitoring and correcting remedial action after a violation is detected. |
| 1209b22d2363-1936-4d63-9fde-a5d3699e080f | Not Translated (0%) | Civil penalties may be lessened by OFAC through cooperation in investigations and through other mitigating factors. | Civil penalties may be lessened by OFAC through cooperation in investigations and through other mitigating factors. |
| 12103503a007-3e2b-4ec4-89e2-49ff658328d0 | Not Translated (0%) | REPUTATIONAL DAMAGE | REPUTATIONAL DAMAGE |
| 1211d4420b6b-1503-4200-b54f-96a9e5c2c115 | Not Translated (0%) | Reputational damage or reputational risk is the risk of losing financial capital, market share, goodwill, or other revenue because of negative perception about a firm’s reputation. | Reputational damage or reputational risk is the risk of losing financial capital, market share, goodwill, or other revenue because of negative perception about a firm’s reputation. |
| 1212d4420b6b-1503-4200-b54f-96a9e5c2c115 | Not Translated (0%) | In August 2012, shares of the British bank Standard Chartered fell more than 23% on the London Stock Exchange after regulators accused the bank of helping Iran evade sanctions by covering up to $250 billion in transactions during a 10-year period. | In August 2012, shares of the British bank Standard Chartered fell more than 23% on the London Stock Exchange after regulators accused the bank of helping Iran evade sanctions by covering up to $250 billion in transactions during a 10-year period. |
| 1213aa3c4c4e-13bb-4460-a80f-e0a305a52e58 | Not Translated (0%) | Ben Rooney, “Standard Chartered’s stock drops on Iran allegations,” CNN Money, August 7, 2012. | Ben Rooney, “Standard Chartered’s stock drops on Iran allegations,” CNN Money, August 7, 2012. |
| 12144ae1c5d7-500f-40db-969e-ae9e750700fe | Not Translated (0%) | This reputational damage also comes with loss of business, civil penalty, and costs of remediation. | This reputational damage also comes with loss of business, civil penalty, and costs of remediation. |
| 12158ce703e9-7702-4f91-8a81-be93f0d4fd7e | Not Translated (0%) | Fines and penalties, especially when they are ongoing because a firm fails to remediate the issues, also may impact valuations and investor portfolios. | Fines and penalties, especially when they are ongoing because a firm fails to remediate the issues, also may impact valuations and investor portfolios. |
| 12167569ebea-d122-4960-beb9-adcb72853dd5 | Not Translated (0%) | FINES | FINES |
| 1217d2bde2b3-ba10-4418-b0a2-c6d3e94dd395 | Not Translated (0%) | Sanctions enforcements against corporations primarily come in the form of fines and an agreement to fix the problems that led to the fines. | Sanctions enforcements against corporations primarily come in the form of fines and an agreement to fix the problems that led to the fines. |
| 1218ca14f009-0b77-4ed7-a132-1cb91f677d51 | Not Translated (0%) | IMPRISONMENT | IMPRISONMENT |
| 12197e476b52-2c81-4582-93e8-e9c25e9fc315 | Not Translated (0%) | Violations of sanctions may also result in imprisonment. | Violations of sanctions may also result in imprisonment. |
| 12207e476b52-2c81-4582-93e8-e9c25e9fc315 | Not Translated (0%) | For this reason, strict liability only applies to civil penalties where a finding of intention to violate sanctions is not required. | For this reason, strict liability only applies to civil penalties where a finding of intention to violate sanctions is not required. |
| 12217e476b52-2c81-4582-93e8-e9c25e9fc315 | Not Translated (0%) | As a criminal penalty, imprisonment only applies to individuals (legal persons cannot be imprisoned). | As a criminal penalty, imprisonment only applies to individuals (legal persons cannot be imprisoned). |
| 12227e476b52-2c81-4582-93e8-e9c25e9fc315 | Not Translated (0%) | This does not mean an individual cannot be working for a company when he or she commits the violation. | This does not mean an individual cannot be working for a company when he or she commits the violation. |
| 1223828b5ab4-d073-4db6-8be5-bffb99d4f481 | Not Translated (0%) | Individuals who are found violating sanctions may also be extradited from one country to the sanctioning country. | Individuals who are found violating sanctions may also be extradited from one country to the sanctioning country. |
| 122477e62dcc-c10e-44e7-bfda-ee120494d9be | Not Translated (0%) | Incorporating Sanctions Compliance into Compliance Programs, Risk Assessment, and Employee Training | Incorporating Sanctions Compliance into Compliance Programs, Risk Assessment, and Employee Training |
| 1225bf845dff-94f9-4b64-ba3c-a8724af50b73 | Not Translated (0%) | To comply with regulatory expectations and manage sanctions risk, financial institutions must establish compliance programs based on a risk assessment and consistent with the methodology adopted by anti-money laundering (AML) risk-assessment and compliance programs. | To comply with regulatory expectations and manage sanctions risk, financial institutions must establish compliance programs based on a risk assessment and consistent with the methodology adopted by anti-money laundering (AML) risk-assessment and compliance programs. |
| 1226bf845dff-94f9-4b64-ba3c-a8724af50b73 | Not Translated (0%) | This includes providing appropriate employee training and ensuring the institutions remain up-to-date on all current sanctions-related topics. | This includes providing appropriate employee training and ensuring the institutions remain up-to-date on all current sanctions-related topics. |
| 1227c0fd02ed-657e-4b78-aedf-8980b54348fb | Not Translated (0%) | Management Commitment | Management Commitment |
| 122844fddbf4-8e8f-419b-85ad-5c40fab0bffe | Not Translated (0%) | On May 2, 2019, OFAC published “A Framework for OFAC Compliance Commitments” | On May 2, 2019, OFAC published “A Framework for OFAC Compliance Commitments” |
| 1229ff9e54f3-51a7-48ef-ba96-a4017592a880 | Not Translated (0%) | US Department of the Treasury, “OFAC Issues a Framework for Compliance Commitments,” May 2, 2019. | US Department of the Treasury, “OFAC Issues a Framework for Compliance Commitments,” May 2, 2019. |
| 123056936289-47c1-4dbd-ade3-896dfdc467ff | Not Translated (0%) | to provide organizations that are subject to US jurisdiction, as well as foreign entities that conduct business in or with the United States or US persons, or that use goods or services originating in the United States, with OFAC’s perspective on the essential components of a sanctions compliance program (SCP). | to provide organizations that are subject to US jurisdiction, as well as foreign entities that conduct business in or with the United States or US persons, or that use goods or services originating in the United States, with OFAC’s perspective on the essential components of a sanctions compliance program (SCP). |
| 123156936289-47c1-4dbd-ade3-896dfdc467ff | Not Translated (0%) | An SCP is a program run by a firm to comply with regulator expectations concerning sanctions compliance and to manage the firm’s sanctions risk. | An SCP is a program run by a firm to comply with regulator expectations concerning sanctions compliance and to manage the firm’s sanctions risk. |
| 123256936289-47c1-4dbd-ade3-896dfdc467ff | Not Translated (0%) | OFAC encourages organizations subject to US jurisdiction to use a risk-based approach to sanctions compliance by developing, implementing, and regularly updating SCPs. | OFAC encourages organizations subject to US jurisdiction to use a risk-based approach to sanctions compliance by developing, implementing, and regularly updating SCPs. |
| 123356936289-47c1-4dbd-ade3-896dfdc467ff | Not Translated (0%) | SCPs follow a similar methodology to that adopted by anti-money laundering compliance programs. | SCPs follow a similar methodology to that adopted by anti-money laundering compliance programs. |
| 123456936289-47c1-4dbd-ade3-896dfdc467ff | Not Translated (0%) | According to OFAC, the five essential components of an SCP are: | According to OFAC, the five essential components of an SCP are: |
| 1235ebe31111-a7a1-43b2-885b-6ae8e10dad9f | Not Translated (0%) | Management commitment | Management commitment |
| 12361cd2b8c9-d711-43a9-9987-393e050c20e5 | Not Translated (0%) | Risk assessment | Risk assessment |
| 123783219065-a1b0-4208-a36d-0929625ea06b | Not Translated (0%) | Internal controls | Internal controls |
| 12388b44d309-ce0e-4451-9e51-0ca9c5379be8 | Not Translated (0%) | Testing and auditing, and | Testing and auditing, and |
| 123918909460-2c22-4de1-b989-608fa4de58ab | Not Translated (0%) | Training | Training |
| 124092719eaa-5e52-46ab-83fd-5772c2d5c2b5 | Not Translated (0%) | The OFAC document states that: | The OFAC document states that: |
| 124192719eaa-5e52-46ab-83fd-5772c2d5c2b5 | Not Translated (0%) | “Senior Management’s commitment to, and support of, an organization’s risk-based SCP is one of the most important factors in determining its success. | “Senior Management’s commitment to, and support of, an organization’s risk-based SCP is one of the most important factors in determining its success. |
| 124292719eaa-5e52-46ab-83fd-5772c2d5c2b5 | Not Translated (0%) | This support is essential in ensuring the SCP receives adequate resources and is fully integrated into the organization’s daily operations, and also helps legitimize the program, empower its personnel, and foster a culture of compliance throughout the organization.” | This support is essential in ensuring the SCP receives adequate resources and is fully integrated into the organization’s daily operations, and also helps legitimize the program, empower its personnel, and foster a culture of compliance throughout the organization.” |
| 1243e2d4b3e6-852e-474d-aed5-023e4940f8b1 | Not Translated (0%) | Embedding a culture of compliance into the overall structure of a firm is critical to the development and ongoing administration of an effective compliance program. | Embedding a culture of compliance into the overall structure of a firm is critical to the development and ongoing administration of an effective compliance program. |
| 1244e2d4b3e6-852e-474d-aed5-023e4940f8b1 | Not Translated (0%) | Typically, the ultimate responsibility for the compliance program rests with the organization’s board of directors. | Typically, the ultimate responsibility for the compliance program rests with the organization’s board of directors. |
| 1245e2d4b3e6-852e-474d-aed5-023e4940f8b1 | Not Translated (0%) | The board and senior management staff members need to communicate the commitment to compliance by: | The board and senior management staff members need to communicate the commitment to compliance by: |
| 1246c5c43d53-480e-45d9-998b-dbc7bcf917b4 | Not Translated (0%) | Openly voicing and demonstrating their commitment to ethical values and integrity | Openly voicing and demonstrating their commitment to ethical values and integrity |
| 1247d67d4d59-db26-41fc-9651-415462034227 | Not Translated (0%) | Ensuring that their employees also embrace these values | Ensuring that their employees also embrace these values |
| 1248820a44d4-ffc8-4c07-b187-663c43d79ae6 | Not Translated (0%) | Ensuring that their commitment flows through all service areas and lines of business | Ensuring that their commitment flows through all service areas and lines of business |
| 12491b74b2c2-1409-4ef9-bc39-0fc205d6a2f5 | Not Translated (0%) | Holding responsible those parties who are accountable for compliance—both full-time employees in compliance and those employees engaged in business | Holding responsible those parties who are accountable for compliance—both full-time employees in compliance and those employees engaged in business |
| 1250ec284b0a-d640-49de-a111-a32b5a9ac00b | Not Translated (0%) | A culture of compliance is essential because firms that have strong commitments to ethical values, such as honesty and integrity, tend to stay out of trouble and attract the best talent and the most desirable clientele. | A culture of compliance is essential because firms that have strong commitments to ethical values, such as honesty and integrity, tend to stay out of trouble and attract the best talent and the most desirable clientele. |
| 12518c469ca9-1975-4ebb-a487-6ce0dc6ca4a8 | Not Translated (0%) | Although creating a culture of compliance cannot resolve all current or future issues, an effective compliance program focused on identifying and controlling risks is critical to the overall success of an institution. | Although creating a culture of compliance cannot resolve all current or future issues, an effective compliance program focused on identifying and controlling risks is critical to the overall success of an institution. |
| 12528c469ca9-1975-4ebb-a487-6ce0dc6ca4a8 | Not Translated (0%) | Associates in all business units must clearly understand and practice their commitment to strictly abiding by the rules. | Associates in all business units must clearly understand and practice their commitment to strictly abiding by the rules. |
| 12538c469ca9-1975-4ebb-a487-6ce0dc6ca4a8 | Not Translated (0%) | Because a written compliance program and training cannot account for every set of circumstances that may arise, adopting a culture of compliance is the most effective way to prevent small issues from becoming systemic problems. | Because a written compliance program and training cannot account for every set of circumstances that may arise, adopting a culture of compliance is the most effective way to prevent small issues from becoming systemic problems. |
| 12546a53ed4c-0159-475b-9c76-7784dc9383a9 | Not Translated (0%) | An adequate compliance program represents a financial investment that management can be reluctant to support. | An adequate compliance program represents a financial investment that management can be reluctant to support. |
| 12556a53ed4c-0159-475b-9c76-7784dc9383a9 | Not Translated (0%) | The compliance officer’s challenge is to convince management that the compliance program is an indispensable expense to protect the institution and avert legal problems and reputational harm. | The compliance officer’s challenge is to convince management that the compliance program is an indispensable expense to protect the institution and avert legal problems and reputational harm. |
| 12568be249d3-f751-4a6c-b725-477668be325f | Not Translated (0%) | As a result of findings by the US Financial Crimes Enforcement Network (FinCEN) of numerous financial institutions with compliance deficiencies, including involvement of boards and senior management staff members, FinCEN released an advisory in August 2014. | As a result of findings by the US Financial Crimes Enforcement Network (FinCEN) of numerous financial institutions with compliance deficiencies, including involvement of boards and senior management staff members, FinCEN released an advisory in August 2014. |
| 12578be249d3-f751-4a6c-b725-477668be325f | Not Translated (0%) | It suggested six guidelines for strengthening compliance culture in financial institutions, including: | It suggested six guidelines for strengthening compliance culture in financial institutions, including: |
| 12582a9980df-1755-4607-becf-866fac0fba1b | Not Translated (0%) | Leadership must actively support and understand compliance efforts. | Leadership must actively support and understand compliance efforts. |
| 1259088c8113-8277-490b-ad83-2f37fbb1cce6 | Not Translated (0%) | Efforts to manage and mitigate compliance deficiencies and risk must not be compromised by revenue interests. | Efforts to manage and mitigate compliance deficiencies and risk must not be compromised by revenue interests. |
| 12607731a19e-d056-46cd-8979-0b5a57e87a77 | Not Translated (0%) | Relevant information from the various departments within the organization must be shared with compliance staff to further the institution’s compliance efforts. | Relevant information from the various departments within the organization must be shared with compliance staff to further the institution’s compliance efforts. |
| 1261227badf0-a28e-492d-b085-6edc0f15aecb | Not Translated (0%) | The institution must devote adequate resources to its compliance function. | The institution must devote adequate resources to its compliance function. |
| 1262f061e47a-39e2-4c7d-87b4-30dc5362d206 | Not Translated (0%) | The compliance program must be effective. | The compliance program must be effective. |
| 1263f061e47a-39e2-4c7d-87b4-30dc5362d206 | Not Translated (0%) | One way to ensure this is by using an independent and competent party to test the program. | One way to ensure this is by using an independent and competent party to test the program. |
| 1264af433bd0-08c5-4bed-a1c9-4b5bb1abc600 | Not Translated (0%) | Leadership and staff must understand the purpose of its compliance efforts and how its suspicious transaction reporting (STR) is used. | Leadership and staff must understand the purpose of its compliance efforts and how its suspicious transaction reporting (STR) is used. |
| 126570299877-7621-4cf7-b4a0-d5315ad77de5 | Not Translated (0%) | Further emphasizing the need for a culture of compliance, the New York State Department of Financial Services (NYDFS) issued Final Rule Part 504 on June 30, 2016, requiring regulated institutions to maintain transaction monitoring and filtering programs (TMPs) that are reasonably designed to: | Further emphasizing the need for a culture of compliance, the New York State Department of Financial Services (NYDFS) issued Final Rule Part 504 on June 30, 2016, requiring regulated institutions to maintain transaction monitoring and filtering programs (TMPs) that are reasonably designed to: |
| 1266ea57f414-f67f-4a76-89ef-026530e75032 | Not Translated (0%) | Monitor transactions after their execution for compliance with the Bank Secrecy Act (BSA) and AML laws and regulations, including suspicious activity reporting requirements | Monitor transactions after their execution for compliance with the Bank Secrecy Act (BSA) and AML laws and regulations, including suspicious activity reporting requirements |
| 1267814cd184-554e-4db1-9802-3caa90b92224 | Not Translated (0%) | Monitor transactions prior to their execution to prevent unlawful transactions with targets of economic sanctions administered by OFAC | Monitor transactions prior to their execution to prevent unlawful transactions with targets of economic sanctions administered by OFAC |
| 126886c3450c-c4db-4eb1-88ec-01e7019fc205 | Not Translated (0%) | The Final Rule, which went into effect on January 1, 2017, also requires boards of directors and/or senior officer(s) of regulated institutions to make annual certifications to the NYDFS confirming that they have taken all steps necessary to comply with TMP requirements. | The Final Rule, which went into effect on January 1, 2017, also requires boards of directors and/or senior officer(s) of regulated institutions to make annual certifications to the NYDFS confirming that they have taken all steps necessary to comply with TMP requirements. |
| 1269f37ff862-1e71-44cb-8037-8548b77472c0 | Not Translated (0%) | Although the law may appear to be New York–specific, numerous foreign banks’ US operations must comply with it because they operate in New York. | Although the law may appear to be New York–specific, numerous foreign banks’ US operations must comply with it because they operate in New York. |
| 1270f37ff862-1e71-44cb-8037-8548b77472c0 | Not Translated (0%) | Specifically, the law covers banks, trust companies, private bankers, savings banks, and savings and loan associations chartered pursuant to the New York Banking Law, as well as all branches and agencies of foreign banking corporations licensed pursuant to the Banking Law to conduct banking operations in New York (as opposed to a license issued by the Office of the Comptroller of the Currency). | Specifically, the law covers banks, trust companies, private bankers, savings banks, and savings and loan associations chartered pursuant to the New York Banking Law, as well as all branches and agencies of foreign banking corporations licensed pursuant to the Banking Law to conduct banking operations in New York (as opposed to a license issued by the Office of the Comptroller of the Currency). |
| 1271f37ff862-1e71-44cb-8037-8548b77472c0 | Not Translated (0%) | Moreover, the law also applies to nonbank financial institutions (NBFIs) with a Banking Law license, such as check cashers and money transmitters. | Moreover, the law also applies to nonbank financial institutions (NBFIs) with a Banking Law license, such as check cashers and money transmitters. |
| 1272f37ff862-1e71-44cb-8037-8548b77472c0 | Not Translated (0%) | Penalties for noncompliance are consistent with those under the Banking Law. | Penalties for noncompliance are consistent with those under the Banking Law. |
| 1273e648dce8-06b5-4a10-b2aa-27d12da3cc72 | Not Translated (0%) | Filtering programs may be manual or automated, and must be reasonably designed for the purpose of interdicting transactions that are prohibited by OFAC. | Filtering programs may be manual or automated, and must be reasonably designed for the purpose of interdicting transactions that are prohibited by OFAC. |
| 1274e648dce8-06b5-4a10-b2aa-27d12da3cc72 | Not Translated (0%) | The programs should have the following attributes, to the extent applicable: | The programs should have the following attributes, to the extent applicable: |
| 1275ee122ab1-a14f-4102-ac39-1bbe9227aa1f | Not Translated (0%) | Be based on the risk assessment of the institution | Be based on the risk assessment of the institution |
| 127615243172-6bd2-4e3c-b8af-81dfc1954723 | Not Translated (0%) | Be based on technology, processes, or tools for matching names and accounts, in each case based on the institution’s particular risks, transactions, and product profiles | Be based on technology, processes, or tools for matching names and accounts, in each case based on the institution’s particular risks, transactions, and product profiles |
| 1277d0277c4c-e525-4d81-a526-45628caa2dc4 | Not Translated (0%) | Include end-to-end testing and pre- and post-implementation testing of the filtering program, including, as relevant, the following: a review of data matching, an evaluation of whether the OFAC sanctions list and threshold settings map to the risks of the institution, the logic of matching technology or tools, model validation, and data input and program output | Include end-to-end testing and pre- and post-implementation testing of the filtering program, including, as relevant, the following: a review of data matching, an evaluation of whether the OFAC sanctions list and threshold settings map to the risks of the institution, the logic of matching technology or tools, model validation, and data input and program output |
| 12784cd94820-b970-43ac-acad-716e05c675ee | Not Translated (0%) | Be subject to ongoing analysis to assess the logic and performance of the technology or tools for matching names and accounts, as well as the OFAC sanctions list and the threshold settings to see if they continue to map to the risks of the institution | Be subject to ongoing analysis to assess the logic and performance of the technology or tools for matching names and accounts, as well as the OFAC sanctions list and the threshold settings to see if they continue to map to the risks of the institution |
| 1279e6192273-d058-4b6e-9caa-019361efb133 | Not Translated (0%) | Include documentation that articulates the intent and design of the filtering program tools, processes, or technology | Include documentation that articulates the intent and design of the filtering program tools, processes, or technology |
| 128044abd6b2-d4c6-441f-8367-23f8872a4c89 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 128144abd6b2-d4c6-441f-8367-23f8872a4c89 | Not Translated (0%) | U.S. BANCORP, 2018 | U.S. BANCORP, 2018 |
| 12823275e7f1-5aaa-46f9-bcc6-0a5cb6a16e88 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 12833411129d-680a-4c1f-9a25-ebf8a98ac0e6 | Not Translated (0%) | In 2018, four United States regulators fined U.S. Bank more than $600 million for failures in its AML compliance program. | In 2018, four United States regulators fined U.S. Bank more than $600 million for failures in its AML compliance program. |
| 12843411129d-680a-4c1f-9a25-ebf8a98ac0e6 | Not Translated (0%) | According to the U.S. Attorney for the Southern District of New York, from 2009 to 2014 the bank “willfully failed to establish, implement, and maintain an adequate AML program.” | According to the U.S. Attorney for the Southern District of New York, from 2009 to 2014 the bank “willfully failed to establish, implement, and maintain an adequate AML program.” |
| 12850743905c-6ba6-4e91-acb1-adfec6bb09f6 | Not Translated (0%) | One focus of the complaint involved improperly funding the compliance team responsible for investigating potentially suspicious activity. | One focus of the complaint involved improperly funding the compliance team responsible for investigating potentially suspicious activity. |
| 12860743905c-6ba6-4e91-acb1-adfec6bb09f6 | Not Translated (0%) | Rather than sizing its compliance program to the alerts being generated, the bank restricted or froze the number of employees, and placed caps on the number of alerts that would be investigated. | Rather than sizing its compliance program to the alerts being generated, the bank restricted or froze the number of employees, and placed caps on the number of alerts that would be investigated. |
| 12870743905c-6ba6-4e91-acb1-adfec6bb09f6 | Not Translated (0%) | Although members of the AML compliance team specifically noted the lack of investigative resources as a risk, the bank did not provide the increased funding necessary to meet the identified need; and the number of investigators remained constant even as the bank’s assets, suspicious activity reports, and law enforcement inquiries increased. | Although members of the AML compliance team specifically noted the lack of investigative resources as a risk, the bank did not provide the increased funding necessary to meet the identified need; and the number of investigators remained constant even as the bank’s assets, suspicious activity reports, and law enforcement inquiries increased. |
| 1288c2780f6b-cd04-4e1e-b598-0e1ba52beb0e | Not Translated (0%) | Financial Crimes Enforcement Network, “FinCEN Penalizes U.S. Bank National Association for Violations of Anti-Money Laundering Laws,” February 15, 2018 | Financial Crimes Enforcement Network, “FinCEN Penalizes U.S. Bank National Association for Violations of Anti-Money Laundering Laws,” February 15, 2018 |
| 12894ee61ee5-ce14-439d-840c-ab293580c50e | Not Translated (0%) | In addition, testing showed that the thresholds set in the transaction monitoring system were failing to catch a high percentage of suspicious activity. | In addition, testing showed that the thresholds set in the transaction monitoring system were failing to catch a high percentage of suspicious activity. |
| 12904ee61ee5-ce14-439d-840c-ab293580c50e | Not Translated (0%) | But, instead of changing the thresholds, the bank halted the testing program. | But, instead of changing the thresholds, the bank halted the testing program. |
| 12914508a7f9-db88-45ce-8dfc-dacaa0c4ae08 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 129250d19792-48e7-4313-9ce6-255b5b98d0f7 | Not Translated (0%) | Although this is an AML and not a sanctions compliance case, the takeaways apply to sanctions programs as well. | Although this is an AML and not a sanctions compliance case, the takeaways apply to sanctions programs as well. |
| 129350d19792-48e7-4313-9ce6-255b5b98d0f7 | Not Translated (0%) | The case demonstrates that it is critical for a compliance program to have adequate resources. | The case demonstrates that it is critical for a compliance program to have adequate resources. |
| 1294a748fc8a-a381-44e3-b410-11ec253ec0ae | Not Translated (0%) | Providing sufficient resources based on an institution’s risk profile is an essential component of a management commitment to a culture of compliance. | Providing sufficient resources based on an institution’s risk profile is an essential component of a management commitment to a culture of compliance. |
| 1295f6d2bede-8690-4e09-bbe9-fe0bff0ea9ef | Not Translated (0%) | The number of employees in a compliance program cannot drive the number of transactions reviewed. | The number of employees in a compliance program cannot drive the number of transactions reviewed. |
| 1296f6d2bede-8690-4e09-bbe9-fe0bff0ea9ef | Not Translated (0%) | Rather, the number of transactions requiring review should drive the headcount. | Rather, the number of transactions requiring review should drive the headcount. |
| 12972b153c83-d329-4758-a1b9-f09ab3bf73d2 | Not Translated (0%) | The key to maximizing the compliance unit’s usefulness is to share valuable data with other areas of the firm, not simply with law enforcement agencies, regulators, and senior management. | The key to maximizing the compliance unit’s usefulness is to share valuable data with other areas of the firm, not simply with law enforcement agencies, regulators, and senior management. |
| 12982b153c83-d329-4758-a1b9-f09ab3bf73d2 | Not Translated (0%) | As compliance units build their customer due diligence (CDD) files, they can identify information that other departments can use to cross-sell products and expand profits. | As compliance units build their customer due diligence (CDD) files, they can identify information that other departments can use to cross-sell products and expand profits. |
| 12992b153c83-d329-4758-a1b9-f09ab3bf73d2 | Not Translated (0%) | For example, marketing departments that better understand the activity of certain retail or business customers can more effectively identify opportunities to market additional products and deepen the overall customer relationship. | For example, marketing departments that better understand the activity of certain retail or business customers can more effectively identify opportunities to market additional products and deepen the overall customer relationship. |
| 13002b153c83-d329-4758-a1b9-f09ab3bf73d2 | Not Translated (0%) | For example, given the TMP’s emphasis on data, firms have strengthened their controls over data governance and enhanced data quality. | For example, given the TMP’s emphasis on data, firms have strengthened their controls over data governance and enhanced data quality. |
| 13012b153c83-d329-4758-a1b9-f09ab3bf73d2 | Not Translated (0%) | This, in turn, has led to increased opportunities for providing more clear and accurate metrics to senior management on risk exposure, markets in which the firm does business, the number of specific customers, etc., allowing management to make more informed strategic decisions. | This, in turn, has led to increased opportunities for providing more clear and accurate metrics to senior management on risk exposure, markets in which the firm does business, the number of specific customers, etc., allowing management to make more informed strategic decisions. |
| 1302cccf3704-0bac-40e3-9576-1866459cec8a | Not Translated (0%) | Although improving data quality for TMP can also result in marketing benefits, it is important to review applicable privacy laws and the firm’s privacy policy before releasing customer information to ensure understanding of any limitations. | Although improving data quality for TMP can also result in marketing benefits, it is important to review applicable privacy laws and the firm’s privacy policy before releasing customer information to ensure understanding of any limitations. |
| 1303cccf3704-0bac-40e3-9576-1866459cec8a | Not Translated (0%) | There are usually no regulatory issues with sharing customer information with internal departments within the same legal entity; however, there may be limitations on sharing information with other affiliated companies within a larger organization, especially affiliates that are located in a different jurisdiction. | There are usually no regulatory issues with sharing customer information with internal departments within the same legal entity; however, there may be limitations on sharing information with other affiliated companies within a larger organization, especially affiliates that are located in a different jurisdiction. |
| 1304cccf3704-0bac-40e3-9576-1866459cec8a | Not Translated (0%) | Some firms restrict the sharing of customer information outside the organization, and customers may opt out of allowing a firm to provide their information to third-party companies. | Some firms restrict the sharing of customer information outside the organization, and customers may opt out of allowing a firm to provide their information to third-party companies. |
| 1305f5e089f1-cb04-443d-b736-007912b159b8 | Not Translated (0%) | Compliance staff should be sufficiently independent of the lines of business they support to minimize potential conflicts of interest. | Compliance staff should be sufficiently independent of the lines of business they support to minimize potential conflicts of interest. |
| 1306f5e089f1-cb04-443d-b736-007912b159b8 | Not Translated (0%) | Their compensation structures should not compromise their autonomy and their ability to exercise independent and impartial judgment. | Their compensation structures should not compromise their autonomy and their ability to exercise independent and impartial judgment. |
| 1307647102b4-4c34-4776-8d3b-9973564ac765 | Not Translated (0%) | Although the compliance staff may reside within the line of business and report to line management, they should feel comfortable escalating issues to a compliance or risk management function outside the line of business without fear of recrimination. | Although the compliance staff may reside within the line of business and report to line management, they should feel comfortable escalating issues to a compliance or risk management function outside the line of business without fear of recrimination. |
| 1308647102b4-4c34-4776-8d3b-9973564ac765 | Not Translated (0%) | A close working relationship between compliance staff and the line of business is crucial to a successful compliance program. | A close working relationship between compliance staff and the line of business is crucial to a successful compliance program. |
| 1309647102b4-4c34-4776-8d3b-9973564ac765 | Not Translated (0%) | The compliance staff members should be considered trusted advisors to whom the business-line staff can come when they have questions and need to seek advice. | The compliance staff members should be considered trusted advisors to whom the business-line staff can come when they have questions and need to seek advice. |
| 1310d0017a04-e1cd-4282-b13c-744718258f75 | Not Translated (0%) | Sanctions compliance programs should include a whistleblower policy and program. | Sanctions compliance programs should include a whistleblower policy and program. |
| 1311d0017a04-e1cd-4282-b13c-744718258f75 | Not Translated (0%) | A whistleblower is a person who exposes activity or information taking place within a firm that is illegal, unethical, or otherwise noncompliant. | A whistleblower is a person who exposes activity or information taking place within a firm that is illegal, unethical, or otherwise noncompliant. |
| 1312d0017a04-e1cd-4282-b13c-744718258f75 | Not Translated (0%) | An established whistleblower program should be a core aspect of a sanctions compliance program, providing an anonymous channel through which to escalate identified issues. | An established whistleblower program should be a core aspect of a sanctions compliance program, providing an anonymous channel through which to escalate identified issues. |
| 1313d0017a04-e1cd-4282-b13c-744718258f75 | Not Translated (0%) | It also should establish a policy of non-retaliation for the identification and exposure of issues. | It also should establish a policy of non-retaliation for the identification and exposure of issues. |
| 1314573812d9-ae92-44f7-a0f4-9e97e3f0ede1 | Not Translated (0%) | The whistleblower program should be part of the firm’s code of conduct and should be included as a regular part of training. | The whistleblower program should be part of the firm’s code of conduct and should be included as a regular part of training. |
| 1315573812d9-ae92-44f7-a0f4-9e97e3f0ede1 | Not Translated (0%) | Employees should understand how the whistleblower process works. | Employees should understand how the whistleblower process works. |
| 1316573812d9-ae92-44f7-a0f4-9e97e3f0ede1 | Not Translated (0%) | Often this takes the form of a hotline managed by an external third party and routed internally to the proper escalation channels. | Often this takes the form of a hotline managed by an external third party and routed internally to the proper escalation channels. |
| 131704e24ef8-f3e7-4290-8fa3-c6a460cbc252 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 131804e24ef8-f3e7-4290-8fa3-c6a460cbc252 | Not Translated (0%) | SWITZERLAND’S BSI BANK, 2016 | SWITZERLAND’S BSI BANK, 2016 |
| 13194504fb4e-7167-4a01-80f3-db2b43359f7e | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 132074ff8f10-77b7-4b1d-8c89-c1133309ea36 | Not Translated (0%) | On May 24, 2016, the Monetary Authority of Singapore (MAS) announced that it ordered Switzerland’s BSI Bank to shut down its operations as a merchant bank in Singapore for serious breaches of AML requirements, poor management oversight of the bank’s operations, and gross misconduct by some of the bank’s staff. | On May 24, 2016, the Monetary Authority of Singapore (MAS) announced that it ordered Switzerland’s BSI Bank to shut down its operations as a merchant bank in Singapore for serious breaches of AML requirements, poor management oversight of the bank’s operations, and gross misconduct by some of the bank’s staff. |
| 132174ff8f10-77b7-4b1d-8c89-c1133309ea36 | Not Translated (0%) | MAS also served BSI Bank notice that it would impose financial penalties amounting to SG$13.3 million for breaches of its Prevention of Money Laundering and Countering the Financing of Terrorism requirements. | MAS also served BSI Bank notice that it would impose financial penalties amounting to SG$13.3 million for breaches of its Prevention of Money Laundering and Countering the Financing of Terrorism requirements. |
| 1322bd3f6f47-90fa-4325-9660-77ebb7646843 | Not Translated (0%) | The breaches include failures to perform enhanced customer due diligence on high-risk accounts and to monitor for suspicious customer transactions on an ongoing basis. | The breaches include failures to perform enhanced customer due diligence on high-risk accounts and to monitor for suspicious customer transactions on an ongoing basis. |
| 1323bd3f6f47-90fa-4325-9660-77ebb7646843 | Not Translated (0%) | Six members of BSI Bank’s senior management and staff, including its chief executive, deputy chief executive, and wealth management head were referred to the public prosecutor for possible criminal offenses. | Six members of BSI Bank’s senior management and staff, including its chief executive, deputy chief executive, and wealth management head were referred to the public prosecutor for possible criminal offenses. |
| 1324ea863b55-7b01-4139-bf56-bf01755db438 | Not Translated (0%) | Monetary Authority of Singapore, “MAS directs BSI Bank to shut down in Singapore,” May 24, 2016. | Monetary Authority of Singapore, “MAS directs BSI Bank to shut down in Singapore,” May 24, 2016. |
| 132594ff192b-b056-47d7-a394-3afd3168c928 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 13263e7422ff-c6c7-4f8f-83b3-529a77ba3a5a | Not Translated (0%) | Senior management is liable and can be implicated in criminal proceedings when an organization is found to be in breach of compliance requirements. | Senior management is liable and can be implicated in criminal proceedings when an organization is found to be in breach of compliance requirements. |
| 1327d4e1408f-e3d5-4ac2-8c7a-0be68a95b89d | Not Translated (0%) | Effective risk assessment and customer due diligence is key to mitigating compliance risk exposure. | Effective risk assessment and customer due diligence is key to mitigating compliance risk exposure. |
| 13289acc8d11-ab5c-43b5-a673-7fcef9fc19ab | Not Translated (0%) | Transaction monitoring must be implemented in such a way that suspicious transactions do not go unnoticed. | Transaction monitoring must be implemented in such a way that suspicious transactions do not go unnoticed. |
| 132986bf6e14-c004-46a5-8ccf-5782c56eef0e | Not Translated (0%) | Regulator Expectations | Regulator Expectations |
| 133024a57b63-2cfb-4c32-9034-66bb5341e059 | Not Translated (0%) | Understanding what is legally required of your institution, employees, and customers is essential to a successful sanctions compliance program. | Understanding what is legally required of your institution, employees, and customers is essential to a successful sanctions compliance program. |
| 133124a57b63-2cfb-4c32-9034-66bb5341e059 | Not Translated (0%) | It is also important to understand the expectations of the relevant regulators and/or supervisory authorities. | It is also important to understand the expectations of the relevant regulators and/or supervisory authorities. |
| 1332372c70db-0b23-4c25-bbde-18e80c571493 | Not Translated (0%) | Financial regulators have established expectations for effective sanctions compliance programs. | Financial regulators have established expectations for effective sanctions compliance programs. |
| 1333372c70db-0b23-4c25-bbde-18e80c571493 | Not Translated (0%) | Examples of these expectations include: | Examples of these expectations include: |
| 1334926fb95b-03c4-4168-a12f-430267802d88 | Not Translated (0%) | Be demonstrably aware of international sanctions obligations. | Be demonstrably aware of international sanctions obligations. |
| 133566570fca-4add-416c-ae8d-08d72e56ff34 | Not Translated (0%) | Be compliant at all times with the applicable sanctions requirements. | Be compliant at all times with the applicable sanctions requirements. |
| 13361cfb5067-4edc-4760-a10d-40bb6228ccea | Not Translated (0%) | Focus on implementing appropriate systems and controls to mitigate sanctions risks. | Focus on implementing appropriate systems and controls to mitigate sanctions risks. |
| 133702351806-d293-48f3-b871-38bf87bffbff | Not Translated (0%) | Implement appropriate measures to ensure asset freezing and account blocking controls are applied effectively. | Implement appropriate measures to ensure asset freezing and account blocking controls are applied effectively. |
| 13381eaaceeb-393b-49bc-8a5a-8863400ed1a6 | Not Translated (0%) | Do not ignore “low-risk” areas or assume there are no sanctions risks present. | Do not ignore “low-risk” areas or assume there are no sanctions risks present. |
| 13398cd4aab1-12dc-4516-8105-94cc07247c97 | Not Translated (0%) | Do not rely on intermediaries or other financial institutions to screen customers they have referred without first verifying such screening has occurred. | Do not rely on intermediaries or other financial institutions to screen customers they have referred without first verifying such screening has occurred. |
| 13402da09a5f-53b2-43f9-92c4-dd3bebfc3e88 | Not Translated (0%) | Review outsourcing partners who assist in the management of sanctions risk, (e.g., parties who conduct screening and investigations). | Review outsourcing partners who assist in the management of sanctions risk, (e.g., parties who conduct screening and investigations). |
| 1341afc21837-d4f7-48a5-a546-bb29bfdbfc0a | Not Translated (0%) | Ensure that employee sanctions training includes “red flags.” | Ensure that employee sanctions training includes “red flags.” |
| 1342657464f9-72fc-4a79-97f6-f99bcbf164e8 | Not Translated (0%) | Periodically test sanctions controls to ensure they are fit for their purpose and not being circumvented by staff members. | Periodically test sanctions controls to ensure they are fit for their purpose and not being circumvented by staff members. |
| 13434062581f-09ed-49bf-8126-d482c2588210 | Not Translated (0%) | Regulators typically issue new rules or clarify existing rules when they observe deficiencies in sanctions compliance programs. | Regulators typically issue new rules or clarify existing rules when they observe deficiencies in sanctions compliance programs. |
| 13444062581f-09ed-49bf-8126-d482c2588210 | Not Translated (0%) | For example, in January 2017 the NYDFS issued a rule clarifying that banks must regularly test their “watch list filtering program.” | For example, in January 2017 the NYDFS issued a rule clarifying that banks must regularly test their “watch list filtering program.” |
| 13454062581f-09ed-49bf-8126-d482c2588210 | Not Translated (0%) | The notice describing this new rule outlined deficiencies the regulator had observed concerning sanctions screening, such as: | The notice describing this new rule outlined deficiencies the regulator had observed concerning sanctions screening, such as: |
| 1346d43d92b9-6607-47b7-8839-fa519ff0dd06 | Not Translated (0%) | Insufficient capacity to assess alerts | Insufficient capacity to assess alerts |
| 13470a6a544b-8b45-4cab-a9af-1bde555d4d82 | Not Translated (0%) | Filtering criteria that were too loose, generating excessive false positives | Filtering criteria that were too loose, generating excessive false positives |
| 1348a920ad69-b8ec-4a17-9049-43da63ea50cb | Not Translated (0%) | Filtering criteria that were too strict, potentially missing real hits (false negatives) | Filtering criteria that were too strict, potentially missing real hits (false negatives) |
| 13498c43b328-5ae8-44a5-8412-59fbe316a335 | Not Translated (0%) | Excluding transactions from the filtering process without first assessing risk | Excluding transactions from the filtering process without first assessing risk |
| 13509afa5e82-de9f-4e5e-b952-43506bb78ae7 | Not Translated (0%) | Watch-list filtering not carried out frequently and not clearly scheduled | Watch-list filtering not carried out frequently and not clearly scheduled |
| 1351339d0d63-00b2-4b84-bd16-b9fe8df072f4 | Not Translated (0%) | Parties on suppression lists not screened periodically or when changes were made to lists | Parties on suppression lists not screened periodically or when changes were made to lists |
| 1352eb79982b-071f-4380-894c-2c30bc19406d | Not Translated (0%) | Up-to-date sanctions lists not used in screening | Up-to-date sanctions lists not used in screening |
| 13534fe3732d-1e2e-4185-a981-cb24018131fe | Not Translated (0%) | The key regulatory expectation is that any internal lists (e.g., exclusions lists and inequalities lists) must be reviewed, corrected, and updated so that actual sanctions targets in the screening process are not missed. | The key regulatory expectation is that any internal lists (e.g., exclusions lists and inequalities lists) must be reviewed, corrected, and updated so that actual sanctions targets in the screening process are not missed. |
| 13544fe3732d-1e2e-4185-a981-cb24018131fe | Not Translated (0%) | The OFAC 2015 Guidance concerning internal lists states that these lists should be reviewed on a periodic basis when: changes are made to existing sanctions target listing information; there is an update of regulatory sanctions programs (e.g., revocation of general licenses, new programs, enhanced restrictions imposed); and changes are made to a customer’s information. | The OFAC 2015 Guidance concerning internal lists states that these lists should be reviewed on a periodic basis when: changes are made to existing sanctions target listing information; there is an update of regulatory sanctions programs (e.g., revocation of general licenses, new programs, enhanced restrictions imposed); and changes are made to a customer’s information. |
| 1355ff1f0591-3027-4a1a-8d8b-c21fc92ee7dc | Not Translated (0%) | As a best practice standard, firms should: | As a best practice standard, firms should: |
| 1356bd5efce5-bffd-4f45-ad41-20caad73d36d | Not Translated (0%) | Screen databases each time a relevant regulator (UN, EU, OFAC, etc.) introduces, updates, or renews the inclusion of targets, legislation, or regulations, and also when targets are removed from lists. | Screen databases each time a relevant regulator (UN, EU, OFAC, etc.) introduces, updates, or renews the inclusion of targets, legislation, or regulations, and also when targets are removed from lists. |
| 13578bc06175-71bb-4eba-bfdc-6d218fddf95b | Not Translated (0%) | Establish a process that screens all financial flows (incoming and outgoing funds, financial instruments, and economic resources). | Establish a process that screens all financial flows (incoming and outgoing funds, financial instruments, and economic resources). |
| 13585b04479a-5352-434f-af7e-c7d876fe17bf | Not Translated (0%) | Establish a process to ensure the effectiveness of automated screening tools (ASTs) data quality, AST settings, and frequency of screening. | Establish a process to ensure the effectiveness of automated screening tools (ASTs) data quality, AST settings, and frequency of screening. |
| 13598384a3d3-d454-44de-8753-7a0f5eb7c70b | Not Translated (0%) | Sanctions are generally strict liability, and the regulatory expectation is that transactions will be screened prior to their execution. | Sanctions are generally strict liability, and the regulatory expectation is that transactions will be screened prior to their execution. |
| 13608384a3d3-d454-44de-8753-7a0f5eb7c70b | Not Translated (0%) | This is commonly referred to as “real-time” screening or filtering (as used within DFS Part 504). | This is commonly referred to as “real-time” screening or filtering (as used within DFS Part 504). |
| 13618384a3d3-d454-44de-8753-7a0f5eb7c70b | Not Translated (0%) | Real-time screening may be manual or automated (i.e., using ASTs). | Real-time screening may be manual or automated (i.e., using ASTs). |
| 13628384a3d3-d454-44de-8753-7a0f5eb7c70b | Not Translated (0%) | Moreover, there is a regulatory expectation that financial institutions undertake batch screening. | Moreover, there is a regulatory expectation that financial institutions undertake batch screening. |
| 13638384a3d3-d454-44de-8753-7a0f5eb7c70b | Not Translated (0%) | Batch screening is a process of screening a firm’s entire customer base and other associated entities, such as vendors, with ASTs on a periodic basis. | Batch screening is a process of screening a firm’s entire customer base and other associated entities, such as vendors, with ASTs on a periodic basis. |
| 13648384a3d3-d454-44de-8753-7a0f5eb7c70b | Not Translated (0%) | Although the frequency of batch screening is generally based on an organization’s sanctions risk assessment, it is typically performed daily or when there is an update to a sanctions list. | Although the frequency of batch screening is generally based on an organization’s sanctions risk assessment, it is typically performed daily or when there is an update to a sanctions list. |
| 13658384a3d3-d454-44de-8753-7a0f5eb7c70b | Not Translated (0%) | Batch screening should also include the screening of any internal lists that an organization maintains. | Batch screening should also include the screening of any internal lists that an organization maintains. |
| 13668384a3d3-d454-44de-8753-7a0f5eb7c70b | Not Translated (0%) | The goal is to ensure that an organization is alerted as soon as possible to a change in the sanctions risks associated with one of its existing customers. | The goal is to ensure that an organization is alerted as soon as possible to a change in the sanctions risks associated with one of its existing customers. |
| 1367154845a2-9126-43ed-9169-32b2e8971d50 | Not Translated (0%) | Risk Assessment | Risk Assessment |
| 1368dd25e78c-6e16-4605-a141-6826579ef451 | Not Translated (0%) | Risk assessments are a common practice for organizations, especially financial institutions. | Risk assessments are a common practice for organizations, especially financial institutions. |
| 1369dd25e78c-6e16-4605-a141-6826579ef451 | Not Translated (0%) | A risk assessment may assess, among others, credit risk, operational risk, and compliance risk. | A risk assessment may assess, among others, credit risk, operational risk, and compliance risk. |
| 1370dd25e78c-6e16-4605-a141-6826579ef451 | Not Translated (0%) | In assessing compliance risk, one risk assessment that should be conducted is sanctions risk. | In assessing compliance risk, one risk assessment that should be conducted is sanctions risk. |
| 1371dd25e78c-6e16-4605-a141-6826579ef451 | Not Translated (0%) | A sanctions risk assessment is the foundation of a sound sanctions compliance program. | A sanctions risk assessment is the foundation of a sound sanctions compliance program. |
| 1372dd25e78c-6e16-4605-a141-6826579ef451 | Not Translated (0%) | However, within a sanctions compliance program, financial institutions cannot avoid all risk when it comes to doing business. | However, within a sanctions compliance program, financial institutions cannot avoid all risk when it comes to doing business. |
| 1373dd25e78c-6e16-4605-a141-6826579ef451 | Not Translated (0%) | So it is important that they take a risk-based approach. | So it is important that they take a risk-based approach. |
| 1374dd25e78c-6e16-4605-a141-6826579ef451 | Not Translated (0%) | A risk assessment is an important tool that allows a business to identify and assess the extent to which it may be exposed to risk. | A risk assessment is an important tool that allows a business to identify and assess the extent to which it may be exposed to risk. |
| 1375dd25e78c-6e16-4605-a141-6826579ef451 | Not Translated (0%) | In global banking, risk assessments form the foundation of a sound sanctions compliance program. | In global banking, risk assessments form the foundation of a sound sanctions compliance program. |
| 1376dd25e78c-6e16-4605-a141-6826579ef451 | Not Translated (0%) | A well-planned and well-formulated risk assessment allows a business to understand its risk profile and then determine its risk appetite for undertaking business in situations in which there could be an elevated sanctions risk. | A well-planned and well-formulated risk assessment allows a business to understand its risk profile and then determine its risk appetite for undertaking business in situations in which there could be an elevated sanctions risk. |
| 1377fa0b7c97-1dd5-40e4-8805-010b1ffc2031 | Not Translated (0%) | According to the Wolfsberg Group, an association of 13 global banks that develops frameworks and guidance for managing financial crime risks, the key purpose of a risk assessment is to drive improvements in financial crime risk management through identifying: | According to the Wolfsberg Group, an association of 13 global banks that develops frameworks and guidance for managing financial crime risks, the key purpose of a risk assessment is to drive improvements in financial crime risk management through identifying: |
| 13784e2f8a3a-7bdd-462b-9a0e-458cf674163c | Not Translated (0%) | The general and specific sanctions risks a financial institution is facing | The general and specific sanctions risks a financial institution is facing |
| 1379e6032cd1-2c35-452d-8fa3-9d1655842ba2 | Not Translated (0%) | The ways in which these risks are mitigated by a firm’s sanctions compliance program controls | The ways in which these risks are mitigated by a firm’s sanctions compliance program controls |
| 1380f4e75c78-9b43-4512-92d5-7ee3ab554c8b | Not Translated (0%) | Any additional controls to mitigate the residual risk that remains for the institution | Any additional controls to mitigate the residual risk that remains for the institution |
| 138132d4a970-7d51-430b-99f8-d788bfc1aa47 | Not Translated (0%) | The sanctions risk assessment should be conducted regularly (generally every 12 to 18 months) to ensure that sanctions risks are effectively identified and appropriately mitigated. | The sanctions risk assessment should be conducted regularly (generally every 12 to 18 months) to ensure that sanctions risks are effectively identified and appropriately mitigated. |
| 138232d4a970-7d51-430b-99f8-d788bfc1aa47 | Not Translated (0%) | Some regulators require an institution to conduct a sanctions risk assessment when they issue a consent order related to sanctions compliance failings. | Some regulators require an institution to conduct a sanctions risk assessment when they issue a consent order related to sanctions compliance failings. |
| 1383ea0d3781-d0fc-4f06-b524-0ea330e9c98f | Not Translated (0%) | RISK APPETITE | RISK APPETITE |
| 1384e46f32de-879f-444e-8d62-f3957c560ec1 | Not Translated (0%) | Conducting a risk assessment helps a business determine its risk appetite, or the amount of risk that a firm is willing to accept in pursuit of value or opportunity. | Conducting a risk assessment helps a business determine its risk appetite, or the amount of risk that a firm is willing to accept in pursuit of value or opportunity. |
| 1385e46f32de-879f-444e-8d62-f3957c560ec1 | Not Translated (0%) | A firm’s risk appetite reflects its risk management philosophy and comfort level for undertaking business in situations in which there could be an elevated sanctions risk. | A firm’s risk appetite reflects its risk management philosophy and comfort level for undertaking business in situations in which there could be an elevated sanctions risk. |
| 1386e46f32de-879f-444e-8d62-f3957c560ec1 | Not Translated (0%) | In turn, risk appetite influences the firm’s culture and operating style and guides resource allocation. | In turn, risk appetite influences the firm’s culture and operating style and guides resource allocation. |
| 1387e46f32de-879f-444e-8d62-f3957c560ec1 | Not Translated (0%) | An organization’s risk appetite is determined through the risk-assessment process and formalized in a Risk Appetite Statement or Framework. | An organization’s risk appetite is determined through the risk-assessment process and formalized in a Risk Appetite Statement or Framework. |
| 1388e46f32de-879f-444e-8d62-f3957c560ec1 | Not Translated (0%) | A Risk Appetite Statement is a statement of the level and type of risk that the organization is willing to take in order to meet its objectives, whereas a Risk Appetite Framework provides a structured approach to how risk is managed, measured, and controlled. | A Risk Appetite Statement is a statement of the level and type of risk that the organization is willing to take in order to meet its objectives, whereas a Risk Appetite Framework provides a structured approach to how risk is managed, measured, and controlled. |
| 13895d3fd2f6-3e9e-4eec-afda-1ad0b6dce899 | Not Translated (0%) | The Risk Management Association, A Framework for Setting Risk Appetite, 2013. | The Risk Management Association, A Framework for Setting Risk Appetite, 2013. |
| 1390834af1b5-fc3f-42a5-8825-2a00682e1f53 | Not Translated (0%) | A business should determine its risk appetite based on the resources it has to invest in controls, staffing, and measures to protect its reputation. | A business should determine its risk appetite based on the resources it has to invest in controls, staffing, and measures to protect its reputation. |
| 1391834af1b5-fc3f-42a5-8825-2a00682e1f53 | Not Translated (0%) | Firms can have an overarching risk appetite (i.e., enterprise-wide) and/or have risk appetites defined on a more granular level (i.e., by department). | Firms can have an overarching risk appetite (i.e., enterprise-wide) and/or have risk appetites defined on a more granular level (i.e., by department). |
| 1392a6d03a72-e96a-49b1-85ec-9162b86a09ab | Not Translated (0%) | Regulators frequently expect businesses to be able to explain how they decide what types of customers to accept, based on the level of sanctions risk they have determined they can manage. | Regulators frequently expect businesses to be able to explain how they decide what types of customers to accept, based on the level of sanctions risk they have determined they can manage. |
| 139300535fde-31cf-40cf-bd8c-d1f7df13b38f | Not Translated (0%) | Initially the business needs to determine what it considers to be high, medium, and low risk—for customers, products and services, countries, and delivery channels. | Initially the business needs to determine what it considers to be high, medium, and low risk—for customers, products and services, countries, and delivery channels. |
| 13948d8a3dba-efd8-40ed-b897-d740e468c7b3 | Not Translated (0%) | The board of directors, or its equivalent, often will set limits and thresholds on the percentage of high-risk customers the firm can accept without receiving additional approval from the board. | The board of directors, or its equivalent, often will set limits and thresholds on the percentage of high-risk customers the firm can accept without receiving additional approval from the board. |
| 13958d8a3dba-efd8-40ed-b897-d740e468c7b3 | Not Translated (0%) | Keep in mind that what is considered high risk for AML purposes may not necessarily be considered high risk for sanctions compliance, and vice versa. | Keep in mind that what is considered high risk for AML purposes may not necessarily be considered high risk for sanctions compliance, and vice versa. |
| 13968d8a3dba-efd8-40ed-b897-d740e468c7b3 | Not Translated (0%) | This principle also applies to low risk. | This principle also applies to low risk. |
| 13978d8a3dba-efd8-40ed-b897-d740e468c7b3 | Not Translated (0%) | One mistake some firms make is using their AML country risk ratings for their sanctions risk assessment, which can lead to inaccurate results. | One mistake some firms make is using their AML country risk ratings for their sanctions risk assessment, which can lead to inaccurate results. |
| 13989a13009b-241f-4387-a80d-ca725a25316b | Not Translated (0%) | In short, when a business determines its risk appetite, it is identifying its comfort level based on the resources it has to invest in controls, staffing, and measures to protect its reputation. | In short, when a business determines its risk appetite, it is identifying its comfort level based on the resources it has to invest in controls, staffing, and measures to protect its reputation. |
| 13999dc6391e-e33a-47bf-81d9-ccae9418d6b2 | Not Translated (0%) | RISK FORMULA: | RISK FORMULA: |
| 14009dc6391e-e33a-47bf-81d9-ccae9418d6b2 | Not Translated (0%) | INHERENT RISK, CONTROL EFFECTIVENESS, AND RESIDUAL RISK | INHERENT RISK, CONTROL EFFECTIVENESS, AND RESIDUAL RISK |
| 14015027e2e3-d307-4d60-84e2-18ce4fbdce9a | Not Translated (0%) | The risk assessment formula shown in <3202/> is a common formula that is suggested by the Wolfsberg Group. | The risk assessment formula shown in <3202/> is a common formula that is suggested by the Wolfsberg Group. |
| 14022ad8dfd9-99d6-42f6-be2e-1a73768e7532 | Not Translated (0%) | Risk Assessment Formula | Risk Assessment Formula |
| 1403ac7e9e77-473a-44e0-a019-16033ac6c55c | Not Translated (0%) | Inherent Risks | Inherent Risks |
| 1404b2f0bfa1-da5a-4240-8a21-8b902411929c | Not Translated (0%) | Inherent risk is the level of sanctions risk that exists before controls are applied to mitigate them. | Inherent risk is the level of sanctions risk that exists before controls are applied to mitigate them. |
| 1405b2f0bfa1-da5a-4240-8a21-8b902411929c | Not Translated (0%) | There are four main inherent risk categories: customers, products and services, countries, and delivery channels. | There are four main inherent risk categories: customers, products and services, countries, and delivery channels. |
| 1406b2f0bfa1-da5a-4240-8a21-8b902411929c | Not Translated (0%) | You may notice that the categories of risk are similar to those considered in AML and terrorist financing risk assessments. | You may notice that the categories of risk are similar to those considered in AML and terrorist financing risk assessments. |
| 1407b2f0bfa1-da5a-4240-8a21-8b902411929c | Not Translated (0%) | Inherent risk is often the starting point of a risk assessment and considers the likelihood and impact (severity) of noncompliance prior to considering any mitigating effects of risk management processes. | Inherent risk is often the starting point of a risk assessment and considers the likelihood and impact (severity) of noncompliance prior to considering any mitigating effects of risk management processes. |
| 1408479c5aef-abbf-4b97-bac0-9071f6c1fefe | Not Translated (0%) | illustrates the inherent risk matrix: the level of risk increases as the probability and severity increase. | illustrates the inherent risk matrix: the level of risk increases as the probability and severity increase. |
| 1409479c5aef-abbf-4b97-bac0-9071f6c1fefe | Not Translated (0%) | If there is a high probability that a violation will occur, and if the impact of the violation is high, the inherent risk is high. | If there is a high probability that a violation will occur, and if the impact of the violation is high, the inherent risk is high. |
| 1410902bf603-7fe1-4eac-bbcd-7d78d4ff38a9 | Not Translated (0%) | Inherent Risk Matrix | Inherent Risk Matrix |
| 1411ac1f6204-dcba-41dd-9bfe-b915abdea042 | Not Translated (0%) | Customers | Customers |
| 1412629535e3-c72b-4e13-8114-d091a38a90bc | Not Translated (0%) | Customer risk refers to the types of customers whose characteristics could expose your business to a lesser or greater degree to sanctions compliance risks. | Customer risk refers to the types of customers whose characteristics could expose your business to a lesser or greater degree to sanctions compliance risks. |
| 1413629535e3-c72b-4e13-8114-d091a38a90bc | Not Translated (0%) | The key element is the extent to which the identity of a customer—and in the case of a legal entity such as a company, its beneficial owners and controllers—can be confirmed. | The key element is the extent to which the identity of a customer—and in the case of a legal entity such as a company, its beneficial owners and controllers—can be confirmed. |
| 1414629535e3-c72b-4e13-8114-d091a38a90bc | Not Translated (0%) | This aspect of inherent risk also includes the ease with which the financial institution can identify the nature of a customer’s business, the goods and services it provides, and the jurisdictions in which it undertakes that business. | This aspect of inherent risk also includes the ease with which the financial institution can identify the nature of a customer’s business, the goods and services it provides, and the jurisdictions in which it undertakes that business. |
| 1415629535e3-c72b-4e13-8114-d091a38a90bc | Not Translated (0%) | Sanctions evasion can be facilitated when customers conceal their identity or activities, use complex legal entities with a number of different companies, and use shell companies or bearer shares. | Sanctions evasion can be facilitated when customers conceal their identity or activities, use complex legal entities with a number of different companies, and use shell companies or bearer shares. |
| 1416629535e3-c72b-4e13-8114-d091a38a90bc | Not Translated (0%) | These characteristics can increase the inherent sanctions risks to the business. | These characteristics can increase the inherent sanctions risks to the business. |
| 141750f60fcf-6968-4b6a-a4ed-b3edde6522e0 | Not Translated (0%) | Products and Services | Products and Services |
| 1418d923a692-1e6e-4b48-b0d5-3450eecedc84 | Not Translated (0%) | Products and services refers to the extent to which a bank’s product or service could be used by the customer in a way that exposes the bank to a lesser or greater degree of sanctions compliance risks. | Products and services refers to the extent to which a bank’s product or service could be used by the customer in a way that exposes the bank to a lesser or greater degree of sanctions compliance risks. |
| 1419d923a692-1e6e-4b48-b0d5-3450eecedc84 | Not Translated (0%) | The inherent risks of products and services in relation to sanctions generally increase with international and cross-border features, such as foreign correspondent banking, as opposed to domestic correspondent banking. | The inherent risks of products and services in relation to sanctions generally increase with international and cross-border features, such as foreign correspondent banking, as opposed to domestic correspondent banking. |
| 1420b24d8cc5-9687-4691-8f42-fe7d6f9686ae | Not Translated (0%) | Products and services risk typically arises when a customer misuses a product to evade sanctions, for example with international funds transfers, letters of credit, correspondent banking accounts, and—in particular—payable-through accounts. | Products and services risk typically arises when a customer misuses a product to evade sanctions, for example with international funds transfers, letters of credit, correspondent banking accounts, and—in particular—payable-through accounts. |
| 14214fb1ac83-b1ab-42c9-8052-aa8ccee64c30 | Not Translated (0%) | The level of products and services risk can be elevated when product ownership is transferred without the knowledge of the financial institution. | The level of products and services risk can be elevated when product ownership is transferred without the knowledge of the financial institution. |
| 14224fb1ac83-b1ab-42c9-8052-aa8ccee64c30 | Not Translated (0%) | For example, pre-paid cards are versatile and allow users to reload them remotely. | For example, pre-paid cards are versatile and allow users to reload them remotely. |
| 14234fb1ac83-b1ab-42c9-8052-aa8ccee64c30 | Not Translated (0%) | Users can reload them with cash and other online services without revealing their identity. | Users can reload them with cash and other online services without revealing their identity. |
| 14244fb1ac83-b1ab-42c9-8052-aa8ccee64c30 | Not Translated (0%) | In addition, these cards are very portable and can hold $10,000 or more, depending on the card. | In addition, these cards are very portable and can hold $10,000 or more, depending on the card. |
| 1425fd0b2916-65a9-4c7d-9d01-470c8d8be26c | Not Translated (0%) | Virtual currencies also pose a sanctions risk. | Virtual currencies also pose a sanctions risk. |
| 1426fd0b2916-65a9-4c7d-9d01-470c8d8be26c | Not Translated (0%) | Virtual currencies are unregulated, digital money developed by private companies and used by a defined community. | Virtual currencies are unregulated, digital money developed by private companies and used by a defined community. |
| 1427fd0b2916-65a9-4c7d-9d01-470c8d8be26c | Not Translated (0%) | Cryptocurrency is a type of virtual currency that is associated with anonymity and the encryption or lack of end-user information, such as the originator and beneficiary of a transaction. | Cryptocurrency is a type of virtual currency that is associated with anonymity and the encryption or lack of end-user information, such as the originator and beneficiary of a transaction. |
| 1428fd0b2916-65a9-4c7d-9d01-470c8d8be26c | Not Translated (0%) | These types of currency pose a challenge to sanctions regimes that are founded on knowing who is transacting. | These types of currency pose a challenge to sanctions regimes that are founded on knowing who is transacting. |
| 142906750bd1-079c-4924-b1b7-7a3f2c0a28cb | Not Translated (0%) | On March 19, 2018, OFAC announced plans to possibly include specific cryptocurrency addresses associated with blocked persons as identifiers on the Specially Designated Nationals list in an attempt to strengthen efforts against the illicit cryptocurrency transactions. | On March 19, 2018, OFAC announced plans to possibly include specific cryptocurrency addresses associated with blocked persons as identifiers on the Specially Designated Nationals list in an attempt to strengthen efforts against the illicit cryptocurrency transactions. |
| 143006750bd1-079c-4924-b1b7-7a3f2c0a28cb | Not Translated (0%) | In April 2019, researchers at the Royal United Services Institute (RUSI) showed that the exploitation of bitcoin and other cryptocurrencies for illicit activities gave a so-called “financial lifeline” to North Korea in its attempts to develop weapons of mass destruction. | In April 2019, researchers at the Royal United Services Institute (RUSI) showed that the exploitation of bitcoin and other cryptocurrencies for illicit activities gave a so-called “financial lifeline” to North Korea in its attempts to develop weapons of mass destruction. |
| 143106750bd1-079c-4924-b1b7-7a3f2c0a28cb | Not Translated (0%) | Because these currencies can be used across regions and borders, they can be attractive to those who might aim to evade financial sanctions. | Because these currencies can be used across regions and borders, they can be attractive to those who might aim to evade financial sanctions. |
| 143223902b5b-41ac-40ce-b433-3420afc4a398 | Not Translated (0%) | Anthony Cuthbertson, “North Korea Using Cryptocurrency to Fund Nuclear Weapons Development, Report Warns,” The Independent, April 22, 2019. | Anthony Cuthbertson, “North Korea Using Cryptocurrency to Fund Nuclear Weapons Development, Report Warns,” The Independent, April 22, 2019. |
| 143393a5485c-b963-417d-957b-221fd70462df | Not Translated (0%) | Internet-based products and services also can pose a higher risk because of the speed of payment processing and the anonymity provided in accessing an account. | Internet-based products and services also can pose a higher risk because of the speed of payment processing and the anonymity provided in accessing an account. |
| 143493a5485c-b963-417d-957b-221fd70462df | Not Translated (0%) | In addition, services such as trade financing (in which export and/or import activities, especially those linked to free trade zones, can involve prohibited or dual-use goods) can also increase a customer’s sanctions risk. | In addition, services such as trade financing (in which export and/or import activities, especially those linked to free trade zones, can involve prohibited or dual-use goods) can also increase a customer’s sanctions risk. |
| 143593a5485c-b963-417d-957b-221fd70462df | Not Translated (0%) | There are many dual-use goods, so it is important to check whether the product might bear a risk in this regard. | There are many dual-use goods, so it is important to check whether the product might bear a risk in this regard. |
| 143693a5485c-b963-417d-957b-221fd70462df | Not Translated (0%) | For example, a client that is engaged in the import and export of medical supplies may require financing for the export of medical equipment to a high-risk country. | For example, a client that is engaged in the import and export of medical supplies may require financing for the export of medical equipment to a high-risk country. |
| 143793a5485c-b963-417d-957b-221fd70462df | Not Translated (0%) | Although most sanctions include exemptions for medical and other humanitarian purposes, this medical equipment could contain lasers, which can be used for military purposes as well, thus turning an apparently low-risk activity into a high-risk activity. | Although most sanctions include exemptions for medical and other humanitarian purposes, this medical equipment could contain lasers, which can be used for military purposes as well, thus turning an apparently low-risk activity into a high-risk activity. |
| 1438d8f7d350-64fc-4680-bd47-049c8c4cb3d4 | Not Translated (0%) | Countries | Countries |
| 143966d4f359-5ce0-4f54-b9a0-8c95632a0486 | Not Translated (0%) | Country risk can seem complex to assess. | Country risk can seem complex to assess. |
| 144066d4f359-5ce0-4f54-b9a0-8c95632a0486 | Not Translated (0%) | For example, in the case of North Korea, the country itself is likely to be a red flag. | For example, in the case of North Korea, the country itself is likely to be a red flag. |
| 144166d4f359-5ce0-4f54-b9a0-8c95632a0486 | Not Translated (0%) | But many countries have political and/or economic relationships with sanctioned countries. | But many countries have political and/or economic relationships with sanctioned countries. |
| 144266d4f359-5ce0-4f54-b9a0-8c95632a0486 | Not Translated (0%) | Turkey, for example, although it is not highly sanctioned, is known to be an entry point for foreign fighters, money, and goods passing into Syria, and for financing terrorism. | Turkey, for example, although it is not highly sanctioned, is known to be an entry point for foreign fighters, money, and goods passing into Syria, and for financing terrorism. |
| 144366d4f359-5ce0-4f54-b9a0-8c95632a0486 | Not Translated (0%) | Japan, which also is not highly sanctioned, at one point was buying Iranian oil but does not share a border or a deep cultural relationship with Iran. | Japan, which also is not highly sanctioned, at one point was buying Iranian oil but does not share a border or a deep cultural relationship with Iran. |
| 144466d4f359-5ce0-4f54-b9a0-8c95632a0486 | Not Translated (0%) | Certain provinces of China that border North Korea are at high risk for smuggled money and goods from North Korea. | Certain provinces of China that border North Korea are at high risk for smuggled money and goods from North Korea. |
| 144566d4f359-5ce0-4f54-b9a0-8c95632a0486 | Not Translated (0%) | The United Arab Emirates is a short boat trip from Iran and a known transshipment point for goods heading to Iran. | The United Arab Emirates is a short boat trip from Iran and a known transshipment point for goods heading to Iran. |
| 144666d4f359-5ce0-4f54-b9a0-8c95632a0486 | Not Translated (0%) | Therefore, the country risk area requires careful consideration beyond whether a country is the subject of sanctions restrictions and beyond the country’s AML risk, which often is factored in as a component of sanctions risk. | Therefore, the country risk area requires careful consideration beyond whether a country is the subject of sanctions restrictions and beyond the country’s AML risk, which often is factored in as a component of sanctions risk. |
| 144766d4f359-5ce0-4f54-b9a0-8c95632a0486 | Not Translated (0%) | In the context of country risk, it is important to understand any indirect risks that could emerge as a result of further transactions into sanctioned countries, for example, while products move down the supply chain, and to assess what the risk exposure would be in this regard. | In the context of country risk, it is important to understand any indirect risks that could emerge as a result of further transactions into sanctioned countries, for example, while products move down the supply chain, and to assess what the risk exposure would be in this regard. |
| 144866d4f359-5ce0-4f54-b9a0-8c95632a0486 | Not Translated (0%) | This situation may also depend on whether an institution is providing long-term or short-term financing. | This situation may also depend on whether an institution is providing long-term or short-term financing. |
| 14498c885e11-1f4c-42f6-aff4-e9aca5a21aa4 | Not Translated (0%) | Additionally, financial institutions often serve as financial intermediaries for their customers, facilitating transactions between customers and counterparties. | Additionally, financial institutions often serve as financial intermediaries for their customers, facilitating transactions between customers and counterparties. |
| 14508c885e11-1f4c-42f6-aff4-e9aca5a21aa4 | Not Translated (0%) | The country risk component of the risk assessment should include an assessment of the country risk for those third countries in which the customers’ counterparties are located. | The country risk component of the risk assessment should include an assessment of the country risk for those third countries in which the customers’ counterparties are located. |
| 14518c885e11-1f4c-42f6-aff4-e9aca5a21aa4 | Not Translated (0%) | This element of the risk assessment is generally linked to the value and volume of transactions to any one country. | This element of the risk assessment is generally linked to the value and volume of transactions to any one country. |
| 1452012aead3-ec80-4a7e-bff1-0c5d62404a82 | Not Translated (0%) | Delivery Channels | Delivery Channels |
| 14530d8ad004-d901-4b36-9ef6-3e4827a73a6d | Not Translated (0%) | Delivery channels are the ways in which products and services are provided by a firm to its customer (also referred to as servicing methods and distribution channels). | Delivery channels are the ways in which products and services are provided by a firm to its customer (also referred to as servicing methods and distribution channels). |
| 14540d8ad004-d901-4b36-9ef6-3e4827a73a6d | Not Translated (0%) | For example, reliance upon brokers, intermediaries, and other independent third parties poses a higher sanctions risk than when a business interacts directly with customers and suppliers. | For example, reliance upon brokers, intermediaries, and other independent third parties poses a higher sanctions risk than when a business interacts directly with customers and suppliers. |
| 14550d8ad004-d901-4b36-9ef6-3e4827a73a6d | Not Translated (0%) | Similarly, if a firm relies on affiliates’ due diligence, especially if those affiliates are in jurisdictions with lower compliance standards, the absence of face-to-face onboarding presents a higher risk than when customers are onboarded directly or through a domestic affiliate. | Similarly, if a firm relies on affiliates’ due diligence, especially if those affiliates are in jurisdictions with lower compliance standards, the absence of face-to-face onboarding presents a higher risk than when customers are onboarded directly or through a domestic affiliate. |
| 14560d8ad004-d901-4b36-9ef6-3e4827a73a6d | Not Translated (0%) | Other delivery methods without face-to-face onboarding, such as internet banking and money services businesses, are also considered to pose a higher inherent sanctions risk. | Other delivery methods without face-to-face onboarding, such as internet banking and money services businesses, are also considered to pose a higher inherent sanctions risk. |
| 14570d8ad004-d901-4b36-9ef6-3e4827a73a6d | Not Translated (0%) | Finally, a delivery channel that processes payments quickly is a higher risk, because there is less time for potential investigation. | Finally, a delivery channel that processes payments quickly is a higher risk, because there is less time for potential investigation. |
| 14580d8ad004-d901-4b36-9ef6-3e4827a73a6d | Not Translated (0%) | As an example, compare a traditional international wire transfer to an international automated clearing house (ACH) payment. | As an example, compare a traditional international wire transfer to an international automated clearing house (ACH) payment. |
| 14590d8ad004-d901-4b36-9ef6-3e4827a73a6d | Not Translated (0%) | The ACH payment is a higher risk due to the speed of the delivery channel. | The ACH payment is a higher risk due to the speed of the delivery channel. |
| 146094e59b21-7e33-4fd0-afd9-b70156f29c54 | Not Translated (0%) | Control Effectiveness | Control Effectiveness |
| 14619bfdbd8e-729a-4211-b4dc-680a2e92903f | Not Translated (0%) | After assessing inherent risks, businesses must identify the controls they have in place to mitigate or reduce inherent risks. | After assessing inherent risks, businesses must identify the controls they have in place to mitigate or reduce inherent risks. |
| 14629bfdbd8e-729a-4211-b4dc-680a2e92903f | Not Translated (0%) | Control effectiveness (also referred to as mitigation measures or quality of risk management) is the measurement of the quality of controls used to mitigate a business’s inherent risks. | Control effectiveness (also referred to as mitigation measures or quality of risk management) is the measurement of the quality of controls used to mitigate a business’s inherent risks. |
| 14639bfdbd8e-729a-4211-b4dc-680a2e92903f | Not Translated (0%) | These controls should be both appropriate and effective to mitigate the identified sanctions risks. | These controls should be both appropriate and effective to mitigate the identified sanctions risks. |
| 14649bfdbd8e-729a-4211-b4dc-680a2e92903f | Not Translated (0%) | That is, they must be proportionate: where there is an elevated risk, the controls should be more comprehensive to mitigate that risk. | That is, they must be proportionate: where there is an elevated risk, the controls should be more comprehensive to mitigate that risk. |
| 14650f2ae17a-82d0-42f4-a4cb-5415c9655202 | Not Translated (0%) | The following is a list of the controls used within a sanctions compliance program: | The following is a list of the controls used within a sanctions compliance program: |
| 14669e1af732-cdc2-4487-9203-f53f756b6ee2 | Not Translated (0%) | Governance | Governance |
| 14675262f29e-e9c7-447e-925d-7e2cf009c9da | Not Translated (0%) | Policies and procedures | Policies and procedures |
| 146839db6bc3-0569-4347-88d2-88a3ab1d4f59 | Not Translated (0%) | Know your customer/due diligence (including beneficial ownership) | Know your customer/due diligence (including beneficial ownership) |
| 1469f4fb027d-81d3-4c9c-af30-f6045e55ea7b | Not Translated (0%) | Management information | Management information |
| 1470009cb4e3-9bbf-4be0-96ed-eff1e8dcf437 | Not Translated (0%) | Recordkeeping and retention | Recordkeeping and retention |
| 1471de375f66-518b-4478-8f18-49500a4545a8 | Not Translated (0%) | Sanctions blocks/rejections | Sanctions blocks/rejections |
| 147285af738b-cd57-46bd-bddd-7499cbf866ee | Not Translated (0%) | Monitoring | Monitoring |
| 1473a494fb17-a509-4879-9f0d-c4ebc00cddc3 | Not Translated (0%) | Training and awareness | Training and awareness |
| 1474122cbf93-debb-49be-8c7a-b9abe7bfebec | Not Translated (0%) | Independent testing | Independent testing |
| 1475f035ad62-1e74-4b7b-9a7d-7e2e5f2e9c1b | Not Translated (0%) | For example, inherent customer risk can be reduced through comprehensive know your customer (KYC) procedures to identify customers, their owners and controllers, and the nature and purpose of their business. | For example, inherent customer risk can be reduced through comprehensive know your customer (KYC) procedures to identify customers, their owners and controllers, and the nature and purpose of their business. |
| 1476f035ad62-1e74-4b7b-9a7d-7e2e5f2e9c1b | Not Translated (0%) | These procedures could require the provision of certain types of records, such as license authorizations, during the onboarding process. | These procedures could require the provision of certain types of records, such as license authorizations, during the onboarding process. |
| 1477f035ad62-1e74-4b7b-9a7d-7e2e5f2e9c1b | Not Translated (0%) | This procedure would then reduce the risk, for example, of providing trade financing for the export of a product that is restricted under a sanction. | This procedure would then reduce the risk, for example, of providing trade financing for the export of a product that is restricted under a sanction. |
| 14785cd97916-747a-417f-9627-faa9c01e9590 | Not Translated (0%) | Each of the controls listed above can help to mitigate the inherent risk levels initially assessed, thus permitting the financial institution to identify which areas of its business appear to pose higher levels of sanctions risk. | Each of the controls listed above can help to mitigate the inherent risk levels initially assessed, thus permitting the financial institution to identify which areas of its business appear to pose higher levels of sanctions risk. |
| 14798a725a9b-ea01-4f77-a467-231dc6858055 | Not Translated (0%) | Residual Risk | Residual Risk |
| 1480858a8835-838e-4991-88cb-f2f721b337c8 | Not Translated (0%) | The business’ risk appetite is significant when assessing residual risk. | The business’ risk appetite is significant when assessing residual risk. |
| 1481858a8835-838e-4991-88cb-f2f721b337c8 | Not Translated (0%) | At this stage in the assessment process, the institution can identify which areas of business are considered high risk after establishing control effectiveness. | At this stage in the assessment process, the institution can identify which areas of business are considered high risk after establishing control effectiveness. |
| 1482858a8835-838e-4991-88cb-f2f721b337c8 | Not Translated (0%) | A business has four options for managing the remaining, or residual, risks: | A business has four options for managing the remaining, or residual, risks: |
| 148368fe7ee9-cc93-4cd7-a426-702b0d6a8b11 | Not Translated (0%) | It can transfer the risk. | It can transfer the risk. |
| 148468fe7ee9-cc93-4cd7-a426-702b0d6a8b11 | Not Translated (0%) | However, because a firm cannot transfer accountability for sanctions compliance to someone else, this is not always a good option. | However, because a firm cannot transfer accountability for sanctions compliance to someone else, this is not always a good option. |
| 148568fe7ee9-cc93-4cd7-a426-702b0d6a8b11 | Not Translated (0%) | If a firm assigns responsibility to a vendor or another third party, the firm must ensure the vendor is qualified and has effective controls. | If a firm assigns responsibility to a vendor or another third party, the firm must ensure the vendor is qualified and has effective controls. |
| 14863d22d49a-5778-4232-8dc5-6c680e76fb6a | Not Translated (0%) | It can avoid the risk. | It can avoid the risk. |
| 14873d22d49a-5778-4232-8dc5-6c680e76fb6a | Not Translated (0%) | If the level of risk exceeds its risk appetite, the firm may decide to discontinue or fail to pursue a given line of products, or decide not to accept business relationships with customers who, for example, undertake business in certain countries. | If the level of risk exceeds its risk appetite, the firm may decide to discontinue or fail to pursue a given line of products, or decide not to accept business relationships with customers who, for example, undertake business in certain countries. |
| 1488a511ed4b-3bd0-4fc9-a3ac-9a11d699b0a1 | Not Translated (0%) | It can seek to further mitigate the risk by, for example, decreasing “fuzzy logic” thresholds, increasing monitoring, adopting other controls, and/or strengthening current controls to manage the risk. | It can seek to further mitigate the risk by, for example, decreasing “fuzzy logic” thresholds, increasing monitoring, adopting other controls, and/or strengthening current controls to manage the risk. |
| 1489bc3b1098-e434-4ddb-8c88-02f0414f1241 | Not Translated (0%) | It can accept the risk. | It can accept the risk. |
| 1490566126f4-c6c0-4e6f-8d87-35957c3035c2 | Not Translated (0%) | illustrates the residual risk matrix: the residual risk increases as control effectiveness weakens (e.g., via the loss of strong compliance professionals) or as inherent risk increases (e.g., the firm launches a high-risk product without competent staff to mitigate the risk). | illustrates the residual risk matrix: the residual risk increases as control effectiveness weakens (e.g., via the loss of strong compliance professionals) or as inherent risk increases (e.g., the firm launches a high-risk product without competent staff to mitigate the risk). |
| 1491cf2b943e-169f-444e-94e0-c0321fc45ab0 | Not Translated (0%) | Residual Risk Matrix | Residual Risk Matrix |
| 14928f9fc5e6-a6f9-4203-9fcc-3de36881fceb | Not Translated (0%) | Good and Poor Practices | Good and Poor Practices |
| 14933ca34f43-ce27-495d-bc8f-03abf64d5a7f | Not Translated (0%) | There are a number of good and poor practice examples applicable to conducting sanctions risk assessments, as shown in <3483/>. | There are a number of good and poor practice examples applicable to conducting sanctions risk assessments, as shown in <3483/>. |
| 1494ce510960-ea15-4b63-be64-343aed12b48c | Not Translated (0%) | Sanctions Risk Assessment: | Sanctions Risk Assessment: |
| 1495ce510960-ea15-4b63-be64-343aed12b48c | Not Translated (0%) | Good and Poor Practices | Good and Poor Practices |
| 1496c72cddce-7b36-4af5-8120-c1308d57d009 | Not Translated (0%) | Sanctions Risk Assessment: | Sanctions Risk Assessment: |
| 1497c72cddce-7b36-4af5-8120-c1308d57d009 | Not Translated (0%) | Good and Poor Practices | Good and Poor Practices |
| 1498afab494a-b1b0-4c13-ace8-26d539731153 | Not Translated (0%) | Good Practices | Good Practices |
| 1499afc28a15-51e4-4a22-9e64-030fa47cbc13 | Not Translated (0%) | Conduct a risk assessment that is suited to the business’ size and complexity. | Conduct a risk assessment that is suited to the business’ size and complexity. |
| 1500e45ba4c9-dfb4-49ed-bf86-3024371328e0 | Not Translated (0%) | Account for customers’ directors and beneficial owners. | Account for customers’ directors and beneficial owners. |
| 15012a800bdc-18ee-47da-9f75-c94db87bd631 | Not Translated (0%) | Record the methodology and procedures used. | Record the methodology and procedures used. |
| 1502139d3392-a109-407e-9d2e-f6c599b42ba0 | Not Translated (0%) | Validate the accuracy of the data. | Validate the accuracy of the data. |
| 15038f8523d3-a649-4ca7-b9aa-3493e7ea6ada | Not Translated (0%) | Include a mixture of both qualitative and quantitative analysis. | Include a mixture of both qualitative and quantitative analysis. |
| 1504e77af03a-95b0-4221-b186-327b3c60b234 | Not Translated (0%) | Use the same methodology for each risk assessment. | Use the same methodology for each risk assessment. |
| 15056e5d1d42-e47e-40dd-b5fe-10af3024ff13 | Not Translated (0%) | Additionally, risk assessments may be conducted on various assessment units. | Additionally, risk assessments may be conducted on various assessment units. |
| 15066e5d1d42-e47e-40dd-b5fe-10af3024ff13 | Not Translated (0%) | For smaller institutions, the various risk categories and controls can be assessed for the entirety of the institution under one assessment unit, for example, the branch. | For smaller institutions, the various risk categories and controls can be assessed for the entirety of the institution under one assessment unit, for example, the branch. |
| 15076e5d1d42-e47e-40dd-b5fe-10af3024ff13 | Not Translated (0%) | As institutions grow in size and complexity, the number of units and the granularity within the assessment units may grow and become more complex. | As institutions grow in size and complexity, the number of units and the granularity within the assessment units may grow and become more complex. |
| 15086e5d1d42-e47e-40dd-b5fe-10af3024ff13 | Not Translated (0%) | For example, assessment units can be established by a line of business, with all businesses contributing to the overall risk assessment for the larger financial institution. | For example, assessment units can be established by a line of business, with all businesses contributing to the overall risk assessment for the larger financial institution. |
| 15096e5d1d42-e47e-40dd-b5fe-10af3024ff13 | Not Translated (0%) | This process can continue if that larger institution is part of a global parent company that conducts an enterprise-wide risk assessment. | This process can continue if that larger institution is part of a global parent company that conducts an enterprise-wide risk assessment. |
| 15106e5d1d42-e47e-40dd-b5fe-10af3024ff13 | Not Translated (0%) | Determining the assessment units, their granularity and complexity, and how they combine with one another is important for an accurate and thorough risk assessment. | Determining the assessment units, their granularity and complexity, and how they combine with one another is important for an accurate and thorough risk assessment. |
| 15116e5d1d42-e47e-40dd-b5fe-10af3024ff13 | Not Translated (0%) | Often larger, global financial institutions struggle as their various connected entities conduct risk assessments using different methodologies. | Often larger, global financial institutions struggle as their various connected entities conduct risk assessments using different methodologies. |
| 15126e5d1d42-e47e-40dd-b5fe-10af3024ff13 | Not Translated (0%) | An important component of conducting risk assessments is consistency. | An important component of conducting risk assessments is consistency. |
| 15136e5d1d42-e47e-40dd-b5fe-10af3024ff13 | Not Translated (0%) | For this reason, the Wolfsberg Group recommends that any changes to the underlying risk assessment methodology be clearly documented and explained. | For this reason, the Wolfsberg Group recommends that any changes to the underlying risk assessment methodology be clearly documented and explained. |
| 15146e5d1d42-e47e-40dd-b5fe-10af3024ff13 | Not Translated (0%) | Otherwise, significant changes in the risk assessment results (i.e., inherent risk, control effectiveness, and residual risk) can result without context to understand the direction in which the risk is trending. | Otherwise, significant changes in the risk assessment results (i.e., inherent risk, control effectiveness, and residual risk) can result without context to understand the direction in which the risk is trending. |
| 151590329b37-9300-463d-9182-ccaa72ee7bd1 | Not Translated (0%) | According to OFAC’s A Framework for OFAC Compliance Commitments | According to OFAC’s A Framework for OFAC Compliance Commitments |
| 1516070fbfe0-7c84-4bb2-aedd-aca7f537db89 | Not Translated (0%) | US Department of the Treasury, “OFAC Issues a Framework for Compliance Commitments,” May 2, 2019. | US Department of the Treasury, “OFAC Issues a Framework for Compliance Commitments,” May 2, 2019. |
| 1517e4b3a4a1-c22f-4fc7-80bc-c4ea4713e534 | Not Translated (0%) | , organizations should conduct a routine and, if appropriate, ongoing risk assessment. | , organizations should conduct a routine and, if appropriate, ongoing risk assessment. |
| 1518e4b3a4a1-c22f-4fc7-80bc-c4ea4713e534 | Not Translated (0%) | Although the document acknowledges that there is no “one size fits all” risk assessment, the exercise should generally consist of a holistic review of the organization from top to bottom to assess its touchpoints to the outside world. | Although the document acknowledges that there is no “one size fits all” risk assessment, the exercise should generally consist of a holistic review of the organization from top to bottom to assess its touchpoints to the outside world. |
| 1519e4b3a4a1-c22f-4fc7-80bc-c4ea4713e534 | Not Translated (0%) | This process allows the organization to identify potential areas in which it may, directly or indirectly, engage with OFAC–prohibited persons, parties, countries, and/or regions. | This process allows the organization to identify potential areas in which it may, directly or indirectly, engage with OFAC–prohibited persons, parties, countries, and/or regions. |
| 1520e4b3a4a1-c22f-4fc7-80bc-c4ea4713e534 | Not Translated (0%) | For example, an organization’s SCP may include an assessment of the following: | For example, an organization’s SCP may include an assessment of the following: |
| 15216cc7f235-eb84-490b-ba9b-1e7843405911 | Not Translated (0%) | Its customers, supply chains, intermediaries, and counterparties | Its customers, supply chains, intermediaries, and counterparties |
| 152209b2df2d-1220-4e16-889b-c7d8589c5e74 | Not Translated (0%) | The products and services it offers, including how and where such items fit into other financial or commercial products, services, networks, and/or systems | The products and services it offers, including how and where such items fit into other financial or commercial products, services, networks, and/or systems |
| 1523735c1f93-b4f7-49a1-919d-a259eb2549c2 | Not Translated (0%) | The geographic locations of the organization, as well as its customers, supply chains, intermediaries, and counterparties | The geographic locations of the organization, as well as its customers, supply chains, intermediaries, and counterparties |
| 1524bb1b1f5c-dbaa-4841-ad57-58f857fc32f2 | Not Translated (0%) | Risk assessments and sanctions-related due diligence procedures also are important during mergers and acquisitions, particularly in scenarios involving non–US companies or corporations. | Risk assessments and sanctions-related due diligence procedures also are important during mergers and acquisitions, particularly in scenarios involving non–US companies or corporations. |
| 152507d0ae94-c735-4861-a10a-1d89d86e3177 | Not Translated (0%) | Staying Current on Sanctions | Staying Current on Sanctions |
| 1526ac76cae7-080b-4fad-a470-1d56fe86277d | Not Translated (0%) | Sanctions are continually changing, and effectively monitoring these changes mitigates the risk inherent in this change. | Sanctions are continually changing, and effectively monitoring these changes mitigates the risk inherent in this change. |
| 1527ac76cae7-080b-4fad-a470-1d56fe86277d | Not Translated (0%) | That means practitioners must work to stay informed regarding the global political climate. | That means practitioners must work to stay informed regarding the global political climate. |
| 1528ac76cae7-080b-4fad-a470-1d56fe86277d | Not Translated (0%) | Keeping current can include requiring vendors to provide updated lists (although this method is not completely reliable), monitoring government websites through subscriptions, and creating tailored news alerts. | Keeping current can include requiring vendors to provide updated lists (although this method is not completely reliable), monitoring government websites through subscriptions, and creating tailored news alerts. |
| 1529ac76cae7-080b-4fad-a470-1d56fe86277d | Not Translated (0%) | An example of creating a tailored news alert is entering “sanctions” AND “Iran” in a Google news feed. | An example of creating a tailored news alert is entering “sanctions” AND “Iran” in a Google news feed. |
| 1530ac76cae7-080b-4fad-a470-1d56fe86277d | Not Translated (0%) | Another useful resource is the ACAMS newsletter moneylaundering.com. | Another useful resource is the ACAMS newsletter moneylaundering.com. |
| 15310cbb33e8-9fe7-424b-91dd-ee7ec4e66d6a | Not Translated (0%) | The following is an example of the changing nature of sanctions: | The following is an example of the changing nature of sanctions: |
| 15320cbb33e8-9fe7-424b-91dd-ee7ec4e66d6a | Not Translated (0%) | In July of 2015, the P5+1 (China, France, Germany, Russia, the UK, and the United States) worked with Iran to reach a Joint Comprehensive Plan of Action (JCPOA). | In July of 2015, the P5+1 (China, France, Germany, Russia, the UK, and the United States) worked with Iran to reach a Joint Comprehensive Plan of Action (JCPOA). |
| 15330cbb33e8-9fe7-424b-91dd-ee7ec4e66d6a | Not Translated (0%) | The JCPOA came into effect on January 16, 2016, while President Obama was still in office in the United States. | The JCPOA came into effect on January 16, 2016, while President Obama was still in office in the United States. |
| 15340cbb33e8-9fe7-424b-91dd-ee7ec4e66d6a | Not Translated (0%) | The presidential election later that year ushered in a new president and a new political party. | The presidential election later that year ushered in a new president and a new political party. |
| 15350cbb33e8-9fe7-424b-91dd-ee7ec4e66d6a | Not Translated (0%) | President Trump terminated the country’s participation in the JCPOA effective May of 2018. | President Trump terminated the country’s participation in the JCPOA effective May of 2018. |
| 15360cbb33e8-9fe7-424b-91dd-ee7ec4e66d6a | Not Translated (0%) | Even still, the administration provided temporary waivers to a limited number of countries to buy Iranian oil. | Even still, the administration provided temporary waivers to a limited number of countries to buy Iranian oil. |
| 15370cbb33e8-9fe7-424b-91dd-ee7ec4e66d6a | Not Translated (0%) | This example highlights the fact that sanctions are largely a matter of foreign policy, changing as political figures and parties leave and come into power. | This example highlights the fact that sanctions are largely a matter of foreign policy, changing as political figures and parties leave and come into power. |
| 153852eb623d-4578-47ba-8974-3657d0753f1c | Not Translated (0%) | It is also important to stay abreast of current changes facing the European sanctions regime. | It is also important to stay abreast of current changes facing the European sanctions regime. |
| 153952eb623d-4578-47ba-8974-3657d0753f1c | Not Translated (0%) | The European Commission has published a Sanctions Map | The European Commission has published a Sanctions Map |
| 1540b595db66-41e5-4325-8f41-108495494eb0 | Not Translated (0%) | EU Sanctions Map. | EU Sanctions Map. |
| 1541aee24cba-bb78-4202-99d8-438a12a4eb88 | Not Translated (0%) | , which provides useful background and up-to-date information on the current status of its regime. | , which provides useful background and up-to-date information on the current status of its regime. |
| 1542aee24cba-bb78-4202-99d8-438a12a4eb88 | Not Translated (0%) | The same website offers guidance on the implementation of measures in relation to the different sanctions regimes, such as Syria and Crimea/Sevastopol. | The same website offers guidance on the implementation of measures in relation to the different sanctions regimes, such as Syria and Crimea/Sevastopol. |
| 15436d7dd325-edfa-4d34-bc1e-ea380cb21d75 | Not Translated (0%) | The UN Security Council website is also an important source of information, as the Council can resort to imposing sanctions and even authorize the use of force to maintain or restore international peace and security. | The UN Security Council website is also an important source of information, as the Council can resort to imposing sanctions and even authorize the use of force to maintain or restore international peace and security. |
| 1544dd173eb7-e76c-4b4f-9875-04d651e73a71 | Not Translated (0%) | United Nations Security Council. | United Nations Security Council. |
| 1545918618bf-5abc-4df6-a62f-56941c895749 | Not Translated (0%) | Following UN Security Council press releases is a useful way to keep abreast of global security developments and changes to the UN consolidated sanctions list. | Following UN Security Council press releases is a useful way to keep abreast of global security developments and changes to the UN consolidated sanctions list. |
| 1546552b5621-1b9f-41ef-9d2a-d7579254cd04 | Not Translated (0%) | OFAC administers sanctions programs that include both comprehensive and selective sanctions, “using the blocking of assets and trade restrictions to accomplish foreign policy and national security goals.” | OFAC administers sanctions programs that include both comprehensive and selective sanctions, “using the blocking of assets and trade restrictions to accomplish foreign policy and national security goals.” |
| 1547552b5621-1b9f-41ef-9d2a-d7579254cd04 | Not Translated (0%) | You can check the OFAC website for additional information and register for Recent Action updates. | You can check the OFAC website for additional information and register for Recent Action updates. |
| 1548c3878601-5eb9-486b-b48f-21966ca6b631 | Not Translated (0%) | Policies, Procedures, and Internal Controls | Policies, Procedures, and Internal Controls |
| 154997bfca3a-8cb6-4972-bc2b-08833c0d92b8 | Not Translated (0%) | An effective sanctions compliance program should include internal controls, including written policies and procedures, in order to identify, interdict, escalate, report (as appropriate), and maintain records pertaining to any activity that may be prohibited according to relevant regulations and legislation. | An effective sanctions compliance program should include internal controls, including written policies and procedures, in order to identify, interdict, escalate, report (as appropriate), and maintain records pertaining to any activity that may be prohibited according to relevant regulations and legislation. |
| 15502cc9f05f-6b57-4edd-8fde-07afa36572ec | Not Translated (0%) | Internal controls should outline roles and responsibilities, set clear expectations, define procedures and processes, and minimize the risks identified in the sanctions compliance risk assessment. | Internal controls should outline roles and responsibilities, set clear expectations, define procedures and processes, and minimize the risks identified in the sanctions compliance risk assessment. |
| 1551baaf3166-c3a5-4c7f-adcd-75da3ed9c0ad | Not Translated (0%) | Policies and procedures should clearly state disciplinary measures for noncompliance and be enforced. | Policies and procedures should clearly state disciplinary measures for noncompliance and be enforced. |
| 1552baaf3166-c3a5-4c7f-adcd-75da3ed9c0ad | Not Translated (0%) | Sanctions compliance programs should include a process for self-identifying weaknesses outside of the regular risk assessment. | Sanctions compliance programs should include a process for self-identifying weaknesses outside of the regular risk assessment. |
| 1553baaf3166-c3a5-4c7f-adcd-75da3ed9c0ad | Not Translated (0%) | Identification of weaknesses provides evidence of a culture of compliance. | Identification of weaknesses provides evidence of a culture of compliance. |
| 1554baaf3166-c3a5-4c7f-adcd-75da3ed9c0ad | Not Translated (0%) | They should be documented (including through root cause analysis of any compliance breaches) and remediated in order to prevent activities that could violate the sanctions programs administered by OFAC. | They should be documented (including through root cause analysis of any compliance breaches) and remediated in order to prevent activities that could violate the sanctions programs administered by OFAC. |
| 15555fe698c2-700b-4165-9f25-16179f6fd83b | Not Translated (0%) | Given the dynamic nature of sanctions regimes, SCPs need to be capable of adjusting rapidly to any changes, such as: | Given the dynamic nature of sanctions regimes, SCPs need to be capable of adjusting rapidly to any changes, such as: |
| 1556167b0abc-896e-4290-9f30-954916d1fc08 | Not Translated (0%) | Updates to OFAC’s Specially Designated Nationals (SDN) and Sectoral Sanctions Identifications (SSI) lists | Updates to OFAC’s Specially Designated Nationals (SDN) and Sectoral Sanctions Identifications (SSI) lists |
| 155732e56d36-7515-4b91-a723-82d0a8490d14 | Not Translated (0%) | Updates to any EU lists | Updates to any EU lists |
| 1558908556dd-9548-4d16-93ba-b4df52d30e47 | Not Translated (0%) | Updates to any other lists | Updates to any other lists |
| 1559181d9e30-7158-4f5b-9120-68518e07e618 | Not Translated (0%) | Prohibitions imposed on targeted foreign countries, governments, regions, and persons through the enactment of (1) new legislation; (2) issuance of new executive orders, regulations, or guidance published; and (3) issuance of general licenses by OFAC. | Prohibitions imposed on targeted foreign countries, governments, regions, and persons through the enactment of (1) new legislation; (2) issuance of new executive orders, regulations, or guidance published; and (3) issuance of general licenses by OFAC. |
| 156039b9f7d9-10a7-407b-8f29-77c8e4244c7d | Not Translated (0%) | US Department of the Treasury, “OFAC Issues a Framework for Compliance Commitments,” May 2, 2019. | US Department of the Treasury, “OFAC Issues a Framework for Compliance Commitments,” May 2, 2019. |
| 15618065458f-1a67-40ca-b02d-d450256d61f5 | Not Translated (0%) | The establishment and continual development of a financial institution’s policies, procedures, and controls form the foundation of a successful sanctions compliance program. | The establishment and continual development of a financial institution’s policies, procedures, and controls form the foundation of a successful sanctions compliance program. |
| 15628065458f-1a67-40ca-b02d-d450256d61f5 | Not Translated (0%) | Together, these three parts define and support the entire program, as well as serve as a blueprint for how an institution fulfills its regulatory requirements. | Together, these three parts define and support the entire program, as well as serve as a blueprint for how an institution fulfills its regulatory requirements. |
| 15638065458f-1a67-40ca-b02d-d450256d61f5 | Not Translated (0%) | All three parts should be designed to mitigate the identified risks and take into account the applicable laws and regulations with which the financial institution must comply. | All three parts should be designed to mitigate the identified risks and take into account the applicable laws and regulations with which the financial institution must comply. |
| 15648065458f-1a67-40ca-b02d-d450256d61f5 | Not Translated (0%) | They should clearly indicate the risk appetite of the business; in other words, what risks the business is prepared to accept and which it is not willing to accept. | They should clearly indicate the risk appetite of the business; in other words, what risks the business is prepared to accept and which it is not willing to accept. |
| 1565ae9e4644-99ea-48bc-9989-90b668387d8a | Not Translated (0%) | compares sanctions compliance policies, procedures, and controls. | compares sanctions compliance policies, procedures, and controls. |
| 1566f776ee54-8360-4a1c-939f-f67b130ae6a7 | Not Translated (0%) | Sanctions Compliance Policies, Procedures, and Internal Controls | Sanctions Compliance Policies, Procedures, and Internal Controls |
| 156745277a31-00a6-49c8-8863-a5b1e81177ab | Not Translated (0%) | Sanctions Compliance Policies, Procedures, and Internal Controls | Sanctions Compliance Policies, Procedures, and Internal Controls |
| 156819aff8f6-27ec-4a10-9712-e0c5b4f805c9 | Not Translated (0%) | Policies | Policies |
| 1569add3e467-67a1-43bc-8658-4369cc9a23e3 | Not Translated (0%) | Clear and simple high-level statements that are uniform across the entire organization (sets the tone from the top) | Clear and simple high-level statements that are uniform across the entire organization (sets the tone from the top) |
| 1570ace40a15-4b56-4f4c-ac87-768beada95d1 | Not Translated (0%) | Define roles and responsibilities | Define roles and responsibilities |
| 15717d9b5b33-7daa-4367-b4b1-2469aad8a228 | Not Translated (0%) | Approved by executive management or the board of directors | Approved by executive management or the board of directors |
| 1572d0596a75-5c6f-464c-9b53-00fca495c631 | Not Translated (0%) | Reflect the high-level responsibilities of the stakeholders throughout the organization | Reflect the high-level responsibilities of the stakeholders throughout the organization |
| 1573555fbbbf-1f86-4a1f-b62e-3cbe7ea7f579 | Not Translated (0%) | Establish minimum standards and requirements that must be met | Establish minimum standards and requirements that must be met |
| 1574fb29bd83-24c6-4ea9-859e-1c7219a77c5e | Not Translated (0%) | Procedures | Procedures |
| 15757609e1ad-fa40-427a-b69f-dcfb9a98bd7c | Not Translated (0%) | Translate the sanctions compliance policies into an acceptable and workable practice, tasking the stakeholders with their respective responsibilities | Translate the sanctions compliance policies into an acceptable and workable practice, tasking the stakeholders with their respective responsibilities |
| 15762c6cde11-0d90-4226-a76a-67cc55e29ff4 | Not Translated (0%) | May be established at the operational (not executive) level of the financial institution | May be established at the operational (not executive) level of the financial institution |
| 15777f0b4c5c-fc27-4547-a4cb-589e99a38910 | Not Translated (0%) | Serve as the instructions for how an institution expects something to be done | Serve as the instructions for how an institution expects something to be done |
| 1578c92ea270-c146-4640-97b1-cecbe96c1f61 | Not Translated (0%) | Much more detailed than sanctions compliance policies | Much more detailed than sanctions compliance policies |
| 1579bc6780fe-86b7-47bf-a1cc-2fee9f1ec985 | Not Translated (0%) | Reviewed and updated regularly | Reviewed and updated regularly |
| 1580fce6d7da-cdb6-4db7-9050-4dc7d420929e | Not Translated (0%) | Internal Controls | Internal Controls |
| 15813fc54ccd-58bc-4287-8181-fc61b131d20a | Not Translated (0%) | The internal technology or tools the financial institution utilizes to ensure the sanctions compliance program is functioning as intended and within predefined parameters | The internal technology or tools the financial institution utilizes to ensure the sanctions compliance program is functioning as intended and within predefined parameters |
| 15824582bc9d-77d2-4137-b99d-4ed9f60d0b5a | Not Translated (0%) | Identify, interdict, escalate, report, and maintain records | Identify, interdict, escalate, report, and maintain records |
| 1583c913d90b-fb0b-4643-b565-6805a1c57457 | Not Translated (0%) | Alert sanctions compliance team to potential outliers or deviations from normal policy that may need to be reviewed | Alert sanctions compliance team to potential outliers or deviations from normal policy that may need to be reviewed |
| 15842fb552b5-6cc3-4c90-97b1-636eb7cc4e33 | Not Translated (0%) | Includes management reports, automated review systems, and the utilization of multiple reviewers | Includes management reports, automated review systems, and the utilization of multiple reviewers |
| 15856f9a841d-be3c-4c4a-956d-9d70be280fc7 | Not Translated (0%) | Although many internal controls are applied by the first line of defense (i.e., the employees who are responsible for onboarding customers), every employee throughout a financial institution, at all levels of the organization, must contribute to the creation, maintenance, and overall success of the compliance program. | Although many internal controls are applied by the first line of defense (i.e., the employees who are responsible for onboarding customers), every employee throughout a financial institution, at all levels of the organization, must contribute to the creation, maintenance, and overall success of the compliance program. |
| 1586bd4f06be-8c1d-43b4-97ec-5a152fddef3d | Not Translated (0%) | It is critical for larger financial institutions to adopt an enterprise-wide approach that allows for consistency in the manner in which the institution manages its compliance risk. | It is critical for larger financial institutions to adopt an enterprise-wide approach that allows for consistency in the manner in which the institution manages its compliance risk. |
| 1587bd4f06be-8c1d-43b4-97ec-5a152fddef3d | Not Translated (0%) | At the same time, it is necessary to accommodate regional and/or business line–specific requirements. | At the same time, it is necessary to accommodate regional and/or business line–specific requirements. |
| 1588bd4f06be-8c1d-43b4-97ec-5a152fddef3d | Not Translated (0%) | For example, enterprise-wide compliance risk models in financial institutions that operate in multiple regions and/or countries must reflect the local regulatory requirements. | For example, enterprise-wide compliance risk models in financial institutions that operate in multiple regions and/or countries must reflect the local regulatory requirements. |
| 1589bd4f06be-8c1d-43b4-97ec-5a152fddef3d | Not Translated (0%) | This can be achieved by having a different version of the compliance program or by having country-specific addenda to the global program. | This can be achieved by having a different version of the compliance program or by having country-specific addenda to the global program. |
| 159035fbb79b-2997-4e10-828e-512c018e8ce3 | Not Translated (0%) | Foreign or overseas branches of financial institutions should also adopt the stricter requirements (both regulatory and internal policy) of their head offices when there are differences in the levels of rigor between the regulatory regimes. | Foreign or overseas branches of financial institutions should also adopt the stricter requirements (both regulatory and internal policy) of their head offices when there are differences in the levels of rigor between the regulatory regimes. |
| 159135fbb79b-2997-4e10-828e-512c018e8ce3 | Not Translated (0%) | For example, if the head office’s jurisdiction requires batch screening on a weekly basis and the foreign branch’s jurisdiction requires batch screening on a quarterly basis, then the foreign branch should conduct batch screening on a weekly basis. | For example, if the head office’s jurisdiction requires batch screening on a weekly basis and the foreign branch’s jurisdiction requires batch screening on a quarterly basis, then the foreign branch should conduct batch screening on a weekly basis. |
| 1592151bfe9f-f474-4c55-92dc-43a7fd24be84 | Not Translated (0%) | While this same principle does not necessarily apply in regard to head offices adopting the stricter regulatory requirements of their foreign branches, head offices should at the very least consider variances in requirements for adoption as a matter of effective risk management. | While this same principle does not necessarily apply in regard to head offices adopting the stricter regulatory requirements of their foreign branches, head offices should at the very least consider variances in requirements for adoption as a matter of effective risk management. |
| 15930a1bd665-e102-4277-b259-e59a2e9a601e | Not Translated (0%) | Key internal sanctions compliance policies should be established and approved by executive management and the board of directors. | Key internal sanctions compliance policies should be established and approved by executive management and the board of directors. |
| 15940a1bd665-e102-4277-b259-e59a2e9a601e | Not Translated (0%) | These policies set the tone for the organization. | These policies set the tone for the organization. |
| 15950a1bd665-e102-4277-b259-e59a2e9a601e | Not Translated (0%) | Although the organization’s policy may be a high-level statement of principles, it serves as the basis for procedures and controls that provide details concerning how lines of business will comply with laws, regulations, and the organization’s compliance policies. | Although the organization’s policy may be a high-level statement of principles, it serves as the basis for procedures and controls that provide details concerning how lines of business will comply with laws, regulations, and the organization’s compliance policies. |
| 1596fabbba26-97ce-44cc-9371-989b465fb437 | Not Translated (0%) | The standard sanctions compliance operating procedures should be drafted at the operational level of the financial institution. | The standard sanctions compliance operating procedures should be drafted at the operational level of the financial institution. |
| 1597fabbba26-97ce-44cc-9371-989b465fb437 | Not Translated (0%) | These procedures must be modified and updated, as needed, to reflect changes in laws, regulations, and products, as well as organizational changes. | These procedures must be modified and updated, as needed, to reflect changes in laws, regulations, and products, as well as organizational changes. |
| 1598fabbba26-97ce-44cc-9371-989b465fb437 | Not Translated (0%) | These procedures are more detailed than the corresponding compliance policies; they translate policy into acceptable and workable practices. | These procedures are more detailed than the corresponding compliance policies; they translate policy into acceptable and workable practices. |
| 1599fabbba26-97ce-44cc-9371-989b465fb437 | Not Translated (0%) | The procedures also form the basis of an important component of sanctions compliance training and compliance monitoring programs. | The procedures also form the basis of an important component of sanctions compliance training and compliance monitoring programs. |
| 1600fabbba26-97ce-44cc-9371-989b465fb437 | Not Translated (0%) | One example is using procedures that identify customers, their owners and/or controllers, and the nature and purpose of their businesses to reduce customer risk. | One example is using procedures that identify customers, their owners and/or controllers, and the nature and purpose of their businesses to reduce customer risk. |
| 1601fabbba26-97ce-44cc-9371-989b465fb437 | Not Translated (0%) | Another example is procedures that require the provision of certain types of records, such as license authorizations, during the onboarding process to reduce the risk of providing trade financing for the export of a product that is restricted under a sanction. | Another example is procedures that require the provision of certain types of records, such as license authorizations, during the onboarding process to reduce the risk of providing trade financing for the export of a product that is restricted under a sanction. |
| 16026428b64a-8a6b-4072-97d3-0d8e6bc9358e | Not Translated (0%) | In addition to policies and procedures, institutions must establish processes to support and facilitate the effective implementation of procedures. | In addition to policies and procedures, institutions must establish processes to support and facilitate the effective implementation of procedures. |
| 16036428b64a-8a6b-4072-97d3-0d8e6bc9358e | Not Translated (0%) | Although policies and procedures provide important guidance, the sanctions compliance program also relies on a variety of internal controls, including management reports and other built-in safeguards, which keep the program working effectively. | Although policies and procedures provide important guidance, the sanctions compliance program also relies on a variety of internal controls, including management reports and other built-in safeguards, which keep the program working effectively. |
| 16046428b64a-8a6b-4072-97d3-0d8e6bc9358e | Not Translated (0%) | These internal controls should enable the compliance organization to recognize deviations from standard procedures and safety protocols. | These internal controls should enable the compliance organization to recognize deviations from standard procedures and safety protocols. |
| 16056428b64a-8a6b-4072-97d3-0d8e6bc9358e | Not Translated (0%) | A matter as simple as requiring a corporate officer’s approval or two signatures for transactions that exceed a prescribed amount could reflect a critical internal control element that, if ignored, seriously weakens an institution’s compliance program and attracts unwanted attention from supervisory authorities. | A matter as simple as requiring a corporate officer’s approval or two signatures for transactions that exceed a prescribed amount could reflect a critical internal control element that, if ignored, seriously weakens an institution’s compliance program and attracts unwanted attention from supervisory authorities. |
| 16066428b64a-8a6b-4072-97d3-0d8e6bc9358e | Not Translated (0%) | Similarly, a second review and approval of actions considered to be departures from policy can be helpful if subsequent questions arise. | Similarly, a second review and approval of actions considered to be departures from policy can be helpful if subsequent questions arise. |
| 16076428b64a-8a6b-4072-97d3-0d8e6bc9358e | Not Translated (0%) | Other effective controls use technology, such as account opening systems that force the entry of required information and automated account monitoring programs. | Other effective controls use technology, such as account opening systems that force the entry of required information and automated account monitoring programs. |
| 16088fd42d25-8ad4-4b7e-99e0-ca1ecfdaac73 | Not Translated (0%) | Sanctions compliance programs should be in writing and include the policies, procedures, and controls that are designed to prevent, detect, and deter sanctions evasions and violations, including how the institution will: | Sanctions compliance programs should be in writing and include the policies, procedures, and controls that are designed to prevent, detect, and deter sanctions evasions and violations, including how the institution will: |
| 1609b7a2989e-2806-4372-a22e-c8299af1cc83 | Not Translated (0%) | Identify high-risk operations (products, services, delivery channels, customers, and geographic locations). | Identify high-risk operations (products, services, delivery channels, customers, and geographic locations). |
| 161065fe3063-110f-45ec-a0cf-35f57345bd65 | Not Translated (0%) | Provide for regular updates to the institution’s risk profile and ensure that the sanctions compliance program is tailored to manage the institution’s risk exposure. | Provide for regular updates to the institution’s risk profile and ensure that the sanctions compliance program is tailored to manage the institution’s risk exposure. |
| 161165fe3063-110f-45ec-a0cf-35f57345bd65 | Not Translated (0%) | Immediate action is required when sanctions regimes and other relevant legislation are updated or revised in any way. | Immediate action is required when sanctions regimes and other relevant legislation are updated or revised in any way. |
| 16122dfa3856-7f6c-4aa1-b3a5-b00831a25196 | Not Translated (0%) | Inform the board of directors (or a committee of the board) and senior management of compliance initiatives, known compliance deficiencies, blocked or rejected transactions, and corrective actions taken. | Inform the board of directors (or a committee of the board) and senior management of compliance initiatives, known compliance deficiencies, blocked or rejected transactions, and corrective actions taken. |
| 1613f4dfe8e2-8c59-4219-a9bd-f3d636740aa9 | Not Translated (0%) | Develop and maintain a system of metrics reporting that provides accurate and timely information on the status of the sanctions compliance program, including statistics on key elements of the program, such as the number of transactions monitored, alerts generated, cases created, and transactions that have been blocked or rejected. | Develop and maintain a system of metrics reporting that provides accurate and timely information on the status of the sanctions compliance program, including statistics on key elements of the program, such as the number of transactions monitored, alerts generated, cases created, and transactions that have been blocked or rejected. |
| 16148cc40d79-747e-40b6-9a9d-dc0c2cb69edd | Not Translated (0%) | Assign clear accountability for performance of duties within the compliance program. | Assign clear accountability for performance of duties within the compliance program. |
| 161567dbe98f-d734-4589-b0f1-10982427f7f8 | Not Translated (0%) | Provide for program continuity despite changes in management and/or employee composition or structure. | Provide for program continuity despite changes in management and/or employee composition or structure. |
| 16163e8da5b7-29c0-456b-9b9d-8908eeb41813 | Not Translated (0%) | Meet all regulatory requirements and recommendations for sanctions compliance. | Meet all regulatory requirements and recommendations for sanctions compliance. |
| 161729e7b3ea-5203-454a-aa7c-17d2b83688bb | Not Translated (0%) | Implement risk-based sanctions compliance CDD policies, procedures, and processes. | Implement risk-based sanctions compliance CDD policies, procedures, and processes. |
| 161809053872-7b51-47a1-be16-9a9b5b64dbb3 | Not Translated (0%) | Provide for dual controls and segregation of duties. | Provide for dual controls and segregation of duties. |
| 161910227d68-ad25-45c1-bc39-0a9eecc2796d | Not Translated (0%) | Comply with all record-keeping requirements, including retention and retrieval of records. | Comply with all record-keeping requirements, including retention and retrieval of records. |
| 16202ba20e14-6fa4-4a6c-94a9-3fbdea915fe5 | Not Translated (0%) | Provide sufficient controls and monitoring systems for the timely detection and reporting of potentially suspicious activity, including a procedure for recording the rationale for not reporting activity as a result of the findings of any investigation. | Provide sufficient controls and monitoring systems for the timely detection and reporting of potentially suspicious activity, including a procedure for recording the rationale for not reporting activity as a result of the findings of any investigation. |
| 16212ec49fba-26e9-4193-bce3-72bbbd791b5b | Not Translated (0%) | Establish clear accountability lines and responsibilities to ensure that there is appropriate and effective oversight of staff who engage in activities that may pose a greater sanctions compliance risk. | Establish clear accountability lines and responsibilities to ensure that there is appropriate and effective oversight of staff who engage in activities that may pose a greater sanctions compliance risk. |
| 16229710fe92-5499-46b3-81d7-ee5fc1d6014b | Not Translated (0%) | Establish training requirements and standards to ensure that employees understand the procedures they need to follow, including their relevance to mitigating compliance risks in their departments or areas of responsibility. | Establish training requirements and standards to ensure that employees understand the procedures they need to follow, including their relevance to mitigating compliance risks in their departments or areas of responsibility. |
| 16233b9c480a-fcfc-4c36-ba26-fb3efd712ef4 | Not Translated (0%) | Clearly explain the importance of reporting suspicious activity, how and to whom concerns should be raised, the role of the compliance officer, and what the “tipping off” restriction means in practice. | Clearly explain the importance of reporting suspicious activity, how and to whom concerns should be raised, the role of the compliance officer, and what the “tipping off” restriction means in practice. |
| 16243b9c480a-fcfc-4c36-ba26-fb3efd712ef4 | Not Translated (0%) | A sanctions compliance program may interdict a transaction for various reasons, some out of an abundance of caution and some due to actual matches against a sanctions list. | A sanctions compliance program may interdict a transaction for various reasons, some out of an abundance of caution and some due to actual matches against a sanctions list. |
| 16253b9c480a-fcfc-4c36-ba26-fb3efd712ef4 | Not Translated (0%) | Although not all interdicted transactions require an STR, processes and protocols should be in place to ensure that transactions that violate or attempt to circumvent the AML laws are reviewed by the AML function for suspicious activity. | Although not all interdicted transactions require an STR, processes and protocols should be in place to ensure that transactions that violate or attempt to circumvent the AML laws are reviewed by the AML function for suspicious activity. |
| 16263b9c480a-fcfc-4c36-ba26-fb3efd712ef4 | Not Translated (0%) | A single transaction with “IRAN” in the country code may not be a violation of AML laws requiring an STR, but multiple transactions that attempt to hide the final destination most likely would be. | A single transaction with “IRAN” in the country code may not be a violation of AML laws requiring an STR, but multiple transactions that attempt to hide the final destination most likely would be. |
| 16274ac2b537-b674-47d0-b4b0-4b7c8904f9fc | Not Translated (0%) | Incorporate into all job descriptions and performance review processes the requirement to comply at all times with policies and procedures related to sanctions compliance. | Incorporate into all job descriptions and performance review processes the requirement to comply at all times with policies and procedures related to sanctions compliance. |
| 16284ac2b537-b674-47d0-b4b0-4b7c8904f9fc | Not Translated (0%) | Noncompliance with these should be managed in accordance with existing disciplinary processes. | Noncompliance with these should be managed in accordance with existing disciplinary processes. |
| 16295f91d32c-b850-4372-822b-47637106609a | Not Translated (0%) | Develop and implement screening programs to ensure high standards when hiring employees. | Develop and implement screening programs to ensure high standards when hiring employees. |
| 1630f4411bc8-367f-47eb-a606-6782edf3e792 | Not Translated (0%) | Implement appropriate disciplinary action for employees who consistently fail to perform in accordance with the sanctions compliance program. | Implement appropriate disciplinary action for employees who consistently fail to perform in accordance with the sanctions compliance program. |
| 1631f353d563-cb5c-4b0e-8438-10ab32bbe067 | Not Translated (0%) | Develop and implement quality assurance testing programs to assess the effectiveness of the compliance program’s implementation and execution of its requirements. | Develop and implement quality assurance testing programs to assess the effectiveness of the compliance program’s implementation and execution of its requirements. |
| 1632f353d563-cb5c-4b0e-8438-10ab32bbe067 | Not Translated (0%) | This is separate from the independent audit requirement but serves a similar purpose—to assess the ongoing effectiveness of the program. | This is separate from the independent audit requirement but serves a similar purpose—to assess the ongoing effectiveness of the program. |
| 1633184f99a4-4ce7-45ed-9441-844731e4bf26 | Not Translated (0%) | The level of sophistication a financial institution needs to maintain concerning its policies, procedures, and internal controls directly correlates to the institution’s size, structure, risk, and complexity of products, amongst other items. | The level of sophistication a financial institution needs to maintain concerning its policies, procedures, and internal controls directly correlates to the institution’s size, structure, risk, and complexity of products, amongst other items. |
| 1634184f99a4-4ce7-45ed-9441-844731e4bf26 | Not Translated (0%) | Failures to establish, perform, follow, and maintain adequate policies, procedures, and controls can lead to severe enforcements against the institution or designated individuals involved. | Failures to establish, perform, follow, and maintain adequate policies, procedures, and controls can lead to severe enforcements against the institution or designated individuals involved. |
| 163508fd7555-3c25-4b3c-9ab1-865e55559147 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 163608fd7555-3c25-4b3c-9ab1-865e55559147 | Not Translated (0%) | STATE STREET BANK AND TRUST, 2015 | STATE STREET BANK AND TRUST, 2015 |
| 1637b65f7900-357d-4abb-817f-27136ab57fc4 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 163844763be7-4791-49b2-9073-588add03eace | Not Translated (0%) | In May 2019, OFAC issued a Finding of Violation with no monetary penalty against State Street Bank and Trust (SSBT) for payments made under an employee retirement plan. | In May 2019, OFAC issued a Finding of Violation with no monetary penalty against State Street Bank and Trust (SSBT) for payments made under an employee retirement plan. |
| 163944763be7-4791-49b2-9073-588add03eace | Not Translated (0%) | SSBT, acting as trustee, made 45 pension payments totaling $11,365.44 to a plan participant who was a US citizen with a US bank account, but who resided in Tehran, Iran. | SSBT, acting as trustee, made 45 pension payments totaling $11,365.44 to a plan participant who was a US citizen with a US bank account, but who resided in Tehran, Iran. |
| 1640d7c010f2-86eb-45d8-9643-77f0f3b73d6d | Not Translated (0%) | US Department of the Treasury, Enforcement Information for May 28, 2019. | US Department of the Treasury, Enforcement Information for May 28, 2019. |
| 1641e2401562-d511-45da-b266-3c8f1003a85a | Not Translated (0%) | All of these transactions caused alerts within SSBT’s own centralized system. | All of these transactions caused alerts within SSBT’s own centralized system. |
| 1642e2401562-d511-45da-b266-3c8f1003a85a | Not Translated (0%) | However, SSBT used Retiree Service Staff (RSS) within the first-line business unit to manage the company’s relationship with the retirement plan. | However, SSBT used Retiree Service Staff (RSS) within the first-line business unit to manage the company’s relationship with the retirement plan. |
| 1643e2401562-d511-45da-b266-3c8f1003a85a | Not Translated (0%) | RSS had its own sanctions screening tool and did not utilize SSBT’s centralized screening tool. | RSS had its own sanctions screening tool and did not utilize SSBT’s centralized screening tool. |
| 1644e2401562-d511-45da-b266-3c8f1003a85a | Not Translated (0%) | Moreover, RSS’s escalation protocols dictated that potential sanctions matches be escalated to business-aligned compliance staff rather than SSBT’s centralized sanctions compliance specialists. | Moreover, RSS’s escalation protocols dictated that potential sanctions matches be escalated to business-aligned compliance staff rather than SSBT’s centralized sanctions compliance specialists. |
| 16456988cf76-301f-4522-8052-bc38e0a0cda9 | Not Translated (0%) | After learning of and reporting the transactions, SSBT modified its sanctions compliance program to screen retirement plan payments through its centralized screening system. | After learning of and reporting the transactions, SSBT modified its sanctions compliance program to screen retirement plan payments through its centralized screening system. |
| 16466988cf76-301f-4522-8052-bc38e0a0cda9 | Not Translated (0%) | Potential matches with a sanctions nexus are now handled through SSBT’s central alert dispositioning process with escalation protocols to its centralized sanctions compliance specialists. | Potential matches with a sanctions nexus are now handled through SSBT’s central alert dispositioning process with escalation protocols to its centralized sanctions compliance specialists. |
| 16478fd5b591-17c7-41b1-8968-b23a8e5ed6ae | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 1648c9e25f57-8f23-4b22-9a6c-634b2b98b565 | Not Translated (0%) | Organizations should ensure that policies and procedures are applicable to the entire organization in relation to sanctions compliance and that any deviations are understood and documented. | Organizations should ensure that policies and procedures are applicable to the entire organization in relation to sanctions compliance and that any deviations are understood and documented. |
| 1649af8e84f6-7a5c-495b-b798-f34f27ce2039 | Not Translated (0%) | Organizations should establish clear escalation procedures for sanctions issues to ensure they are reviewed and considered by appropriate personnel. | Organizations should establish clear escalation procedures for sanctions issues to ensure they are reviewed and considered by appropriate personnel. |
| 1650e72977b4-2361-4ba3-ba68-7ded8bce3175 | Not Translated (0%) | Organizations should consider hiring sanctions specialists, especially when their business is large and complex, instead of compliance generalists. | Organizations should consider hiring sanctions specialists, especially when their business is large and complex, instead of compliance generalists. |
| 1651f4b97fb1-7b12-4f57-bf74-4c80811f47a5 | Not Translated (0%) | Testing and Auditing | Testing and Auditing |
| 1652cb331198-819f-43c6-8408-0f6942514cfb | Not Translated (0%) | Audits assess the effectiveness of current processes and identify any inconsistencies between the policies and day-to-day operations. | Audits assess the effectiveness of current processes and identify any inconsistencies between the policies and day-to-day operations. |
| 1653cb331198-819f-43c6-8408-0f6942514cfb | Not Translated (0%) | Comprehensive and objective testing or audit function within a sanctions compliance program ensures that an organization can rectify any weaknesses or deficiencies that are identified. | Comprehensive and objective testing or audit function within a sanctions compliance program ensures that an organization can rectify any weaknesses or deficiencies that are identified. |
| 1654cb331198-819f-43c6-8408-0f6942514cfb | Not Translated (0%) | Necessary updates can include improving and/or recalibrating elements of the sanctions compliance program to account for any shifting risks or changes to the sanctions environment. | Necessary updates can include improving and/or recalibrating elements of the sanctions compliance program to account for any shifting risks or changes to the sanctions environment. |
| 1655cb331198-819f-43c6-8408-0f6942514cfb | Not Translated (0%) | Testing and auditing can be conducted on a specific element of a sanctions compliance program or at the enterprise-wide level. | Testing and auditing can be conducted on a specific element of a sanctions compliance program or at the enterprise-wide level. |
| 1656dd21428e-25af-42cc-9ac9-83a3fcfad0c4 | Not Translated (0%) | US Department of the Treasury, “OFAC Issues a Framework for Compliance Commitments,” May 2, 2019. | US Department of the Treasury, “OFAC Issues a Framework for Compliance Commitments,” May 2, 2019. |
| 1657749be0ec-69c8-48b5-9cf3-64e1f0c4f574 | Not Translated (0%) | Establishing your sanctions compliance program and putting it into motion is not enough. | Establishing your sanctions compliance program and putting it into motion is not enough. |
| 1658749be0ec-69c8-48b5-9cf3-64e1f0c4f574 | Not Translated (0%) | The program must then be monitored and evaluated. | The program must then be monitored and evaluated. |
| 1659749be0ec-69c8-48b5-9cf3-64e1f0c4f574 | Not Translated (0%) | Institutions should assess their compliance programs regularly to ensure their effectiveness and identify any new risk factors. | Institutions should assess their compliance programs regularly to ensure their effectiveness and identify any new risk factors. |
| 1660917aaa16-c592-4640-9dfa-6c555e3cee14 | Not Translated (0%) | The audit must be independent (i.e., performed by people who are not involved with the organization’s compliance staff), and the individuals who conduct the audit should report directly to the board of directors or a designated board committee that is composed primarily or completely of outside directors. | The audit must be independent (i.e., performed by people who are not involved with the organization’s compliance staff), and the individuals who conduct the audit should report directly to the board of directors or a designated board committee that is composed primarily or completely of outside directors. |
| 1661917aaa16-c592-4640-9dfa-6c555e3cee14 | Not Translated (0%) | Auditors must be sufficiently qualified to ensure that their findings and conclusions are reliable. | Auditors must be sufficiently qualified to ensure that their findings and conclusions are reliable. |
| 1662917aaa16-c592-4640-9dfa-6c555e3cee14 | Not Translated (0%) | Depending on the jurisdiction, the independent audit may also be referred to as the independent test or independent review. | Depending on the jurisdiction, the independent audit may also be referred to as the independent test or independent review. |
| 1663d11f0d41-415b-4578-bd8b-9922d765f6d4 | Not Translated (0%) | The independent audit should accomplish the following: | The independent audit should accomplish the following: |
| 1664f3aeb229-5605-4db2-93b0-72a41328b97f | Not Translated (0%) | Assess the overall integrity and effectiveness of the sanctions compliance program, including policies, procedures, and processes. | Assess the overall integrity and effectiveness of the sanctions compliance program, including policies, procedures, and processes. |
| 16659b8c0a08-611c-41ac-9c0d-a3d9a7fa3fce | Not Translated (0%) | Assess the adequacy of the sanctions compliance risk assessment. | Assess the adequacy of the sanctions compliance risk assessment. |
| 1666a680b836-b7a5-4b22-9e5a-1810c3c63419 | Not Translated (0%) | Examine the adequacy of sanctions due diligence policies, procedures, and processes, including whether they comply with regulatory requirements. | Examine the adequacy of sanctions due diligence policies, procedures, and processes, including whether they comply with regulatory requirements. |
| 1667b246b69d-4b01-4597-9c99-4069f9f4673e | Not Translated (0%) | Determine the level of personnel adherence to the institution’s sanctions compliance policies, procedures, and processes. | Determine the level of personnel adherence to the institution’s sanctions compliance policies, procedures, and processes. |
| 16685b6a9178-3360-467e-b176-26263a77c765 | Not Translated (0%) | Perform appropriate transaction testing, with particular emphasis on high-risk operations (products, services, customers, and geographic locations). | Perform appropriate transaction testing, with particular emphasis on high-risk operations (products, services, customers, and geographic locations). |
| 16697a32035a-fd9b-4772-8d78-e77141cba8ff | Not Translated (0%) | Assess training adequacy, including its comprehensiveness, accuracy of materials, training schedule, attendance tracking, and escalation procedures for lack of attendance. | Assess training adequacy, including its comprehensiveness, accuracy of materials, training schedule, attendance tracking, and escalation procedures for lack of attendance. |
| 167001fe77c1-1abf-46f5-89f2-219129b52a35 | Not Translated (0%) | Assess compliance with applicable sanctions regimes based on the jurisdictions in which the organization conducts business. | Assess compliance with applicable sanctions regimes based on the jurisdictions in which the organization conducts business. |
| 16713b991e43-06d6-4fab-8d6d-e80c050cc173 | Not Translated (0%) | Examine the integrity and accuracy of management information systems used in the compliance program. | Examine the integrity and accuracy of management information systems used in the compliance program. |
| 16723b991e43-06d6-4fab-8d6d-e80c050cc173 | Not Translated (0%) | This may include assessing the adequacy of the scope of any third-party independent system validations and the qualifications of parties engaged to perform such reviews. | This may include assessing the adequacy of the scope of any third-party independent system validations and the qualifications of parties engaged to perform such reviews. |
| 1673b00d8829-5308-4514-ae46-f478c5524e98 | Not Translated (0%) | Review all of the aspects of the sanctions compliance functions that have been outsourced to third parties, including the qualifications of the personnel, the contract, and the performance and reputation of the company. | Review all of the aspects of the sanctions compliance functions that have been outsourced to third parties, including the qualifications of the personnel, the contract, and the performance and reputation of the company. |
| 167450c9e366-33b7-4ef5-bcfd-1a725fe8ea34 | Not Translated (0%) | Evaluate the ability of sanctions screening/filtering software applications to identify unusual activity by: | Evaluate the ability of sanctions screening/filtering software applications to identify unusual activity by: |
| 167576347603-bd5c-4139-9042-eed75fddbe3a | Not Translated (0%) | Checking data records, including the names and other identifying information, against official sanctions lists and internal sanctions-related watchlists | Checking data records, including the names and other identifying information, against official sanctions lists and internal sanctions-related watchlists |
| 1676e0a407d5-86bb-4380-86da-a725f6b07916 | Not Translated (0%) | Reviewing policies, procedures, and processes for monitoring sanctions evasions | Reviewing policies, procedures, and processes for monitoring sanctions evasions |
| 1677ae60c67e-ab34-4aab-9a10-a7a0a02ef336 | Not Translated (0%) | Reviewing the processes for ensuring the completeness, accuracy, and timeliness of the data supplied by the source transaction processing systems | Reviewing the processes for ensuring the completeness, accuracy, and timeliness of the data supplied by the source transaction processing systems |
| 1678af010949-b649-46d9-9f72-92b6cd8986e6 | Not Translated (0%) | Evaluating the methodology for establishing and analyzing filtering criteria | Evaluating the methodology for establishing and analyzing filtering criteria |
| 1679bfa0ffeb-71f3-479b-adfc-200fd708586a | Not Translated (0%) | Evaluating the filtering matrix that provides the list of messages/payments that are subject to sanctions filtering | Evaluating the filtering matrix that provides the list of messages/payments that are subject to sanctions filtering |
| 1680f72887ba-fb23-4248-b290-8523e671ad73 | Not Translated (0%) | Review case and information management, including the: | Review case and information management, including the: |
| 1681910dba6d-10f2-4916-9d82-6c098b4e63b8 | Not Translated (0%) | Number of potential matches identified through screening and filtering within a defined period | Number of potential matches identified through screening and filtering within a defined period |
| 1682bc00a98f-265d-45f2-9498-3690cb108df7 | Not Translated (0%) | Number of false positives and true matches identified within a defined period | Number of false positives and true matches identified within a defined period |
| 1683559a2cde-bb2f-404b-b7a6-9c3d6957e96d | Not Translated (0%) | Number of transactions and payments that have been rejected or frozen as a result of sanctions compliance | Number of transactions and payments that have been rejected or frozen as a result of sanctions compliance |
| 16841d38e42e-7e88-464f-a629-38b25ac89158 | Not Translated (0%) | Details of updates to the screening tool that have been implemented | Details of updates to the screening tool that have been implemented |
| 168572893602-aaa2-4dc5-a452-6a30d621f4cd | Not Translated (0%) | Details of any external reporting to sanctions authorities | Details of any external reporting to sanctions authorities |
| 168660fb8b47-c909-4294-bdc7-728e36544aa6 | Not Translated (0%) | Assess the adequacy of record keeping and record-retention processes. | Assess the adequacy of record keeping and record-retention processes. |
| 168760fb8b47-c909-4294-bdc7-728e36544aa6 | Not Translated (0%) | This should include the: | This should include the: |
| 16881226e0e7-ffac-4dab-9a86-337e15aaa793 | Not Translated (0%) | Date and time of receipt of new/updated sanctions lists and updates to the screening tool | Date and time of receipt of new/updated sanctions lists and updates to the screening tool |
| 168978706535-c485-47a2-979c-c1759af69370 | Not Translated (0%) | Date and time at which new/updated sanctions lists were screened against the counterparties (and related parties, when relevant), vendors, transactions, and payments | Date and time at which new/updated sanctions lists were screened against the counterparties (and related parties, when relevant), vendors, transactions, and payments |
| 16906e846f29-96ab-4459-abb8-4b7496cc0b05 | Not Translated (0%) | Track previously identified deficiencies and ensure they were promptly corrected by management. | Track previously identified deficiencies and ensure they were promptly corrected by management. |
| 169149372eba-0ad9-4a65-957d-720d72babd59 | Not Translated (0%) | Note concerns related to the data quality of the incoming and outgoing payment messages, of the source systems, and of the screening and filtering tools, which can impact the reliability of sanctions controls and any mitigating actions. | Note concerns related to the data quality of the incoming and outgoing payment messages, of the source systems, and of the screening and filtering tools, which can impact the reliability of sanctions controls and any mitigating actions. |
| 169243a01813-d422-4428-a208-0bddac44b349 | Not Translated (0%) | Determine if the audit’s overall coverage and frequency is appropriate for the organization’s risk profile. | Determine if the audit’s overall coverage and frequency is appropriate for the organization’s risk profile. |
| 16937906f3ea-9da6-42ae-b0a3-2f53c723f96d | Not Translated (0%) | Ensure, in coordination with the board or designated board committee, that overall audit coverage and frequency are appropriate for the risk profile of the organization. | Ensure, in coordination with the board or designated board committee, that overall audit coverage and frequency are appropriate for the risk profile of the organization. |
| 169499ba413b-6a92-45b0-919f-14ea0c691b9e | Not Translated (0%) | Assess if the board of directors was responsive to previous audit findings. | Assess if the board of directors was responsive to previous audit findings. |
| 1695ee52caaa-b4b5-49a9-a950-7da851acfc13 | Not Translated (0%) | Determine the adequacy of the following, as they relate to the training program and materials: | Determine the adequacy of the following, as they relate to the training program and materials: |
| 16968eb56fdb-ebf1-4c58-84b1-905bc3c7744d | Not Translated (0%) | The importance that the board and senior management personnel place on ongoing education, training, and compliance | The importance that the board and senior management personnel place on ongoing education, training, and compliance |
| 169785cb1820-7f61-4745-b98b-2e91dac956ce | Not Translated (0%) | Employee accountability for ensuring sanctions compliance, including the employee performance management process | Employee accountability for ensuring sanctions compliance, including the employee performance management process |
| 16989461106b-934a-4a06-9c20-c228bdc31b7e | Not Translated (0%) | Comprehensiveness of training, related to the risk assessment of each individual business line | Comprehensiveness of training, related to the risk assessment of each individual business line |
| 1699b723ab88-ac0f-4724-841f-cdd7e5266887 | Not Translated (0%) | Training of personnel from all applicable areas of the institution | Training of personnel from all applicable areas of the institution |
| 1700e805d7be-b066-4ec5-b3dd-f4a511da9329 | Not Translated (0%) | Frequency of training, including the timeliness of training given to new and transferred employees | Frequency of training, including the timeliness of training given to new and transferred employees |
| 1701f26f8cbb-8c55-4f35-aa80-fb79fc9bc682 | Not Translated (0%) | Coverage of internal policies, procedures, processes, and new rules and regulations | Coverage of internal policies, procedures, processes, and new rules and regulations |
| 1702af5fae5a-5111-4ea6-9481-5487c2efb9c9 | Not Translated (0%) | Coverage of different forms of sanctions as they relate to identifying suspicious activity | Coverage of different forms of sanctions as they relate to identifying suspicious activity |
| 17033002fd49-2359-42d1-8ff6-2e6d8033daec | Not Translated (0%) | Disciplinary actions taken for noncompliance with internal policies and regulatory requirements | Disciplinary actions taken for noncompliance with internal policies and regulatory requirements |
| 17049334de02-3936-455f-96b0-98ede63704b8 | Not Translated (0%) | An effective internal audit department develops and maintains an audit risk assessment to determine audit priorities. | An effective internal audit department develops and maintains an audit risk assessment to determine audit priorities. |
| 17059334de02-3936-455f-96b0-98ede63704b8 | Not Translated (0%) | It also develops and maintains detailed audit testing programs for every area. | It also develops and maintains detailed audit testing programs for every area. |
| 17069334de02-3936-455f-96b0-98ede63704b8 | Not Translated (0%) | All audit and regulatory recommendations for corrective action must identify the target date for completion and the personnel responsible, and the audit department must track its progress. | All audit and regulatory recommendations for corrective action must identify the target date for completion and the personnel responsible, and the audit department must track its progress. |
| 17079334de02-3936-455f-96b0-98ede63704b8 | Not Translated (0%) | Regular status reports should be provided to senior management and the board of directors, as well as to supervisory authorities upon request. | Regular status reports should be provided to senior management and the board of directors, as well as to supervisory authorities upon request. |
| 17089334de02-3936-455f-96b0-98ede63704b8 | Not Translated (0%) | Failure to properly address audit issues is a frequent criticism in cases in which regulators levy fines on institutions. | Failure to properly address audit issues is a frequent criticism in cases in which regulators levy fines on institutions. |
| 1709553ba0e4-efb0-41d3-a96e-724c9c50797f | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 1710553ba0e4-efb0-41d3-a96e-724c9c50797f | Not Translated (0%) | UNICREDIT BANK AG, 2019 | UNICREDIT BANK AG, 2019 |
| 17112942c558-dc93-4d8f-8eef-8d42dfd9e287 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 1712c4caa4e7-335a-4820-85b4-94086f4a6cb1 | Not Translated (0%) | In 2019, UniCredit Bank AG, a financial institution headquartered in Munich, was fined by the US authorities for illegally moving hundreds of millions of dollars through the US financial system on behalf of sanctioned entities in restricted countries including Iran, Libya, and Cuba, and then working to cover its tracks to avoid detection. | In 2019, UniCredit Bank AG, a financial institution headquartered in Munich, was fined by the US authorities for illegally moving hundreds of millions of dollars through the US financial system on behalf of sanctioned entities in restricted countries including Iran, Libya, and Cuba, and then working to cover its tracks to avoid detection. |
| 1713c4caa4e7-335a-4820-85b4-94086f4a6cb1 | Not Translated (0%) | Regulators claimed that UniCredit Bank AG disguised transactions between 2002 and 2011, in part by stripping words such as Sudan and Tehran from payment messages to New York financial institutions. | Regulators claimed that UniCredit Bank AG disguised transactions between 2002 and 2011, in part by stripping words such as Sudan and Tehran from payment messages to New York financial institutions. |
| 1714c4caa4e7-335a-4820-85b4-94086f4a6cb1 | Not Translated (0%) | The settlements in this case related to apparent violations of sanctions targeting proliferators of weapons of mass destruction, global terrorism, and the countries of Iran, Myanmar, Cuba, Libya, Sudan, and Syria. | The settlements in this case related to apparent violations of sanctions targeting proliferators of weapons of mass destruction, global terrorism, and the countries of Iran, Myanmar, Cuba, Libya, Sudan, and Syria. |
| 1715991173f3-4421-411c-869a-d1d5f64dec0f | Not Translated (0%) | For a period of five years, beginning 180 days after the date the agreement was executed, a senior-level executive or manager of UniCredit Bank AG was required to submit a certification to OFAC confirming that UniCredit had implemented and continued to maintain the sanctions compliance measures as committed above. | For a period of five years, beginning 180 days after the date the agreement was executed, a senior-level executive or manager of UniCredit Bank AG was required to submit a certification to OFAC confirming that UniCredit had implemented and continued to maintain the sanctions compliance measures as committed above. |
| 171604f6edff-f8a6-4b37-9723-1bc4b0ae0880 | Not Translated (0%) | In addition to UniCredit Bank AG, 10 banks have been penalized by US and Manhattan authorities over the past decade for sanctions-related violations. | In addition to UniCredit Bank AG, 10 banks have been penalized by US and Manhattan authorities over the past decade for sanctions-related violations. |
| 171704f6edff-f8a6-4b37-9723-1bc4b0ae0880 | Not Translated (0%) | France’s BNP Paribas SA pleaded guilty in 2014 and paid a record $8.9 billion penalty. | France’s BNP Paribas SA pleaded guilty in 2014 and paid a record $8.9 billion penalty. |
| 171804f6edff-f8a6-4b37-9723-1bc4b0ae0880 | Not Translated (0%) | Other banks settled with much lower penalties and deferred prosecution agreements, including Amsterdam-based ING Bank, which paid $619 million in 2012, and Zurich-based Credit Suisse Group AG, which paid $536 million in 2009. | Other banks settled with much lower penalties and deferred prosecution agreements, including Amsterdam-based ING Bank, which paid $619 million in 2012, and Zurich-based Credit Suisse Group AG, which paid $536 million in 2009. |
| 171904f6edff-f8a6-4b37-9723-1bc4b0ae0880 | Not Translated (0%) | The Standard Chartered settlement was in addition to the $667 million the bank paid US authorities in 2012 and another $300 million penalty in 2014 related to surveillance shortcomings. | The Standard Chartered settlement was in addition to the $667 million the bank paid US authorities in 2012 and another $300 million penalty in 2014 related to surveillance shortcomings. |
| 1720ac8f0403-b5ff-4e07-8103-73d7e24fc573 | Not Translated (0%) | US Department of Justice, “UniCredit Bank AG Agrees to Plead Guilty for Illegally Processing Transactions in Violation of Iranian Sanctions,” April 15, 2019. | US Department of Justice, “UniCredit Bank AG Agrees to Plead Guilty for Illegally Processing Transactions in Violation of Iranian Sanctions,” April 15, 2019. |
| 1721b8a40496-a37d-47ae-8bfc-c9d681e80778 | Not Translated (0%) | , | , |
| 172286b19e99-7632-4121-8cbe-6d97d6a20dfc | Not Translated (0%) | Reuters, “Italy’s UniCredit to pay $1.3 billion to settle US sanctions probe,” April 15, 2019. | Reuters, “Italy’s UniCredit to pay $1.3 billion to settle US sanctions probe,” April 15, 2019. |
| 1723a1f288fb-79e1-4a0d-9ea8-ca2af78b84c2 | Not Translated (0%) | , | , |
| 1724b079c8eb-b140-4098-8458-51002c9dcfd8 | Not Translated (0%) | Bloomberg, “UniCredit to Pay $1.3 Billion in Biggest Iran Sanctions Fine,” April 16, 2019. | Bloomberg, “UniCredit to Pay $1.3 Billion in Biggest Iran Sanctions Fine,” April 16, 2019. |
| 17257907a714-eab0-4dfd-af8d-482cae92a337 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 17263ac1e5a8-022c-49c4-8033-d8d73b1eafbd | Not Translated (0%) | Organizations should consider recalibrating their transaction monitoring and risk assessment of payment messages to identify any attempts to cover up sanctions evasion efforts. | Organizations should consider recalibrating their transaction monitoring and risk assessment of payment messages to identify any attempts to cover up sanctions evasion efforts. |
| 172712deb3b8-79df-48f4-b2aa-e958cf31073a | Not Translated (0%) | Understanding sanctions evasion typologies can help organizations identify loopholes against which they can test their transactions. | Understanding sanctions evasion typologies can help organizations identify loopholes against which they can test their transactions. |
| 17286c74b633-e03d-4dc6-9207-294a8d86d0bd | Not Translated (0%) | Organizations should test against known and potential sanctions evasion measures. | Organizations should test against known and potential sanctions evasion measures. |
| 172994b7b9db-73e9-4d1f-8ab8-fe7ce35cf61a | Not Translated (0%) | Audit tests should be performed to assess of the soundness of a sanctions compliance program. | Audit tests should be performed to assess of the soundness of a sanctions compliance program. |
| 17304f900197-ff36-4cb2-bb7f-f330a441ad68 | Not Translated (0%) | Employee Training | Employee Training |
| 173115af407e-28cc-47bc-b401-d43492c32e09 | Not Translated (0%) | An effective training program is an integral component of a successful sanctions compliance program. | An effective training program is an integral component of a successful sanctions compliance program. |
| 173215af407e-28cc-47bc-b401-d43492c32e09 | Not Translated (0%) | The training program should be provided to all appropriate employees and personnel on a periodic basis (and at a minimum, annually) and generally should accomplish the following: | The training program should be provided to all appropriate employees and personnel on a periodic basis (and at a minimum, annually) and generally should accomplish the following: |
| 1733ce5a7a46-0555-4055-90f3-3f09404693b6 | Not Translated (0%) | Provide job-specific knowledge based on need. | Provide job-specific knowledge based on need. |
| 17346a08b68c-6875-4e70-a939-615fef6cd335 | Not Translated (0%) | Communicate the sanctions compliance responsibilities for each employee. | Communicate the sanctions compliance responsibilities for each employee. |
| 17351b4169d3-ac76-4ebf-a0b2-5b32044d4789 | Not Translated (0%) | Hold employees accountable for sanctions compliance training through assessments. | Hold employees accountable for sanctions compliance training through assessments. |
| 17368ba1dc8c-d82e-4011-be8e-b51f259d0b41 | Not Translated (0%) | Most AML/CFT and sanctions compliance laws and regulations require financial institutions to include training of appropriate and relevant employees as part of their formalized compliance programs. | Most AML/CFT and sanctions compliance laws and regulations require financial institutions to include training of appropriate and relevant employees as part of their formalized compliance programs. |
| 17378ba1dc8c-d82e-4011-be8e-b51f259d0b41 | Not Translated (0%) | In fact, training is one of the most important ways to stress the importance of compliance efforts and to educate employees about what actions to take when they encounter potential sanctions violations. | In fact, training is one of the most important ways to stress the importance of compliance efforts and to educate employees about what actions to take when they encounter potential sanctions violations. |
| 17388ba1dc8c-d82e-4011-be8e-b51f259d0b41 | Not Translated (0%) | Training also serves as an important control in the mitigation of sanctions compliance risks to which the financial institution may be exposed. | Training also serves as an important control in the mitigation of sanctions compliance risks to which the financial institution may be exposed. |
| 1739f025c7d1-d83c-471b-87ef-210b83a4eb3d | Not Translated (0%) | COMPONENTS OF AN EFFECTIVE TRAINING PROGRAM | COMPONENTS OF AN EFFECTIVE TRAINING PROGRAM |
| 174029c01838-f059-47cd-8d3a-a985f978f751 | Not Translated (0%) | An effective training program should explain the relevant sanctions laws and regulatory expectations and cover the institution’s policies and procedures used to mitigate sanctions compliance risks. | An effective training program should explain the relevant sanctions laws and regulatory expectations and cover the institution’s policies and procedures used to mitigate sanctions compliance risks. |
| 174129c01838-f059-47cd-8d3a-a985f978f751 | Not Translated (0%) | In this section, the term “training” will include both formal training courses and ongoing communications—emails, newsletters, periodic team meetings, intranet sites, and other means that facilitate the sharing of information—that serve to educate employees and maintain their awareness of sanctions compliance requirements. | In this section, the term “training” will include both formal training courses and ongoing communications—emails, newsletters, periodic team meetings, intranet sites, and other means that facilitate the sharing of information—that serve to educate employees and maintain their awareness of sanctions compliance requirements. |
| 174229c01838-f059-47cd-8d3a-a985f978f751 | Not Translated (0%) | Below is an outline of who should receive sanctions compliance training, the topics that should form the basis of that training, and how, when, and where that training should be delivered. | Below is an outline of who should receive sanctions compliance training, the topics that should form the basis of that training, and how, when, and where that training should be delivered. |
| 17433973e127-5922-45fc-b46e-c99639e85894 | Not Translated (0%) | IDENTIFYING THE TARGET AUDIENCE | IDENTIFYING THE TARGET AUDIENCE |
| 17440e9be95b-a11b-4552-9c8d-48f4423fdb1e | Not Translated (0%) | The first step in designing an effective training program is to identify the target audience. | The first step in designing an effective training program is to identify the target audience. |
| 17450e9be95b-a11b-4552-9c8d-48f4423fdb1e | Not Translated (0%) | Most areas of the financial institution should receive AML/CFT training, and additional personnel need sanctions compliance training as well. | Most areas of the financial institution should receive AML/CFT training, and additional personnel need sanctions compliance training as well. |
| 17460e9be95b-a11b-4552-9c8d-48f4423fdb1e | Not Translated (0%) | In some countries, training programs must extend beyond full-time and part-time employees to include contractors, consultants, interns, apprentice placements, and/or secondees (colleagues from other offices, branches, or subsidiaries). | In some countries, training programs must extend beyond full-time and part-time employees to include contractors, consultants, interns, apprentice placements, and/or secondees (colleagues from other offices, branches, or subsidiaries). |
| 17470e9be95b-a11b-4552-9c8d-48f4423fdb1e | Not Translated (0%) | Each segment should be trained on sanctions compliance topics and other issues that are relevant to their activities. | Each segment should be trained on sanctions compliance topics and other issues that are relevant to their activities. |
| 17480e9be95b-a11b-4552-9c8d-48f4423fdb1e | Not Translated (0%) | The following list outlines groups of employees who may be appropriate training targets, depending on the specific institution and scope of training: | The following list outlines groups of employees who may be appropriate training targets, depending on the specific institution and scope of training: |
| 1749fb456ff5-686d-4b3b-bca7-bafbe58f9e9d | Not Translated (0%) | Customer-facing staff: | Customer-facing staff: |
| 1750fb456ff5-686d-4b3b-bca7-bafbe58f9e9d | Not Translated (0%) | As the financial institution’s first line of defense, customer-facing staff members are the employees who need the deepest practical understanding of why AML/CFT and sanctions compliance efforts are important and in what ways they need to be vigilant against sanctions evasion. | As the financial institution’s first line of defense, customer-facing staff members are the employees who need the deepest practical understanding of why AML/CFT and sanctions compliance efforts are important and in what ways they need to be vigilant against sanctions evasion. |
| 1751fb456ff5-686d-4b3b-bca7-bafbe58f9e9d | Not Translated (0%) | Although a general course will often be sufficient to address the importance of sanctions compliance, additional training on specific unit procedures related to the products and services carried out by the business line is often needed. | Although a general course will often be sufficient to address the importance of sanctions compliance, additional training on specific unit procedures related to the products and services carried out by the business line is often needed. |
| 1752fb456ff5-686d-4b3b-bca7-bafbe58f9e9d | Not Translated (0%) | For example, credit and loan-operations staff members require training on how sanctions evaders can misuse credit products, how the staff can recognize potential money laundering, and what actions the staff should take when they suspect these activities. | For example, credit and loan-operations staff members require training on how sanctions evaders can misuse credit products, how the staff can recognize potential money laundering, and what actions the staff should take when they suspect these activities. |
| 1753fb456ff5-686d-4b3b-bca7-bafbe58f9e9d | Not Translated (0%) | Employees establishing loans and accounts for new customers need to know applicable regulatory requirements and the institution’s policies and procedures for identification and performing due diligence during the onboarding process. | Employees establishing loans and accounts for new customers need to know applicable regulatory requirements and the institution’s policies and procedures for identification and performing due diligence during the onboarding process. |
| 1754c39ed836-0f79-4fe5-9520-9f0d076290a5 | Not Translated (0%) | Operations personnel: | Operations personnel: |
| 1755c39ed836-0f79-4fe5-9520-9f0d076290a5 | Not Translated (0%) | Non-customer-facing personnel within an organization’s lines of business are also included in the first line of defense and should be provided with specialized training. | Non-customer-facing personnel within an organization’s lines of business are also included in the first line of defense and should be provided with specialized training. |
| 1756c39ed836-0f79-4fe5-9520-9f0d076290a5 | Not Translated (0%) | For example, cash vault, wire transfer, trade finance, loan underwriter, loan collections, and treasury management personnel are often in positions to recognize illegal, fraudulent, and/or unusual account activity. | For example, cash vault, wire transfer, trade finance, loan underwriter, loan collections, and treasury management personnel are often in positions to recognize illegal, fraudulent, and/or unusual account activity. |
| 1757c39ed836-0f79-4fe5-9520-9f0d076290a5 | Not Translated (0%) | Specialized training for these individuals to recognize sanctions compliance red flags and to elevate unusual activity to compliance personnel should be considered. | Specialized training for these individuals to recognize sanctions compliance red flags and to elevate unusual activity to compliance personnel should be considered. |
| 17587542c29b-f828-4934-9d47-d8b292340f08 | Not Translated (0%) | Sanctions compliance staff: | Sanctions compliance staff: |
| 17597542c29b-f828-4934-9d47-d8b292340f08 | Not Translated (0%) | Under the direction of a designated compliance officer, the sanctions compliance staff members coordinate and monitor the organization’s day-to-day compliance program in the second line of defense. | Under the direction of a designated compliance officer, the sanctions compliance staff members coordinate and monitor the organization’s day-to-day compliance program in the second line of defense. |
| 17607542c29b-f828-4934-9d47-d8b292340f08 | Not Translated (0%) | Given this area’s responsibility for managing the organization’s adherence to sanctions regulations, more advanced, ongoing training to stay abreast of requirements and emerging trends is important. | Given this area’s responsibility for managing the organization’s adherence to sanctions regulations, more advanced, ongoing training to stay abreast of requirements and emerging trends is important. |
| 17617542c29b-f828-4934-9d47-d8b292340f08 | Not Translated (0%) | Often, this additional training involves attending conferences and sanctions compliance presentations that are more robust in nature. | Often, this additional training involves attending conferences and sanctions compliance presentations that are more robust in nature. |
| 1762c9a5ff73-a36d-4072-94b0-b399aa966de8 | Not Translated (0%) | Independent testing staff: | Independent testing staff: |
| 1763c9a5ff73-a36d-4072-94b0-b399aa966de8 | Not Translated (0%) | Independent testing personnel are the organization’s third line of defense. | Independent testing personnel are the organization’s third line of defense. |
| 1764c9a5ff73-a36d-4072-94b0-b399aa966de8 | Not Translated (0%) | Because this functional area independently assesses the adequacy of the sanctions compliance program, these employees should receive periodic training concerning regulatory requirements, changes in regulation, sanctions evasion methods, sanctions enforcement, and their impact on the organization. | Because this functional area independently assesses the adequacy of the sanctions compliance program, these employees should receive periodic training concerning regulatory requirements, changes in regulation, sanctions evasion methods, sanctions enforcement, and their impact on the organization. |
| 176535b49b2e-f498-46e7-9d9b-4649d5857ee9 | Not Translated (0%) | Senior management and board of directors: | Senior management and board of directors: |
| 176635b49b2e-f498-46e7-9d9b-4649d5857ee9 | Not Translated (0%) | The board and senior management do not need the same degree of training as personnel in the first, second, or third lines of defense. | The board and senior management do not need the same degree of training as personnel in the first, second, or third lines of defense. |
| 176735b49b2e-f498-46e7-9d9b-4649d5857ee9 | Not Translated (0%) | Specialized training for the organization’s leadership should address the importance of sanctions compliance regulatory requirements, the penalties for noncompliance, the potential for personal liability, and the organization’s unique risks. | Specialized training for the organization’s leadership should address the importance of sanctions compliance regulatory requirements, the penalties for noncompliance, the potential for personal liability, and the organization’s unique risks. |
| 176835b49b2e-f498-46e7-9d9b-4649d5857ee9 | Not Translated (0%) | Without a general understanding of this information, these leaders cannot adequately provide for compliance oversight, approve relevant policies, or provide sufficient resources. | Without a general understanding of this information, these leaders cannot adequately provide for compliance oversight, approve relevant policies, or provide sufficient resources. |
| 1769aafcffba-f41c-4938-af0a-ad144c539f31 | Not Translated (0%) | TRAINING TOPICS | TRAINING TOPICS |
| 17701dded895-6754-4bd7-9807-681a2a00c96b | Not Translated (0%) | Although the appropriate training topics will vary according to the institution and the specific products and services it offers, several basic matters should be factored into sanctions compliance training: | Although the appropriate training topics will vary according to the institution and the specific products and services it offers, several basic matters should be factored into sanctions compliance training: |
| 1771d5a3cb1c-20d2-4bf4-9e44-5852770e4d11 | Not Translated (0%) | General background and history pertaining to sanctions, such as sanction types, evasion tactics, and consequences of noncompliance | General background and history pertaining to sanctions, such as sanction types, evasion tactics, and consequences of noncompliance |
| 177263da041c-0068-4623-ba14-87d31b8ad0f0 | Not Translated (0%) | Legal framework of what sanctions laws apply to institutions and their employees | Legal framework of what sanctions laws apply to institutions and their employees |
| 17734a7c2109-a00e-485d-93ed-8f4d24ca1f5c | Not Translated (0%) | Penalties for sanctions noncompliance, including criminal and civil penalties, fines, jail terms, and internal sanctions (e.g., disciplinary action up to and including termination of employment) | Penalties for sanctions noncompliance, including criminal and civil penalties, fines, jail terms, and internal sanctions (e.g., disciplinary action up to and including termination of employment) |
| 17745c51bbcc-ad7b-4b1b-8ba4-3e249ecdf29d | Not Translated (0%) | Internal policies and procedures, including customer due diligence, enhanced due diligence, ongoing due diligence, and any additional sanctions-relevant policy elements | Internal policies and procedures, including customer due diligence, enhanced due diligence, ongoing due diligence, and any additional sanctions-relevant policy elements |
| 17752ef8a520-1df1-41a6-8f00-dc5e6b1a227c | Not Translated (0%) | Review of the internal sanctions risk assessments | Review of the internal sanctions risk assessments |
| 1776f861ce1d-e26c-4879-9003-424a061fc891 | Not Translated (0%) | Legal record-keeping requirements | Legal record-keeping requirements |
| 177777121a4c-f321-4f7f-a488-0c0d0ae95f93 | Not Translated (0%) | Sanctions filtering and blocking requirements | Sanctions filtering and blocking requirements |
| 1778a29fcfc8-92ba-43f4-b6aa-f00975c6aec5 | Not Translated (0%) | Reporting requirements | Reporting requirements |
| 17790eabce59-5235-4bb0-a8a9-9ee65b471fee | Not Translated (0%) | How to react when faced with a suspicious customer or transaction | How to react when faced with a suspicious customer or transaction |
| 17802c53c2d8-0929-4d6a-b026-03b9cb2d4ec3 | Not Translated (0%) | How to respond to customers who attempt to circumvent reporting requirements | How to respond to customers who attempt to circumvent reporting requirements |
| 1781cc20d470-8701-4263-b64e-4a933dd5b9e7 | Not Translated (0%) | Duties and accountability of employees | Duties and accountability of employees |
| 17829aadd77e-16c3-4e12-b969-634b40cbb171 | Not Translated (0%) | Nature of products and services offered, how they work, and their associated red flags | Nature of products and services offered, how they work, and their associated red flags |
| 17832d93ebb7-126f-4eb1-ab5c-e4277119665d | Not Translated (0%) | Maintaining confidentiality with sanctions compliance matters, especially if subsequent AML investigations may arise | Maintaining confidentiality with sanctions compliance matters, especially if subsequent AML investigations may arise |
| 1784c3e5c651-b2c0-49ca-8208-7210522602be | Not Translated (0%) | Sanctions trends and emerging issues related to criminal activity, terrorist financing, and regulatory requirements | Sanctions trends and emerging issues related to criminal activity, terrorist financing, and regulatory requirements |
| 178527cd594c-9228-44df-a59d-f24df83f7d39 | Not Translated (0%) | Real-life sanctions evasion schemes (preferably cases that have occurred at the institution or at similar institutions), including how the pattern of activity was first detected, its impact on the institution, and its ultimate resolution | Real-life sanctions evasion schemes (preferably cases that have occurred at the institution or at similar institutions), including how the pattern of activity was first detected, its impact on the institution, and its ultimate resolution |
| 1786a9fb102b-dc4e-4463-ba85-0ef05c9f22f4 | Not Translated (0%) | The individuals who are responsible for designing the training program must identify which of the above topics relate to the target audience. | The individuals who are responsible for designing the training program must identify which of the above topics relate to the target audience. |
| 1787a9fb102b-dc4e-4463-ba85-0ef05c9f22f4 | Not Translated (0%) | Trainers typically are a mixture of people within the organization and external experts. | Trainers typically are a mixture of people within the organization and external experts. |
| 1788a9fb102b-dc4e-4463-ba85-0ef05c9f22f4 | Not Translated (0%) | The training is usually provided face-to-face for senior members and executives, and either in person (in the form of a workshop) or online for other members of the organization. | The training is usually provided face-to-face for senior members and executives, and either in person (in the form of a workshop) or online for other members of the organization. |
| 178976d01a96-05b6-4f7c-b497-56a5f09ea92b | Not Translated (0%) | TRAINING METHODS | TRAINING METHODS |
| 17905b2c0c76-7e8a-44c4-b651-432d465f40f0 | Not Translated (0%) | The following are selected steps that trainers can take to develop an effective training program: | The following are selected steps that trainers can take to develop an effective training program: |
| 1791a073be16-14d0-4e43-807a-25172e4345ac | Not Translated (0%) | Identify the issues that need to be communicated and decide how best to disseminate the message. | Identify the issues that need to be communicated and decide how best to disseminate the message. |
| 1792a073be16-14d0-4e43-807a-25172e4345ac | Not Translated (0%) | A memo or email may accomplish what is needed without formal, in-person training. | A memo or email may accomplish what is needed without formal, in-person training. |
| 1793a073be16-14d0-4e43-807a-25172e4345ac | Not Translated (0%) | Sometimes, e-learning can efficiently do the job, whereas in other cases, in-person training is the most appropriate option. | Sometimes, e-learning can efficiently do the job, whereas in other cases, in-person training is the most appropriate option. |
| 179431f954c2-7798-4af0-931f-b0b8e37fe632 | Not Translated (0%) | Identify the audience by functional area as well as by level of employee/management. | Identify the audience by functional area as well as by level of employee/management. |
| 179531f954c2-7798-4af0-931f-b0b8e37fe632 | Not Translated (0%) | New hires should also receive training that is different from that provided to veteran employees. | New hires should also receive training that is different from that provided to veteran employees. |
| 17968da516b6-aa01-4161-9dfa-c20d57caff38 | Not Translated (0%) | Determine the specific issues to be addressed, such as issues uncovered by audits or regulatory exams, or changes to systems, products, or regulations. | Determine the specific issues to be addressed, such as issues uncovered by audits or regulatory exams, or changes to systems, products, or regulations. |
| 17971db196ce-385c-4e11-bf96-54bec026cb54 | Not Translated (0%) | Determine who can best develop and present the training program. | Determine who can best develop and present the training program. |
| 179859d12b1a-53bd-49de-933d-6b4e962f1251 | Not Translated (0%) | When decentralized training is planned (e.g., across large branch networks), determine if Train the Trainer sessions (sessions that teach potential instructors) are necessary. | When decentralized training is planned (e.g., across large branch networks), determine if Train the Trainer sessions (sessions that teach potential instructors) are necessary. |
| 1799a12a4873-220f-47f7-af5b-ae601cfc4917 | Not Translated (0%) | Create a course abstract or curriculum that addresses course goals, objectives, and desired outcomes. | Create a course abstract or curriculum that addresses course goals, objectives, and desired outcomes. |
| 1800a12a4873-220f-47f7-af5b-ae601cfc4917 | Not Translated (0%) | Identify who the audience should be and how the material will be presented. | Identify who the audience should be and how the material will be presented. |
| 1801c67db724-16ed-4e3a-9719-0a563863d010 | Not Translated (0%) | Establish a training calendar that identifies the topics and frequency of each course session. | Establish a training calendar that identifies the topics and frequency of each course session. |
| 1802955206ab-af87-479b-b783-c069c1a7efaf | Not Translated (0%) | Consider whether handouts would be helpful to reinforce the message of the training and serve as a reference tool after training has concluded. | Consider whether handouts would be helpful to reinforce the message of the training and serve as a reference tool after training has concluded. |
| 18037433d907-7446-4c30-bd31-aa905f2376a1 | Not Translated (0%) | Consider tests as a means to evaluate how well the training was understood, and implement a mandatory passing score. | Consider tests as a means to evaluate how well the training was understood, and implement a mandatory passing score. |
| 18047433d907-7446-4c30-bd31-aa905f2376a1 | Not Translated (0%) | Retain scores for future reference. | Retain scores for future reference. |
| 1805134a13ae-9833-4d32-af1b-cfb2d0f6766a | Not Translated (0%) | Consider using case studies in the training to illustrate points and emphasize the practical application of the course content. | Consider using case studies in the training to illustrate points and emphasize the practical application of the course content. |
| 180663284863-64a9-4b88-a67c-adb92330c8f2 | Not Translated (0%) | Include time for discussion. | Include time for discussion. |
| 1807c66c2dfd-1059-4e0a-9092-9b9feb9f3cdf | Not Translated (0%) | Consider the audience’s attention span, and plan to teach small, easy-to-digest, easy-to-categorize issues. | Consider the audience’s attention span, and plan to teach small, easy-to-digest, easy-to-categorize issues. |
| 18085eaac8ad-1a98-40ff-b3c8-77e0785d2165 | Not Translated (0%) | Track attendance. | Track attendance. |
| 18095eaac8ad-1a98-40ff-b3c8-77e0785d2165 | Not Translated (0%) | Ask attendees to sign in for each session, and issue reminders if make-up sessions are needed. | Ask attendees to sign in for each session, and issue reminders if make-up sessions are needed. |
| 18105eaac8ad-1a98-40ff-b3c8-77e0785d2165 | Not Translated (0%) | Unexcused absences may warrant disciplinary action and notation in employee personnel files. | Unexcused absences may warrant disciplinary action and notation in employee personnel files. |
| 1811fb0590a7-e9e5-4d73-aa82-8171586ded23 | Not Translated (0%) | TRAINING TIMING AND LOCATIONS | TRAINING TIMING AND LOCATIONS |
| 181207e9a673-3c4f-4e5b-8d81-e8370d4db6d4 | Not Translated (0%) | An institution’s training should be ongoing and on a regular schedule. | An institution’s training should be ongoing and on a regular schedule. |
| 181307e9a673-3c4f-4e5b-8d81-e8370d4db6d4 | Not Translated (0%) | Existing employees should at least attend an annual training session, and new employees should receive appropriate training with respect to their job function and within a reasonable period after joining or transferring to a new job. | Existing employees should at least attend an annual training session, and new employees should receive appropriate training with respect to their job function and within a reasonable period after joining or transferring to a new job. |
| 181486f687f2-b0b9-481b-beea-74dea45e4f7d | Not Translated (0%) | Situations may arise that demand an immediate session. | Situations may arise that demand an immediate session. |
| 181586f687f2-b0b9-481b-beea-74dea45e4f7d | Not Translated (0%) | For example, an emergency training session may be necessary after an examination or audit that uncovers sanctions compliance deficiencies. | For example, an emergency training session may be necessary after an examination or audit that uncovers sanctions compliance deficiencies. |
| 181686f687f2-b0b9-481b-beea-74dea45e4f7d | Not Translated (0%) | A news story that names the institution or a recent regulatory action, such as a consent order, could also prompt immediate additional training. | A news story that names the institution or a recent regulatory action, such as a consent order, could also prompt immediate additional training. |
| 181786f687f2-b0b9-481b-beea-74dea45e4f7d | Not Translated (0%) | Changes in software, systems, policies, procedures, and regulations are additional triggers for training sessions. | Changes in software, systems, policies, procedures, and regulations are additional triggers for training sessions. |
| 1818a65ea69d-8cad-49d1-b224-9b16b7f08ef9 | Not Translated (0%) | Some institutions have training centers that allow trainees to escape the distractions of daily work activity and focus on learning new information. | Some institutions have training centers that allow trainees to escape the distractions of daily work activity and focus on learning new information. |
| 1819a65ea69d-8cad-49d1-b224-9b16b7f08ef9 | Not Translated (0%) | Some types of training, such as the evaluation of a sanctions evasion case example, are more effective when conducted in small groups. | Some types of training, such as the evaluation of a sanctions evasion case example, are more effective when conducted in small groups. |
| 1820a65ea69d-8cad-49d1-b224-9b16b7f08ef9 | Not Translated (0%) | Role-playing exercises, which may be used to complement a prepared lecture or panel discussion, are also more effective in small groups. | Role-playing exercises, which may be used to complement a prepared lecture or panel discussion, are also more effective in small groups. |
| 1821a65ea69d-8cad-49d1-b224-9b16b7f08ef9 | Not Translated (0%) | These training sessions can be held anywhere. | These training sessions can be held anywhere. |
| 1822a65ea69d-8cad-49d1-b224-9b16b7f08ef9 | Not Translated (0%) | Large groups can be trained using computer-based training courses, which can be designed to automatically record attendance and test attendees (with a required minimum score to demonstrate understanding of the material). | Large groups can be trained using computer-based training courses, which can be designed to automatically record attendance and test attendees (with a required minimum score to demonstrate understanding of the material). |
| 182346355646-bbfb-42d1-9a4f-e7c8feb28f49 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 182446355646-bbfb-42d1-9a4f-e7c8feb28f49 | Not Translated (0%) | STANDARD CHARTERED BANK, 2019 | STANDARD CHARTERED BANK, 2019 |
| 1825795fb5e5-d815-4451-b2a2-172f07f9a6b2 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 1826933e051f-e63a-409a-8ee2-f7a61dfd27cb | Not Translated (0%) | Federal and state authorities in the United States and United Kingdom levied a $1.1 billion penalty against Standard Chartered Bank (StanChart), one of London’s largest banks, for engaging in thousands of illicit transactions worth hundreds of millions of dollars involving blacklisted countries such as Iran, Sudan, and Syria. | Federal and state authorities in the United States and United Kingdom levied a $1.1 billion penalty against Standard Chartered Bank (StanChart), one of London’s largest banks, for engaging in thousands of illicit transactions worth hundreds of millions of dollars involving blacklisted countries such as Iran, Sudan, and Syria. |
| 1827933e051f-e63a-409a-8ee2-f7a61dfd27cb | Not Translated (0%) | This was a rare global settlement for financial crime compliance failures. | This was a rare global settlement for financial crime compliance failures. |
| 1828d0c97351-5e48-4b87-8d71-92a3acc1dd20 | Not Translated (0%) | The US Department of Justice (DOJ), the US treasury’s Office of Foreign Assets Control (OFAC), the New York State Department of Financial Services (NYDFS), the United Kingdom’s (UK) Financial Conduct Authority (FCA), and other federal investigative and regulatory agencies issued the penalty against StanChart for years of violating US sanctions policies and essentially breaching a prior deferred prosecution agreement. | The US Department of Justice (DOJ), the US treasury’s Office of Foreign Assets Control (OFAC), the New York State Department of Financial Services (NYDFS), the United Kingdom’s (UK) Financial Conduct Authority (FCA), and other federal investigative and regulatory agencies issued the penalty against StanChart for years of violating US sanctions policies and essentially breaching a prior deferred prosecution agreement. |
| 1829d32491ae-85ad-4e84-b1d7-bd0984838e6b | Not Translated (0%) | The department’s investigation further uncovered that the bank’s compliance infrastructure in the UAE region “was woefully inadequate…. | The department’s investigation further uncovered that the bank’s compliance infrastructure in the UAE region “was woefully inadequate…. |
| 1830d32491ae-85ad-4e84-b1d7-bd0984838e6b | Not Translated (0%) | Compliance staff was poorly trained and unconcerned with US sanctions regulations.” | Compliance staff was poorly trained and unconcerned with US sanctions regulations.” |
| 1831d32491ae-85ad-4e84-b1d7-bd0984838e6b | Not Translated (0%) | Additionally, OFAC found “SCB’s compliance program … suffered from multiple systemic deficiencies, including failure to respond to warning signs in a timely and inefficient manner.” | Additionally, OFAC found “SCB’s compliance program … suffered from multiple systemic deficiencies, including failure to respond to warning signs in a timely and inefficient manner.” |
| 18320b176f42-abe3-465a-a301-7d7002389b44 | Not Translated (0%) | US Department of the Treasury, Enforcement Information for April 9, 2019. | US Department of the Treasury, Enforcement Information for April 9, 2019. |
| 18334a9fc821-bc31-4de1-b5d9-2471bcc9b7d5 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 1834624f7f38-4f94-4ac9-98c5-39d9c3f4133c | Not Translated (0%) | Organizations should strengthen policies and procedures to dismantle systemic deficiencies in their sanctions compliance program. | Organizations should strengthen policies and procedures to dismantle systemic deficiencies in their sanctions compliance program. |
| 18350d9d5347-9979-4da1-8799-0be9dd4ff983 | Not Translated (0%) | Organizations should ensure that training is provided to all staff so that they understand the dynamics of sanctions and recognize sanctions evasion tactics. | Organizations should ensure that training is provided to all staff so that they understand the dynamics of sanctions and recognize sanctions evasion tactics. |
| 1836174ceee9-338f-4873-bfb6-1f77dfc78742 | Not Translated (0%) | Senior management must stay aware of risk exposure, as it can severely impact the business. | Senior management must stay aware of risk exposure, as it can severely impact the business. |
| 1837174ceee9-338f-4873-bfb6-1f77dfc78742 | Not Translated (0%) | Whenever possible, senior management should engage in tailored face-to-face sanctions training. | Whenever possible, senior management should engage in tailored face-to-face sanctions training. |
| 18382cfd25ce-dc75-476f-b2ff-9bea19ff9a17 | Not Translated (0%) | Sanctions Evasion Techniques | Sanctions Evasion Techniques |
| 1839d1b43988-4a31-46e5-bd37-850e6b3d135a | Not Translated (0%) | Evasion Methods: | Evasion Methods: |
| 1840d1b43988-4a31-46e5-bd37-850e6b3d135a | Not Translated (0%) | Common Techniques | Common Techniques |
| 18415c03430c-82fe-45de-9836-3e4b313316d9 | Not Translated (0%) | Sanctions evasion is the deliberate act of avoiding or circumventing sanctions to engage in prohibited activity without being caught. | Sanctions evasion is the deliberate act of avoiding or circumventing sanctions to engage in prohibited activity without being caught. |
| 18425c03430c-82fe-45de-9836-3e4b313316d9 | Not Translated (0%) | For financial institutions, this includes attempting to remove or conceal the involvement of sanctioned places, entities, or individuals in a transaction or series of transactions with which it is involved. | For financial institutions, this includes attempting to remove or conceal the involvement of sanctioned places, entities, or individuals in a transaction or series of transactions with which it is involved. |
| 18435c03430c-82fe-45de-9836-3e4b313316d9 | Not Translated (0%) | When sanctions evasion is successful, a business that would have been flagged, required a license, restricted, or prohibited is otherwise allowed to proceed unhindered. | When sanctions evasion is successful, a business that would have been flagged, required a license, restricted, or prohibited is otherwise allowed to proceed unhindered. |
| 18441f2fb42b-3b1e-437d-9a0b-2c506e52ee11 | Not Translated (0%) | Who is behind sanctions evasion? | Who is behind sanctions evasion? |
| 18451f2fb42b-3b1e-437d-9a0b-2c506e52ee11 | Not Translated (0%) | Direct participants to a transaction can arrange evasion. | Direct participants to a transaction can arrange evasion. |
| 18461f2fb42b-3b1e-437d-9a0b-2c506e52ee11 | Not Translated (0%) | These sanctions evaders often know about due diligence, filters, and name screening. | These sanctions evaders often know about due diligence, filters, and name screening. |
| 18471f2fb42b-3b1e-437d-9a0b-2c506e52ee11 | Not Translated (0%) | They understand the regulatory requirements and spend time and resources learning how to break the rules without detection. | They understand the regulatory requirements and spend time and resources learning how to break the rules without detection. |
| 18481f2fb42b-3b1e-437d-9a0b-2c506e52ee11 | Not Translated (0%) | Financial institutions, manufacturing, packaging, and shipping companies can be complicit and sometimes help make these arrangements. | Financial institutions, manufacturing, packaging, and shipping companies can be complicit and sometimes help make these arrangements. |
| 1849ff3410a0-260e-4305-8add-1dad70f5a3d7 | Not Translated (0%) | Customer Relationships | Customer Relationships |
| 18504cf5d42b-a8eb-400b-8b2b-8870e627f562 | Not Translated (0%) | The customer relationship should be the primary defense against sanctions evasion. | The customer relationship should be the primary defense against sanctions evasion. |
| 18514cf5d42b-a8eb-400b-8b2b-8870e627f562 | Not Translated (0%) | A customer relationship encompasses any and all contact with a prospective customer. | A customer relationship encompasses any and all contact with a prospective customer. |
| 18524cf5d42b-a8eb-400b-8b2b-8870e627f562 | Not Translated (0%) | This contact includes the dialogue that takes place during onboarding and conversations that occur as a customer uses an organization’s products and services. | This contact includes the dialogue that takes place during onboarding and conversations that occur as a customer uses an organization’s products and services. |
| 18534cf5d42b-a8eb-400b-8b2b-8870e627f562 | Not Translated (0%) | People in the management, marketing, operations, and compliance departments may take part in this communication. | People in the management, marketing, operations, and compliance departments may take part in this communication. |
| 1854f69eea6c-b19a-4c45-9e68-f3ca30082843 | Not Translated (0%) | It is important to fully understand the nature of a customer, the businesses the customer is engaged in, the structure of the company and the individuals behind it, and where and with whom it does business. | It is important to fully understand the nature of a customer, the businesses the customer is engaged in, the structure of the company and the individuals behind it, and where and with whom it does business. |
| 1855f69eea6c-b19a-4c45-9e68-f3ca30082843 | Not Translated (0%) | With this knowledge, an institution is better armed to detect any activity that does not have a valid business purpose and does not make sense for the customer. | With this knowledge, an institution is better armed to detect any activity that does not have a valid business purpose and does not make sense for the customer. |
| 185692b6a438-d38f-4f52-ac97-646058c97396 | Not Translated (0%) | For example, a commodity wholesaler is a customer at a bank. | For example, a commodity wholesaler is a customer at a bank. |
| 185792b6a438-d38f-4f52-ac97-646058c97396 | Not Translated (0%) | This wholesaler receives financing from the bank for sending shiploads of grain to ports in Southeast Asia. | This wholesaler receives financing from the bank for sending shiploads of grain to ports in Southeast Asia. |
| 185892b6a438-d38f-4f52-ac97-646058c97396 | Not Translated (0%) | The wholesaler, without notice, begins shipping its product to Dandong, China, near North Korea. | The wholesaler, without notice, begins shipping its product to Dandong, China, near North Korea. |
| 185992b6a438-d38f-4f52-ac97-646058c97396 | Not Translated (0%) | The wholesaler also has delayed providing the underlying trade documentation for the shipments. | The wholesaler also has delayed providing the underlying trade documentation for the shipments. |
| 186092b6a438-d38f-4f52-ac97-646058c97396 | Not Translated (0%) | This change in customer behavior should be a red flag to cause the bank to further clarify the customer relationship. | This change in customer behavior should be a red flag to cause the bank to further clarify the customer relationship. |
| 186192b6a438-d38f-4f52-ac97-646058c97396 | Not Translated (0%) | It would also require the bank to investigate further as to the ultimate destination of the goods. | It would also require the bank to investigate further as to the ultimate destination of the goods. |
| 186292b6a438-d38f-4f52-ac97-646058c97396 | Not Translated (0%) | This same requirement, understanding where the goods will end up, would also apply to the wholesaler if it does not already know. | This same requirement, understanding where the goods will end up, would also apply to the wholesaler if it does not already know. |
| 1863fb69cd1a-3544-47db-b4f3-43e97bf11de3 | Not Translated (0%) | Counterparty Relationships | Counterparty Relationships |
| 186450a64e0d-a553-45f4-b1b2-d5b112f1ade0 | Not Translated (0%) | Given the complexity of a transaction, it is vital for an organization to know not only their customers, but also the customers’ counterparties, as well as the parties who own or control them, in order to understand who may be behind sanctions evasion. | Given the complexity of a transaction, it is vital for an organization to know not only their customers, but also the customers’ counterparties, as well as the parties who own or control them, in order to understand who may be behind sanctions evasion. |
| 186550a64e0d-a553-45f4-b1b2-d5b112f1ade0 | Not Translated (0%) | A counterparty is simply the other side of a transaction—the seller where the customer is the buyer, or vice versa. | A counterparty is simply the other side of a transaction—the seller where the customer is the buyer, or vice versa. |
| 186650a64e0d-a553-45f4-b1b2-d5b112f1ade0 | Not Translated (0%) | An institution establishes counterparty relationships with other third-party participants in a transaction for an established customer. | An institution establishes counterparty relationships with other third-party participants in a transaction for an established customer. |
| 186750a64e0d-a553-45f4-b1b2-d5b112f1ade0 | Not Translated (0%) | Another way to establish a counterparty relationship is to provide a service to an individual or entity that has not established a full customer relationship. | Another way to establish a counterparty relationship is to provide a service to an individual or entity that has not established a full customer relationship. |
| 186850a64e0d-a553-45f4-b1b2-d5b112f1ade0 | Not Translated (0%) | Such a relationship usually exists only for the life of the transaction itself, as there are no agreements or contracts between an institution and this entity or individual. | Such a relationship usually exists only for the life of the transaction itself, as there are no agreements or contracts between an institution and this entity or individual. |
| 186950a64e0d-a553-45f4-b1b2-d5b112f1ade0 | Not Translated (0%) | However, an organization still has the responsibility to screen its counterparties to prevent sanctions violations and identify any potential red flags. | However, an organization still has the responsibility to screen its counterparties to prevent sanctions violations and identify any potential red flags. |
| 1870d848b992-893a-42b1-afb1-bf48e1b0893c | Not Translated (0%) | Two Types of Evasion | Two Types of Evasion |
| 18711b1598a6-f0bf-4dfa-bf6c-ac0aaa4f5af3 | Not Translated (0%) | Evasion can happen in two ways. | Evasion can happen in two ways. |
| 18721b1598a6-f0bf-4dfa-bf6c-ac0aaa4f5af3 | Not Translated (0%) | External evasion happens when the customer or its third-party violates sanctions. | External evasion happens when the customer or its third-party violates sanctions. |
| 18731b1598a6-f0bf-4dfa-bf6c-ac0aaa4f5af3 | Not Translated (0%) | Internal evasion happens when an organization’s own staff members commit a violation, such as stripping. | Internal evasion happens when an organization’s own staff members commit a violation, such as stripping. |
| 18741b1598a6-f0bf-4dfa-bf6c-ac0aaa4f5af3 | Not Translated (0%) | What is internal evasion for one firm (e.g., a firm’s employees removing sanctioned information from a payment message) may be external for another firm (e.g., the firm receiving the stripped payment messages). | What is internal evasion for one firm (e.g., a firm’s employees removing sanctioned information from a payment message) may be external for another firm (e.g., the firm receiving the stripped payment messages). |
| 18751b1598a6-f0bf-4dfa-bf6c-ac0aaa4f5af3 | Not Translated (0%) | When a staff member either intentionally fails to apply or overrides internal controls, it is an example of internal evasion. | When a staff member either intentionally fails to apply or overrides internal controls, it is an example of internal evasion. |
| 18761b1598a6-f0bf-4dfa-bf6c-ac0aaa4f5af3 | Not Translated (0%) | Another example is when a staff member uses client accounts to conceal the origin of funds. | Another example is when a staff member uses client accounts to conceal the origin of funds. |
| 1877c8de0a94-4279-475d-98e7-f00884095ebb | Not Translated (0%) | To evade sanctions, parties and counterparties use techniques that can be creative. | To evade sanctions, parties and counterparties use techniques that can be creative. |
| 1878c8de0a94-4279-475d-98e7-f00884095ebb | Not Translated (0%) | One of these techniques is stripping. | One of these techniques is stripping. |
| 1879c8de0a94-4279-475d-98e7-f00884095ebb | Not Translated (0%) | Depending on the circumstances, it can be blatant or subtle. | Depending on the circumstances, it can be blatant or subtle. |
| 1880e64fa91e-ffc3-41a8-8fac-6873f1736b1b | Not Translated (0%) | Stripping | Stripping |
| 18816ddbc603-b532-465c-96ef-c959370d0464 | Not Translated (0%) | Stripping is the intentional removal or modification of information from a record, either by a customer or by an organization’s staff, to avoid detection against a sanctions list. | Stripping is the intentional removal or modification of information from a record, either by a customer or by an organization’s staff, to avoid detection against a sanctions list. |
| 18826ddbc603-b532-465c-96ef-c959370d0464 | Not Translated (0%) | The most common methods involve intentionally omitting or removing key information from a transaction, such as the sender’s name or the business name. | The most common methods involve intentionally omitting or removing key information from a transaction, such as the sender’s name or the business name. |
| 18836ddbc603-b532-465c-96ef-c959370d0464 | Not Translated (0%) | Stripping may happen with or without the knowledge of other participants in the transaction. | Stripping may happen with or without the knowledge of other participants in the transaction. |
| 18841f5e3a25-d8b5-4cd3-a20b-4ec49d4c5fd9 | Not Translated (0%) | Financial institutions send payment messages, for example, through SWIFT messages. | Financial institutions send payment messages, for example, through SWIFT messages. |
| 18851f5e3a25-d8b5-4cd3-a20b-4ec49d4c5fd9 | Not Translated (0%) | (These are the systems that banks and other financial institutions use to transfer money between institutions. | (These are the systems that banks and other financial institutions use to transfer money between institutions. |
| 18861f5e3a25-d8b5-4cd3-a20b-4ec49d4c5fd9 | Not Translated (0%) | SWIFT stands for Society for Worldwide Interbank Financial Telecommunications.) | SWIFT stands for Society for Worldwide Interbank Financial Telecommunications.) |
| 18871f5e3a25-d8b5-4cd3-a20b-4ec49d4c5fd9 | Not Translated (0%) | Financial institutions later in the payment chain will use programs to search for clues that the message involves a sanctions nexus. | Financial institutions later in the payment chain will use programs to search for clues that the message involves a sanctions nexus. |
| 18881f5e3a25-d8b5-4cd3-a20b-4ec49d4c5fd9 | Not Translated (0%) | They will look for specific keywords, among other items, and when information such as these keywords is stripped from messages, the financial institutions handling the payment messages downstream have little information to review and on which to base a decision. | They will look for specific keywords, among other items, and when information such as these keywords is stripped from messages, the financial institutions handling the payment messages downstream have little information to review and on which to base a decision. |
| 188946a5c8a3-e38f-4e45-a68e-7d6ed4f3fca0 | Not Translated (0%) | An organization’s own staff members can take part in this type of stripping. | An organization’s own staff members can take part in this type of stripping. |
| 1890a2e3bd90-6f30-4174-981d-daba21452c80 | Not Translated (0%) | BANKS FINED FOR STRIPPING | BANKS FINED FOR STRIPPING |
| 18911e212d5b-a385-49d0-a657-dd4a402fb431 | Not Translated (0%) | Here are two examples of banks that received fines for stripping. | Here are two examples of banks that received fines for stripping. |
| 18925afc19e6-9d5a-427a-8120-c3973dea59cb | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 18935afc19e6-9d5a-427a-8120-c3973dea59cb | Not Translated (0%) | BNP PARIBAS, 2015 | BNP PARIBAS, 2015 |
| 1894feabf906-a7a4-4a4d-86e2-f278f4650628 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 1895cd302814-885e-42d3-ae31-3dbcc59e0473 | Not Translated (0%) | In 2014, BNP Paribas received a record fine of $9 billion from the US treasury department’s Office of Foreign Assets Control (OFAC) for essentially providing dollar-clearing services to individuals and entities associated with Sudan, Iran, and Cuba in violation of US sanctions. | In 2014, BNP Paribas received a record fine of $9 billion from the US treasury department’s Office of Foreign Assets Control (OFAC) for essentially providing dollar-clearing services to individuals and entities associated with Sudan, Iran, and Cuba in violation of US sanctions. |
| 1896cd302814-885e-42d3-ae31-3dbcc59e0473 | Not Translated (0%) | (Dollar clearing means converting clients’ payments from a foreign currency into US dollars.) | (Dollar clearing means converting clients’ payments from a foreign currency into US dollars.) |
| 1897b45b8d54-9906-482b-8389-4637fca888e9 | Not Translated (0%) | Some of its staff had stripped references to the sanctioned countries from SWIFT messages. | Some of its staff had stripped references to the sanctioned countries from SWIFT messages. |
| 1898b45b8d54-9906-482b-8389-4637fca888e9 | Not Translated (0%) | As a result, the payments circumvented the screening controls and were processed on behalf of Sudanese, Iranian, and Cuban sanctions targets. | As a result, the payments circumvented the screening controls and were processed on behalf of Sudanese, Iranian, and Cuban sanctions targets. |
| 1899b58ece34-2201-46f1-bff3-6782221266a2 | Not Translated (0%) | BNP Paribas (BNPP) pleaded guilty to criminal conspiracy. | BNP Paribas (BNPP) pleaded guilty to criminal conspiracy. |
| 1900b58ece34-2201-46f1-bff3-6782221266a2 | Not Translated (0%) | US prosecutors said the bank had engaged in a “long-term, multi-jurisdictional conspiracy” that involved the most senior levels at the company. | US prosecutors said the bank had engaged in a “long-term, multi-jurisdictional conspiracy” that involved the most senior levels at the company. |
| 1901b58ece34-2201-46f1-bff3-6782221266a2 | Not Translated (0%) | BNPP repeatedly stripped out references to sanctioned entities in wire transfer messages to US clearing banks, replacing those references with its own name or with a code word. | BNPP repeatedly stripped out references to sanctioned entities in wire transfer messages to US clearing banks, replacing those references with its own name or with a code word. |
| 19029b7f08f8-f946-4831-be66-ce3b6d2f0368 | Not Translated (0%) | Staff within the bank were well aware of the relevant sanctions and restrictions. | Staff within the bank were well aware of the relevant sanctions and restrictions. |
| 19039b7f08f8-f946-4831-be66-ce3b6d2f0368 | Not Translated (0%) | They created a process and issued instructions to circumvent the rules by removing any information that would trip sanctions filters or reveal the involvement of the sanctioned person, entity, or jurisdiction. | They created a process and issued instructions to circumvent the rules by removing any information that would trip sanctions filters or reveal the involvement of the sanctioned person, entity, or jurisdiction. |
| 19049b7f08f8-f946-4831-be66-ce3b6d2f0368 | Not Translated (0%) | Internal messages declared the purpose of this process was “to guarantee the confidentiality of the messages and to avoid their disclosure to any potential regulatory authorities.” | Internal messages declared the purpose of this process was “to guarantee the confidentiality of the messages and to avoid their disclosure to any potential regulatory authorities.” |
| 19059b7f08f8-f946-4831-be66-ce3b6d2f0368 | Not Translated (0%) | Multiple examples in excerpts from internal documents revealed during the prosecution indicate conscious commission of the sanctions violations within BNPP. | Multiple examples in excerpts from internal documents revealed during the prosecution indicate conscious commission of the sanctions violations within BNPP. |
| 19069b7f08f8-f946-4831-be66-ce3b6d2f0368 | Not Translated (0%) | The priority was financial gain for the bank, and the sanctions were seen as an obstacle to be worked around rather than complied with. | The priority was financial gain for the bank, and the sanctions were seen as an obstacle to be worked around rather than complied with. |
| 1907efb68088-9fe0-44f9-9d74-0f70d081104a | Not Translated (0%) | According to the NYDFS (New York Department of Financial Services), BNPP told its bank operations staff, “Do not stipulate in any case the name of Iranian entities on messages transmitted to American banks or to foreign banks installed in the USA.” | According to the NYDFS (New York Department of Financial Services), BNPP told its bank operations staff, “Do not stipulate in any case the name of Iranian entities on messages transmitted to American banks or to foreign banks installed in the USA.” |
| 1908efb68088-9fe0-44f9-9d74-0f70d081104a | Not Translated (0%) | BNPP issued policy directives to ensure that the SWIFT MT202 message named only the “receiving institution (and not the [ultimate] Iranian beneficiary institution),” NYFDS stated. | BNPP issued policy directives to ensure that the SWIFT MT202 message named only the “receiving institution (and not the [ultimate] Iranian beneficiary institution),” NYFDS stated. |
| 190908be1e00-217e-4bc6-8a36-0a68d7082b61 | Not Translated (0%) | Similar to the way they handled transactions related to Iran, BNPP Paris told its Cuban clients not to mention Cuba or any Cuban sanctioned parties in wire messages that the bank’s New York branch processed. | Similar to the way they handled transactions related to Iran, BNPP Paris told its Cuban clients not to mention Cuba or any Cuban sanctioned parties in wire messages that the bank’s New York branch processed. |
| 191008be1e00-217e-4bc6-8a36-0a68d7082b61 | Not Translated (0%) | In early 2006, a senior lawyer at the BNPP Paris head office expressed his doubts about the business: | In early 2006, a senior lawyer at the BNPP Paris head office expressed his doubts about the business: |
| 191108be1e00-217e-4bc6-8a36-0a68d7082b61 | Not Translated (0%) | “We cannot rule out that we would have to explain to OFAC that this is part of a long-standing facility with Cuban entities. | “We cannot rule out that we would have to explain to OFAC that this is part of a long-standing facility with Cuban entities. |
| 191208be1e00-217e-4bc6-8a36-0a68d7082b61 | Not Translated (0%) | Could that trigger a retroactive investigation of all prior payments…?” | Could that trigger a retroactive investigation of all prior payments…?” |
| 191308be1e00-217e-4bc6-8a36-0a68d7082b61 | Not Translated (0%) | The NYDFS order notes that senior BNPP employees authorized continuation of the business because of the long relationships with the customers and to avoid the cost of conversion into euro-denominated loans. | The NYDFS order notes that senior BNPP employees authorized continuation of the business because of the long relationships with the customers and to avoid the cost of conversion into euro-denominated loans. |
| 191408be1e00-217e-4bc6-8a36-0a68d7082b61 | Not Translated (0%) | At the end of 2009, an internal memo described one Cuban party as a “strategic customer with whom we intend to arrange new financing secured by offshore flows.” | At the end of 2009, an internal memo described one Cuban party as a “strategic customer with whom we intend to arrange new financing secured by offshore flows.” |
| 1915e506e037-93c5-4bac-8693-23d48dbdbbc2 | Not Translated (0%) | Compliance staff at BNPP’s Geneva branch met with senior executives from local and Paris offices in September 2005 to express concerns about transactions involving Sudan. | Compliance staff at BNPP’s Geneva branch met with senior executives from local and Paris offices in September 2005 to express concerns about transactions involving Sudan. |
| 1916e506e037-93c5-4bac-8693-23d48dbdbbc2 | Not Translated (0%) | Georges Chodron de Courcel, then BNPP Group chief operating officer, attended, but he dismissed staff members’ concerns and asked that no meeting minutes be kept. | Georges Chodron de Courcel, then BNPP Group chief operating officer, attended, but he dismissed staff members’ concerns and asked that no meeting minutes be kept. |
| 1917e506e037-93c5-4bac-8693-23d48dbdbbc2 | Not Translated (0%) | The bank’s senior compliance staff then elected to continue the business on the grounds that “the relationship with this body of counterparties is a historical one and the commercial stakes are significant.” | The bank’s senior compliance staff then elected to continue the business on the grounds that “the relationship with this body of counterparties is a historical one and the commercial stakes are significant.” |
| 1918b1d2b09b-0556-49dc-9005-37614aa4273b | Not Translated (0%) | In 2004, BNPP entered into a memorandum of understanding (MOU) with New York regulators to correct deficiencies in the monitoring of its correspondent banking relationships with overseas clients and their USD transactions. | In 2004, BNPP entered into a memorandum of understanding (MOU) with New York regulators to correct deficiencies in the monitoring of its correspondent banking relationships with overseas clients and their USD transactions. |
| 1919b1d2b09b-0556-49dc-9005-37614aa4273b | Not Translated (0%) | That same year, BNPP executives from Paris and Geneva met to discuss the impact of US embargoes. | That same year, BNPP executives from Paris and Geneva met to discuss the impact of US embargoes. |
| 1920b1d2b09b-0556-49dc-9005-37614aa4273b | Not Translated (0%) | They developed a solution to protect the New York branch by insulating it from the sanctioned activity and using other unaffiliated US banks. | They developed a solution to protect the New York branch by insulating it from the sanctioned activity and using other unaffiliated US banks. |
| 192174044a5f-d5e1-447b-a7d5-e66430f3a87d | Not Translated (0%) | A local compliance officer warned BNPP Geneva executives that structuring a workaround might be seen as a “serious breach” and a “grave violation.” | A local compliance officer warned BNPP Geneva executives that structuring a workaround might be seen as a “serious breach” and a “grave violation.” |
| 192274044a5f-d5e1-447b-a7d5-e66430f3a87d | Not Translated (0%) | Nonetheless, BNPP implemented the workaround. | Nonetheless, BNPP implemented the workaround. |
| 192374044a5f-d5e1-447b-a7d5-e66430f3a87d | Not Translated (0%) | It continued through March 2008, when the bank was signed off as having met the terms of the 2004 MOU. | It continued through March 2008, when the bank was signed off as having met the terms of the 2004 MOU. |
| 192474044a5f-d5e1-447b-a7d5-e66430f3a87d | Not Translated (0%) | According to the NYDFS, “the bank was fully aware that the 2004 MOU’s termination was based on falsified facts.” | According to the NYDFS, “the bank was fully aware that the 2004 MOU’s termination was based on falsified facts.” |
| 192574044a5f-d5e1-447b-a7d5-e66430f3a87d | Not Translated (0%) | The NYDFS contended that BNPP’s group head of compliance and internal control coordinator was aware of the bank’s continued activities with sanctioned entities but kept silent. | The NYDFS contended that BNPP’s group head of compliance and internal control coordinator was aware of the bank’s continued activities with sanctioned entities but kept silent. |
| 1926dc765cd0-d3b5-4faf-901b-be91b371fb00 | Not Translated (0%) | Other evidence indicated that compliance staff at a senior level were well aware that stripping was widespread. | Other evidence indicated that compliance staff at a senior level were well aware that stripping was widespread. |
| 1927dc765cd0-d3b5-4faf-901b-be91b371fb00 | Not Translated (0%) | For example, the Dutch bank ABN AMRO reached a settlement with US authorities for similar US sanctions breaches in 2005. | For example, the Dutch bank ABN AMRO reached a settlement with US authorities for similar US sanctions breaches in 2005. |
| 1928dc765cd0-d3b5-4faf-901b-be91b371fb00 | Not Translated (0%) | After that settlement, the BNPP head of ethics and compliance for North America commented in an internal message, “the dirty little secret isn’t so secret anymore, oui?” | After that settlement, the BNPP head of ethics and compliance for North America commented in an internal message, “the dirty little secret isn’t so secret anymore, oui?” |
| 1929afa46f8d-de15-4887-aa78-6ace2214f4c7 | Not Translated (0%) | Ben Protess and Jessica Silver-Greenberg, “BNP Paribas Admits Guilt and Agrees to Pay $8.9 Billion Fine to U.S.,” New York Times, June 30, 2014. | Ben Protess and Jessica Silver-Greenberg, “BNP Paribas Admits Guilt and Agrees to Pay $8.9 Billion Fine to U.S.,” New York Times, June 30, 2014. |
| 1930ec1f96f4-a811-44c2-b2f4-d63aac6c634f | Not Translated (0%) | , | , |
| 1931118877b1-dd57-4a47-9f91-82bd35007fe7 | Not Translated (0%) | “France: | “France: |
| 1932118877b1-dd57-4a47-9f91-82bd35007fe7 | Not Translated (0%) | BNP pays fine for violating U.S. sanctions,” Organized Crime and Corruption Reporting Project, July 2, 2014. | BNP pays fine for violating U.S. sanctions,” Organized Crime and Corruption Reporting Project, July 2, 2014. |
| 193373120d4b-ef95-4812-8a6b-703a3cf74523 | Not Translated (0%) | , | , |
| 1934f294d98b-48ab-4148-b9e8-56b9f3c97610 | Not Translated (0%) | Jonathan Masters, “What are economic sanctions?” | Jonathan Masters, “What are economic sanctions?” |
| 1935f294d98b-48ab-4148-b9e8-56b9f3c97610 | Not Translated (0%) | Council on Foreign Relations, August 7, 2017. | Council on Foreign Relations, August 7, 2017. |
| 1936369fed38-2aa3-4db0-ab5e-6203964fa909 | Not Translated (0%) | , | , |
| 1937557c7ee7-6882-4014-b8b8-30815dc92c37 | Not Translated (0%) | Kamal Ahmed, “BNP Paribas to pay $9 billion to settle sanctions violations,” BBC News, July 1, 2014. | Kamal Ahmed, “BNP Paribas to pay $9 billion to settle sanctions violations,” BBC News, July 1, 2014. |
| 1938a96235ba-68ba-47e8-805a-840ed5a6887f | Not Translated (0%) | , | , |
| 1939f8cb0538-13e5-4212-b9a3-e2a7d5fe0f47 | Not Translated (0%) | Martin Arnold and Kara Scannell, “BNP fine sparks calls for cultural change,” July 1, 2014. | Martin Arnold and Kara Scannell, “BNP fine sparks calls for cultural change,” July 1, 2014. |
| 19404e3a06fd-f5d2-4f06-81ea-ec67d08c4024 | Not Translated (0%) | , | , |
| 19414992aac5-efef-49a9-8613-8b5b712fe59a | Not Translated (0%) | Martin Russell, “EU sanctions: | Martin Russell, “EU sanctions: |
| 19424992aac5-efef-49a9-8613-8b5b712fe59a | Not Translated (0%) | A key foreign and security policy instrument,” European Parliamentary Research Service, May 2018. | A key foreign and security policy instrument,” European Parliamentary Research Service, May 2018. |
| 1943bb27b5ff-61b0-4cfc-8b44-7cb37557bfef | Not Translated (0%) | , | , |
| 19447fc536af-5f04-4af4-9146-99001a0e2214 | Not Translated (0%) | Michael Stothard and Martin Arnold, “Biggest threat to BNP Paribas could be to its reputation,” June 30, 2014. | Michael Stothard and Martin Arnold, “Biggest threat to BNP Paribas could be to its reputation,” June 30, 2014. |
| 1945bbdcd929-b7cb-43ab-8fee-1154e0c86fea | Not Translated (0%) | , | , |
| 1946c5525e70-fa9b-4103-93d5-b63e61298cdc | Not Translated (0%) | Patricia Hurtado, “BNP Paribas pleads guilty in U.S. to violating sanctions,” Bloomberg, July 9, 2014. | Patricia Hurtado, “BNP Paribas pleads guilty in U.S. to violating sanctions,” Bloomberg, July 9, 2014. |
| 1947fa25f063-a249-4e3f-b425-f6bab2ab6b3b | Not Translated (0%) | This is a clear case of prioritizing commercial gain over regulatory compliance. | This is a clear case of prioritizing commercial gain over regulatory compliance. |
| 1948fa25f063-a249-4e3f-b425-f6bab2ab6b3b | Not Translated (0%) | It again illustrates the lack of respect within the organization for the laws and regulations that govern the business. | It again illustrates the lack of respect within the organization for the laws and regulations that govern the business. |
| 194904c61ba7-f2b8-4dfe-aafe-a36c64a856a9 | Not Translated (0%) | The following is a list of root causes of the noncompliance: | The following is a list of root causes of the noncompliance: |
| 195013afc365-28ed-4622-8caa-6d9db29cbda0 | Not Translated (0%) | BNPP lacked a compliance culture. | BNPP lacked a compliance culture. |
| 195185699ed0-abe7-42b3-9339-6e3997cd5651 | Not Translated (0%) | A business prioritized commercial gain over regulatory compliance. | A business prioritized commercial gain over regulatory compliance. |
| 195285699ed0-abe7-42b3-9339-6e3997cd5651 | Not Translated (0%) | It saw no need to comply with relevant sanctions. | It saw no need to comply with relevant sanctions. |
| 19531aa0862a-ac33-445f-906c-00b3686b9b85 | Not Translated (0%) | Internal cries of alarm were met with indifference and were not escalated to regulators. | Internal cries of alarm were met with indifference and were not escalated to regulators. |
| 19540ed35b72-3b36-4f0a-bc42-5c54231abc42 | Not Translated (0%) | There was less than full due diligence from the recipients of the payments, given the missing information. | There was less than full due diligence from the recipients of the payments, given the missing information. |
| 19550ed35b72-3b36-4f0a-bc42-5c54231abc42 | Not Translated (0%) | Either the parties receiving the funds were complicit in the deception, or they should have noted the missing or incomplete information. | Either the parties receiving the funds were complicit in the deception, or they should have noted the missing or incomplete information. |
| 1956d87ea552-84e5-4d80-9425-10c57c4d0c36 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 1957eb5eef05-1574-4966-aafd-9b2de65a08ca | Not Translated (0%) | Management prioritized commercial gain over regulatory compliance. | Management prioritized commercial gain over regulatory compliance. |
| 1958eb5eef05-1574-4966-aafd-9b2de65a08ca | Not Translated (0%) | However, the size of the regulatory fine surely outweighed any profits from this aspect of their business. | However, the size of the regulatory fine surely outweighed any profits from this aspect of their business. |
| 19596aa6de63-82b8-4a0a-9224-62c4747117ba | Not Translated (0%) | Internal sanctions controls must be detailed and meticulous to ensure that altered or missing information is flagged and captured before processing. | Internal sanctions controls must be detailed and meticulous to ensure that altered or missing information is flagged and captured before processing. |
| 1960174d4aaf-5d89-42c8-a9d7-dc47ef68c3bd | Not Translated (0%) | Sanctions programs should be tested regularly to ensure that they are current, comprehensive, and effective. | Sanctions programs should be tested regularly to ensure that they are current, comprehensive, and effective. |
| 1961174d4aaf-5d89-42c8-a9d7-dc47ef68c3bd | Not Translated (0%) | These tests should include common evasion methods. | These tests should include common evasion methods. |
| 19624c2e2fe9-ac09-43fa-98aa-b51b74b14fd3 | Not Translated (0%) | CRÉDIT AGRICOLE FINED IN 2015 | CRÉDIT AGRICOLE FINED IN 2015 |
| 19639dfca4ff-df68-403b-b40d-ccbc3b155f91 | Not Translated (0%) | In 2015, Crédit Agricole agreed to a combined settlement of more than $780 million for stripping information from more than 4,000 USD SWIFT payment messages. | In 2015, Crédit Agricole agreed to a combined settlement of more than $780 million for stripping information from more than 4,000 USD SWIFT payment messages. |
| 1964a7ff3e67-e40c-4540-a637-bbfb8eb67921 | Not Translated (0%) | At the time of the settlement, NYDFS also ordered the termination of a specific bank employee who had drafted internal communication instructing the concealment of information relating to Iranian payments. | At the time of the settlement, NYDFS also ordered the termination of a specific bank employee who had drafted internal communication instructing the concealment of information relating to Iranian payments. |
| 19657d8bead7-24a6-4fa5-a08a-e725b0e44992 | Not Translated (0%) | As a result of the stripping, payments were processed in violation of Sudanese, Cuban, Myanmarese, and Iranian sanctions restrictions. | As a result of the stripping, payments were processed in violation of Sudanese, Cuban, Myanmarese, and Iranian sanctions restrictions. |
| 19667d8bead7-24a6-4fa5-a08a-e725b0e44992 | Not Translated (0%) | Operations staff and managers helped remove references to sanctioned individuals or entities from payments going to or through US banks. | Operations staff and managers helped remove references to sanctioned individuals or entities from payments going to or through US banks. |
| 19677d8bead7-24a6-4fa5-a08a-e725b0e44992 | Not Translated (0%) | These personnel were aware of US sanctions and of the requirement to block or reject these transactions, but they developed special payment practices to circumvent the sanctions. | These personnel were aware of US sanctions and of the requirement to block or reject these transactions, but they developed special payment practices to circumvent the sanctions. |
| 1968e56b5662-1825-4896-8727-18aac4663136 | Not Translated (0%) | WHAT IS EXTERNAL STRIPPING? | WHAT IS EXTERNAL STRIPPING? |
| 196929632f4a-218e-4995-8e77-fc61a8573cd2 | Not Translated (0%) | Stripping can happen externally in some situations, but when there are stripping violations at a financial institution, these are rarely entirely external. | Stripping can happen externally in some situations, but when there are stripping violations at a financial institution, these are rarely entirely external. |
| 197029632f4a-218e-4995-8e77-fc61a8573cd2 | Not Translated (0%) | There must be an inside person to commit the crime. | There must be an inside person to commit the crime. |
| 197129632f4a-218e-4995-8e77-fc61a8573cd2 | Not Translated (0%) | The two examples above—BNP Paribas and Crédit Agricole—are both cases of internal stripping. | The two examples above—BNP Paribas and Crédit Agricole—are both cases of internal stripping. |
| 19729ef1c10f-d219-4558-8a3d-9c706f99b175 | Not Translated (0%) | External stripping happens when a party outside the organization removes information from incoming payment messages. | External stripping happens when a party outside the organization removes information from incoming payment messages. |
| 19739ef1c10f-d219-4558-8a3d-9c706f99b175 | Not Translated (0%) | This removal is a deliberate attempt to hide the identity of the sender, recipient, or jurisdiction from where a payment originated. | This removal is a deliberate attempt to hide the identity of the sender, recipient, or jurisdiction from where a payment originated. |
| 1974dd1cfe1a-c5cd-483e-b488-ec83e6bb040f | Not Translated (0%) | WHAT IS A U-TURN PAYMENT? | WHAT IS A U-TURN PAYMENT? |
| 1975d11d8774-9d51-4fef-9ade-d9374248a862 | Not Translated (0%) | A U-turn is a transaction performed by a bank in one country for the benefit of a bank in another country. | A U-turn is a transaction performed by a bank in one country for the benefit of a bank in another country. |
| 1976d11d8774-9d51-4fef-9ade-d9374248a862 | Not Translated (0%) | A bank or other institution from country “A” sends a transaction through a bank in country “B” using an offshore bank. | A bank or other institution from country “A” sends a transaction through a bank in country “B” using an offshore bank. |
| 1977d11d8774-9d51-4fef-9ade-d9374248a862 | Not Translated (0%) | In the financial world, U-turn payments are most commonly known in relation to US sanctions—particularly to those imposed on Iran. | In the financial world, U-turn payments are most commonly known in relation to US sanctions—particularly to those imposed on Iran. |
| 19789efd35f9-df8e-4d07-bd31-87b0a359dd7c | Not Translated (0%) | Before 2008, OFAC allowed a limited exemption under a general license from restrictions that prevented US banks from processing transactions involving Iran or the Iranian government. | Before 2008, OFAC allowed a limited exemption under a general license from restrictions that prevented US banks from processing transactions involving Iran or the Iranian government. |
| 19799efd35f9-df8e-4d07-bd31-87b0a359dd7c | Not Translated (0%) | US dollar transactions were permitted if a US bank was not directly processing a payment for an Iranian entity. | US dollar transactions were permitted if a US bank was not directly processing a payment for an Iranian entity. |
| 19803d995d12-78a9-44b9-b576-040c3cbe594a | Not Translated (0%) | To do this, both the sender and beneficiary banks would use intermediary banks. | To do this, both the sender and beneficiary banks would use intermediary banks. |
| 19813d995d12-78a9-44b9-b576-040c3cbe594a | Not Translated (0%) | This meant that any money that passed through the US clearing system exclusively came from (or was sent to) the intermediary banks, not from the entities directly. | This meant that any money that passed through the US clearing system exclusively came from (or was sent to) the intermediary banks, not from the entities directly. |
| 19823d995d12-78a9-44b9-b576-040c3cbe594a | Not Translated (0%) | Prior to 2008, some financial institutions stripped out offending terms to prevent the transactions being conducted under the limited exemption from being blocked and held up for various review processes. | Prior to 2008, some financial institutions stripped out offending terms to prevent the transactions being conducted under the limited exemption from being blocked and held up for various review processes. |
| 19833d995d12-78a9-44b9-b576-040c3cbe594a | Not Translated (0%) | They were later investigated and scrutinized by regulators for this practice. | They were later investigated and scrutinized by regulators for this practice. |
| 19848e76dfe1-d4b8-4b28-bfaf-ed257777bc04 | Not Translated (0%) | Stripping is associated with U-turn payments. | Stripping is associated with U-turn payments. |
| 19858e76dfe1-d4b8-4b28-bfaf-ed257777bc04 | Not Translated (0%) | To do this, both the sender and beneficiary banks would use intermediary banks. | To do this, both the sender and beneficiary banks would use intermediary banks. |
| 19868e76dfe1-d4b8-4b28-bfaf-ed257777bc04 | Not Translated (0%) | This meant that any money that passed through the US clearing system exclusively came from (or was sent to) the intermediary banks, not from the entities directly. rior to 2008, some financial institutions stripped out offending terms to prevent the transactions being conducted under the limited exemption from being blocked and held up for various review processes. | This meant that any money that passed through the US clearing system exclusively came from (or was sent to) the intermediary banks, not from the entities directly. rior to 2008, some financial institutions stripped out offending terms to prevent the transactions being conducted under the limited exemption from being blocked and held up for various review processes. |
| 19878e76dfe1-d4b8-4b28-bfaf-ed257777bc04 | Not Translated (0%) | They were later investigated and scrutinized by regulators for this practice. | They were later investigated and scrutinized by regulators for this practice. |
| 19882eec5c4e-2ec1-443a-962f-588128911070 | Not Translated (0%) | In 2008, OFAC revoked the U-turn exemption related to Iran. | In 2008, OFAC revoked the U-turn exemption related to Iran. |
| 19892eec5c4e-2ec1-443a-962f-588128911070 | Not Translated (0%) | However, a number of financial institutions continued to process U-turn payments, in violation of a number of sanctions. | However, a number of financial institutions continued to process U-turn payments, in violation of a number of sanctions. |
| 19902eec5c4e-2ec1-443a-962f-588128911070 | Not Translated (0%) | These financial institutions would remove or not include offending terms that would cause a payment to be blocked and reviewed. | These financial institutions would remove or not include offending terms that would cause a payment to be blocked and reviewed. |
| 19912eec5c4e-2ec1-443a-962f-588128911070 | Not Translated (0%) | The most common way that this happens is when an intermediary bank strips information from a payment message before sending it along the transaction chain. | The most common way that this happens is when an intermediary bank strips information from a payment message before sending it along the transaction chain. |
| 1992b90d9d2b-7861-4e50-87df-aa45c3b78183 | Not Translated (0%) | How Iran Receives Dollars for Oil | How Iran Receives Dollars for Oil |
| 1993a66b621e-4a0f-4334-ade1-8f92268c6bd9 | Not Translated (0%) | WHICH SANCTIONS ARE MOST OFTEN ASSOCIATED WITH U-TURN PAYMENTS? | WHICH SANCTIONS ARE MOST OFTEN ASSOCIATED WITH U-TURN PAYMENTS? |
| 1994715e7b63-1e1f-4bfb-8238-873ab519cbe5 | Not Translated (0%) | By using a U-turn payment, it is possible for sanctions evaders to defy the following: | By using a U-turn payment, it is possible for sanctions evaders to defy the following: |
| 19950a21d38a-fa5b-44d5-9e12-f53cc0329d68 | Not Translated (0%) | Targeted sanctions against specific countries | Targeted sanctions against specific countries |
| 1996617aeb23-607f-4fe5-9b9c-25dc00b81dbd | Not Translated (0%) | Inclusion of various entities on the Specially Designated Nationals (SDN) list in an effort to prevent terrorism | Inclusion of various entities on the Specially Designated Nationals (SDN) list in an effort to prevent terrorism |
| 1997c3dfb3da-15b8-4e21-8f04-20dc15000f4c | Not Translated (0%) | Individuals named as SDNs | Individuals named as SDNs |
| 1998979e3c98-beb7-43a4-8822-ad9ce9ded6d2 | Not Translated (0%) | How? | How? |
| 1999979e3c98-beb7-43a4-8822-ad9ce9ded6d2 | Not Translated (0%) | The evader simply removes the relevant information from the payment message or wire. | The evader simply removes the relevant information from the payment message or wire. |
| 20009289ea11-11ed-40cc-81de-0b65d32b2e72 | Not Translated (0%) | There have been examples of U-turn payments related to both Iran and Cuba. | There have been examples of U-turn payments related to both Iran and Cuba. |
| 20019289ea11-11ed-40cc-81de-0b65d32b2e72 | Not Translated (0%) | However, many countries and territories throughout the world have antiterrorism regulations similar to those of the United States. | However, many countries and territories throughout the world have antiterrorism regulations similar to those of the United States. |
| 20029289ea11-11ed-40cc-81de-0b65d32b2e72 | Not Translated (0%) | These countries maintain lists very similar to the OFAC SDN list, and the intended results of those restrictions and punishments are similar. | These countries maintain lists very similar to the OFAC SDN list, and the intended results of those restrictions and punishments are similar. |
| 20039289ea11-11ed-40cc-81de-0b65d32b2e72 | Not Translated (0%) | For example, the Commerce and Economic Development Bureau in Hong Kong has enacted laws to give effect to UN sanctions. | For example, the Commerce and Economic Development Bureau in Hong Kong has enacted laws to give effect to UN sanctions. |
| 20049289ea11-11ed-40cc-81de-0b65d32b2e72 | Not Translated (0%) | Hong Kong has established a sanctions regime and has lists related to UN travel bans, individuals and entities subject to financial sanctions, and specific goods subject to sanctions on North Korea. | Hong Kong has established a sanctions regime and has lists related to UN travel bans, individuals and entities subject to financial sanctions, and specific goods subject to sanctions on North Korea. |
| 2005119e8fff-db81-41fc-821a-ca408e905459 | Not Translated (0%) | In any jurisdiction where the government has prohibited its citizens and businesses operating within its borders from engaging in economic activity with specific countries, governments, businesses, or individuals, there is an incentive to omit identifying information that could prevent a payment or transaction. | In any jurisdiction where the government has prohibited its citizens and businesses operating within its borders from engaging in economic activity with specific countries, governments, businesses, or individuals, there is an incentive to omit identifying information that could prevent a payment or transaction. |
| 2006119e8fff-db81-41fc-821a-ca408e905459 | Not Translated (0%) | For this reason, it is essential to look out for U-turn payments, stripping, and similar violations. | For this reason, it is essential to look out for U-turn payments, stripping, and similar violations. |
| 2007743f4d7e-5b58-42f0-9ec1-db3ff24acf46 | Not Translated (0%) | WHAT IS THE MOTIVATION BEHIND STRIPPING? | WHAT IS THE MOTIVATION BEHIND STRIPPING? |
| 2008d48fc4dd-49de-40e9-9d71-1b543ce45d6b | Not Translated (0%) | There can be many motivations for altering or omitting (stripping) the names of sanctioned entities and individuals from payments and transactions. | There can be many motivations for altering or omitting (stripping) the names of sanctioned entities and individuals from payments and transactions. |
| 2009d48fc4dd-49de-40e9-9d71-1b543ce45d6b | Not Translated (0%) | For example, a business may enter into a contract with an entity that the business owners or managers are fully aware is subject to sanctions. | For example, a business may enter into a contract with an entity that the business owners or managers are fully aware is subject to sanctions. |
| 2010d48fc4dd-49de-40e9-9d71-1b543ce45d6b | Not Translated (0%) | In this case, the owners or managers may deliberately omit information from a payment or other communication to avoid alerting others who are processing or who are otherwise involved in the transaction. | In this case, the owners or managers may deliberately omit information from a payment or other communication to avoid alerting others who are processing or who are otherwise involved in the transaction. |
| 20116e1fcb1d-b822-41ee-aee1-2f65310ce781 | Not Translated (0%) | Depending on the complexity of the transaction, it may be possible for a single bad actor to hide the link to sanctioned individuals or entities. | Depending on the complexity of the transaction, it may be possible for a single bad actor to hide the link to sanctioned individuals or entities. |
| 20126e1fcb1d-b822-41ee-aee1-2f65310ce781 | Not Translated (0%) | However, there is often collusion between two or more parties—the importer and an employee at his or her bank, for example. | However, there is often collusion between two or more parties—the importer and an employee at his or her bank, for example. |
| 20136e1fcb1d-b822-41ee-aee1-2f65310ce781 | Not Translated (0%) | Bank employees in jurisdictions outside the one that has issued the sanctions may act with a sense of patriotism if they or their government disagree with the sanctions. | Bank employees in jurisdictions outside the one that has issued the sanctions may act with a sense of patriotism if they or their government disagree with the sanctions. |
| 20146e1fcb1d-b822-41ee-aee1-2f65310ce781 | Not Translated (0%) | In such cases, managers may all but officially authorize the effort to evade the sanctions. | In such cases, managers may all but officially authorize the effort to evade the sanctions. |
| 20150dee80cb-1b39-4230-90fc-c49f92706ff0 | Not Translated (0%) | Other cases are not based on patriotism, solidarity, or political beliefs. | Other cases are not based on patriotism, solidarity, or political beliefs. |
| 20160dee80cb-1b39-4230-90fc-c49f92706ff0 | Not Translated (0%) | In these cases, a person or entity may offer a bribe to persuade the bank employee to alter or omit the relevant information. | In these cases, a person or entity may offer a bribe to persuade the bank employee to alter or omit the relevant information. |
| 20170dee80cb-1b39-4230-90fc-c49f92706ff0 | Not Translated (0%) | In some cases, the bribe and the bank employee’s personal beliefs may both play a role. | In some cases, the bribe and the bank employee’s personal beliefs may both play a role. |
| 20182bd1879a-8835-481e-a8f2-7baef4cf2e8d | Not Translated (0%) | In early 2019, Standard Chartered Bank agreed to extend its deferred prosecution agreement with US authorities for two more years, in part because of the behavior of two employees at the bank’s Dubai branch. | In early 2019, Standard Chartered Bank agreed to extend its deferred prosecution agreement with US authorities for two more years, in part because of the behavior of two employees at the bank’s Dubai branch. |
| 20192bd1879a-8835-481e-a8f2-7baef4cf2e8d | Not Translated (0%) | Both employees actively assisted formerly blocked customers to reopen accounts and process payments as front companies. | Both employees actively assisted formerly blocked customers to reopen accounts and process payments as front companies. |
| 20202bd1879a-8835-481e-a8f2-7baef4cf2e8d | Not Translated (0%) | A front company to an Iranian money-exchange business gifted one of the employees a large sum of money to buy a car. | A front company to an Iranian money-exchange business gifted one of the employees a large sum of money to buy a car. |
| 20212bd1879a-8835-481e-a8f2-7baef4cf2e8d | Not Translated (0%) | Emails from the employee’s bank email account to the customer mention this gift, which passed through the customer’s account to the employee’s account with Standard Chartered Bank without detection. | Emails from the employee’s bank email account to the customer mention this gift, which passed through the customer’s account to the employee’s account with Standard Chartered Bank without detection. |
| 20222bd1879a-8835-481e-a8f2-7baef4cf2e8d | Not Translated (0%) | That employee went on to actively circumvent bank policy and sanctions to help the customer. | That employee went on to actively circumvent bank policy and sanctions to help the customer. |
| 202304a5105b-7e2d-442a-8ec2-6591e49e841f | Not Translated (0%) | Both employees advised customers how to avoid detection and how to open accounts without tripping the bank’s mechanism for identifying previously blocked entities. | Both employees advised customers how to avoid detection and how to open accounts without tripping the bank’s mechanism for identifying previously blocked entities. |
| 202404a5105b-7e2d-442a-8ec2-6591e49e841f | Not Translated (0%) | In some instances, they advised customers to close their accounts before the bank made a formal report. | In some instances, they advised customers to close their accounts before the bank made a formal report. |
| 202577896316-3502-4d7c-906f-7c4e4e388dc6 | Not Translated (0%) | There can also be institutional incentives to alter payments or transactions. | There can also be institutional incentives to alter payments or transactions. |
| 202677896316-3502-4d7c-906f-7c4e4e388dc6 | Not Translated (0%) | For example, a branch or representative office may be required to enforce sanctions based on where it is primarily incorporated (as is the case with all US-based banks and businesses). | For example, a branch or representative office may be required to enforce sanctions based on where it is primarily incorporated (as is the case with all US-based banks and businesses). |
| 202777896316-3502-4d7c-906f-7c4e4e388dc6 | Not Translated (0%) | Or that branch or representative office may have voluntarily chosen to abide by various sanctions programs because of a presence in those markets and as part of a comprehensive risk management and compliance program. | Or that branch or representative office may have voluntarily chosen to abide by various sanctions programs because of a presence in those markets and as part of a comprehensive risk management and compliance program. |
| 202877896316-3502-4d7c-906f-7c4e4e388dc6 | Not Translated (0%) | Such offices can be at a competitive disadvantage if competitor banks or businesses are not required to comply with sanctions. | Such offices can be at a competitive disadvantage if competitor banks or businesses are not required to comply with sanctions. |
| 202977896316-3502-4d7c-906f-7c4e4e388dc6 | Not Translated (0%) | In this scenario, managers or employees may not appreciate the risk and potential consequences of sanctions evasion. | In this scenario, managers or employees may not appreciate the risk and potential consequences of sanctions evasion. |
| 2030108cb504-2868-4cc8-b6e4-4c040bf00900 | Not Translated (0%) | CHANGING RISKS OF INTERNAL AND EXTERNAL STRIPPING | CHANGING RISKS OF INTERNAL AND EXTERNAL STRIPPING |
| 2031d0f3acd3-953a-4e7e-a5b0-385cd500778b | Not Translated (0%) | Past enforcement against those who took part in stripping has resulted in financial institutions making compliance program changes that are designed to combat internal stripping. | Past enforcement against those who took part in stripping has resulted in financial institutions making compliance program changes that are designed to combat internal stripping. |
| 2032d0f3acd3-953a-4e7e-a5b0-385cd500778b | Not Translated (0%) | As a result, since 2012, fewer sanctions violation cases involving internal stripping have been reported. | As a result, since 2012, fewer sanctions violation cases involving internal stripping have been reported. |
| 2033d0f3acd3-953a-4e7e-a5b0-385cd500778b | Not Translated (0%) | Still, while the likelihood of future internal stripping has considerably diminished, external stripping by outside financial institutions still remains a risk. | Still, while the likelihood of future internal stripping has considerably diminished, external stripping by outside financial institutions still remains a risk. |
| 2034226eacdc-b9f2-401b-a3a2-86ee9514f724 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 2035226eacdc-b9f2-401b-a3a2-86ee9514f724 | Not Translated (0%) | COMMERZBANK, 2015 | COMMERZBANK, 2015 |
| 203652f2b434-4547-400b-97fa-7615cf09e8ad | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 203753a16a24-fd58-4c3e-8c5e-0ae3d3a96f64 | Not Translated (0%) | In March 2015, Commerzbank agreed to a combined fine of $1.45 billion and a deferred prosecution agreement with the US Department of Justice and the New York Department of Financial Services (NYDFS). | In March 2015, Commerzbank agreed to a combined fine of $1.45 billion and a deferred prosecution agreement with the US Department of Justice and the New York Department of Financial Services (NYDFS). |
| 203853a16a24-fd58-4c3e-8c5e-0ae3d3a96f64 | Not Translated (0%) | Commerzbank also reached settlement agreements with OFAC and the board of governors of the Federal Reserve System for violations of the International Emergency Economic Powers Act (IEEPA), the Bank Secrecy Act (BSA), and New York state law. | Commerzbank also reached settlement agreements with OFAC and the board of governors of the Federal Reserve System for violations of the International Emergency Economic Powers Act (IEEPA), the Bank Secrecy Act (BSA), and New York state law. |
| 203953a16a24-fd58-4c3e-8c5e-0ae3d3a96f64 | Not Translated (0%) | By entering into these agreements, Commerzbank admitted and accepted responsibility for criminal conduct in violation of IEEPA. | By entering into these agreements, Commerzbank admitted and accepted responsibility for criminal conduct in violation of IEEPA. |
| 204053a16a24-fd58-4c3e-8c5e-0ae3d3a96f64 | Not Translated (0%) | Commerzbank’s New York office admitted criminal conduct in violation of the BSA and agreed to take remedial steps with its compliance program to implement rigorous internal controls and to ensure future compliance. | Commerzbank’s New York office admitted criminal conduct in violation of the BSA and agreed to take remedial steps with its compliance program to implement rigorous internal controls and to ensure future compliance. |
| 2041ed6b430b-ab24-409c-898b-ab00ed947471 | Not Translated (0%) | The deferred prosecution agreements concerned the “willful” movement of $263 million through the US financial system between 2002 and 2008 for sanctioned individuals and entities in Iran and Sudan. | The deferred prosecution agreements concerned the “willful” movement of $263 million through the US financial system between 2002 and 2008 for sanctioned individuals and entities in Iran and Sudan. |
| 2042ed6b430b-ab24-409c-898b-ab00ed947471 | Not Translated (0%) | Commerzbank used schemes designed to disguise the nature of the payments and the individuals connected to them from US regulators. | Commerzbank used schemes designed to disguise the nature of the payments and the individuals connected to them from US regulators. |
| 2043ed6b430b-ab24-409c-898b-ab00ed947471 | Not Translated (0%) | The bank did this by omitting information from cover messages, removing information from payment messages processed through its own New York office and other US-based financial institutions, and via other purpose-built means. | The bank did this by omitting information from cover messages, removing information from payment messages processed through its own New York office and other US-based financial institutions, and via other purpose-built means. |
| 2044e091c2c1-d7c0-4ab1-87ba-4245cf07854b | Not Translated (0%) | Commerzbank’s Frankfurt office established a specific department to amend any payments involving Iran by removing identification that would flag US sanctions filters. | Commerzbank’s Frankfurt office established a specific department to amend any payments involving Iran by removing identification that would flag US sanctions filters. |
| 2045e091c2c1-d7c0-4ab1-87ba-4245cf07854b | Not Translated (0%) | A custom solution for an Iranian customer involved issuance of Commerzbank checks that showed a London address and an account number but no other identifying information. | A custom solution for an Iranian customer involved issuance of Commerzbank checks that showed a London address and an account number but no other identifying information. |
| 2046e091c2c1-d7c0-4ab1-87ba-4245cf07854b | Not Translated (0%) | These checks allowed the customer to pay US payees. | These checks allowed the customer to pay US payees. |
| 204772e2109e-ca3f-4297-9b55-77a55146e91d | Not Translated (0%) | Compliance staff and senior managers raised concerns about this activity, but the omissions and amendments continued. | Compliance staff and senior managers raised concerns about this activity, but the omissions and amendments continued. |
| 204872e2109e-ca3f-4297-9b55-77a55146e91d | Not Translated (0%) | As a result, the organization began working against itself. | As a result, the organization began working against itself. |
| 204972e2109e-ca3f-4297-9b55-77a55146e91d | Not Translated (0%) | The US–based offices tried to spot and block these transactions, but offices outside of the United | The US–based offices tried to spot and block these transactions, but offices outside of the United |
| 20507a489a82-06a7-46d7-994f-ce6087e49775 | Not Translated (0%) | States actively worked to avoid detection. | States actively worked to avoid detection. |
| 20517a489a82-06a7-46d7-994f-ce6087e49775 | Not Translated (0%) | In spite of people within Commerzbank raising flags and noting concerns, nobody raised the suspicious activity to authorities as they should have. | In spite of people within Commerzbank raising flags and noting concerns, nobody raised the suspicious activity to authorities as they should have. |
| 20527a489a82-06a7-46d7-994f-ce6087e49775 | Not Translated (0%) | This failure resulted in more activity—namely, a multimillion-dollar securities fraud scheme—processing through the bank without detection or intervention. | This failure resulted in more activity—namely, a multimillion-dollar securities fraud scheme—processing through the bank without detection or intervention. |
| 20536fc1a6e3-037e-4254-bcda-d2e3f49b9aff | Not Translated (0%) | “Commerzbank AG admits to sanctions and bank secrecy violations, agrees to forfeit $563 million and pay $79 million fine,” US Department of Justice, March 12, 2015. | “Commerzbank AG admits to sanctions and bank secrecy violations, agrees to forfeit $563 million and pay $79 million fine,” US Department of Justice, March 12, 2015. |
| 20547f21c8c8-bd66-4c26-898a-6e33716ced14 | Not Translated (0%) | , | , |
| 20558abd333d-2f44-4e71-9200-09bd0bdacb3e | Not Translated (0%) | “Commerzbank Deferred Prosecution Agreement,” US District Court for the District of Columbia, March 11, 2015. | “Commerzbank Deferred Prosecution Agreement,” US District Court for the District of Columbia, March 11, 2015. |
| 2056d4db291a-cbb0-4de3-a3aa-5710ca9f3209 | Not Translated (0%) | , | , |
| 2057ad91544f-8460-4a1a-90a1-336a23b09918 | Not Translated (0%) | Matt Anderson, “NYDS announces Commerzbank to pay $1.45 billion, terminate employees, install independent monitor for banking law violations,” New York State Department of Financial Services, March 12, 2015. | Matt Anderson, “NYDS announces Commerzbank to pay $1.45 billion, terminate employees, install independent monitor for banking law violations,” New York State Department of Financial Services, March 12, 2015. |
| 205849a68fe9-4ea0-414c-875c-28aa7a6ddbed | Not Translated (0%) | The root causes of the noncompliance included: | The root causes of the noncompliance included: |
| 205940a599d6-e6fe-4510-b7cf-09485187956f | Not Translated (0%) | Inadequate policies to ensure proper reporting of suspicious activity | Inadequate policies to ensure proper reporting of suspicious activity |
| 2060209e8c89-2583-4cc9-bb00-3728cb34b722 | Not Translated (0%) | Inconsistent policies and lack of transparency within the organization across jurisdictions | Inconsistent policies and lack of transparency within the organization across jurisdictions |
| 2061c2349c3a-3061-43b8-8568-9f33848ecf76 | Not Translated (0%) | Failure of the organization to conduct due diligence on its own foreign offices, their clients, and their practices | Failure of the organization to conduct due diligence on its own foreign offices, their clients, and their practices |
| 20621c72b3b9-4f2d-433d-ad85-a788bb759e47 | Not Translated (0%) | Lack of a proper “compliance culture,” which resulted in concerns raised by compliance staff being ignored | Lack of a proper “compliance culture,” which resulted in concerns raised by compliance staff being ignored |
| 206374a8e7e6-75ea-4c13-a838-ad17d2c927fb | Not Translated (0%) | Inadequate controls to ensure consistent transaction handling and processing | Inadequate controls to ensure consistent transaction handling and processing |
| 2064d1ffbc6a-06ec-4cf0-917a-72446e8807d3 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 2065876a9508-a603-4217-a285-81cba8ccf0f7 | Not Translated (0%) | Institutions routinely invest money and time in their compliance programs. | Institutions routinely invest money and time in their compliance programs. |
| 2066876a9508-a603-4217-a285-81cba8ccf0f7 | Not Translated (0%) | However, if management fails to act on the resulting information, then these investments have no added value. | However, if management fails to act on the resulting information, then these investments have no added value. |
| 20679ad6d658-cad4-4a53-b9d2-8328dfd11189 | Not Translated (0%) | The US Bank Secrecy Act officer’s effectiveness was negated because managers ignored notifications of the volume and seriousness of the internal alert and downplayed flagged transactions. | The US Bank Secrecy Act officer’s effectiveness was negated because managers ignored notifications of the volume and seriousness of the internal alert and downplayed flagged transactions. |
| 20689ad6d658-cad4-4a53-b9d2-8328dfd11189 | Not Translated (0%) | There must be a consistent tone from senior management down through all areas of the bank that reinforces the importance of compliance controls and procedures. | There must be a consistent tone from senior management down through all areas of the bank that reinforces the importance of compliance controls and procedures. |
| 20696f12b927-8d44-46f8-b847-88c068c8b270 | Not Translated (0%) | Even within larger institutions that have comprehensive compliance programs and well-developed processes and procedures, it is possible for a small number of individuals to evade those processes intentionally. | Even within larger institutions that have comprehensive compliance programs and well-developed processes and procedures, it is possible for a small number of individuals to evade those processes intentionally. |
| 2070d935f951-50a0-491f-98ad-26b75f7cb82b | Not Translated (0%) | Policies and controls must be applied consistently against both internal and external parties and entities. | Policies and controls must be applied consistently against both internal and external parties and entities. |
| 2071a1496863-7215-425c-ad72-5f5075501554 | Not Translated (0%) | All staff with compliance responsibilities must clearly understand their responsibilities under internal policies and the laws in their jurisdiction. | All staff with compliance responsibilities must clearly understand their responsibilities under internal policies and the laws in their jurisdiction. |
| 207211e830a7-7674-49af-9a16-da9da4aeb0eb | Not Translated (0%) | Internal policies should not conflict with jurisdictional laws. | Internal policies should not conflict with jurisdictional laws. |
| 207311e830a7-7674-49af-9a16-da9da4aeb0eb | Not Translated (0%) | Had the employees in this case acted on the suspicious information, in compliance with US law, and completed the required suspicious activity reports, the violations would not have been as egregious and the fines would likely have been much lower. | Had the employees in this case acted on the suspicious information, in compliance with US law, and completed the required suspicious activity reports, the violations would not have been as egregious and the fines would likely have been much lower. |
| 20740d4c57d4-e2b7-48c3-9359-e644a62322aa | Not Translated (0%) | WIRE-STRIPPING | WIRE-STRIPPING |
| 2075d3c1e26b-e20d-4d83-a177-ec8b96e3d4e0 | Not Translated (0%) | Sanctions evaders may deliberately strip details from a wire payment, allowing that payment to go undetected. | Sanctions evaders may deliberately strip details from a wire payment, allowing that payment to go undetected. |
| 2076d3c1e26b-e20d-4d83-a177-ec8b96e3d4e0 | Not Translated (0%) | International wire transfers use the Real Time Gross Settlement Systems (RTGS) within a given jurisdiction and correspondent bank accounts when wires travel between countries. | International wire transfers use the Real Time Gross Settlement Systems (RTGS) within a given jurisdiction and correspondent bank accounts when wires travel between countries. |
| 2077d3c1e26b-e20d-4d83-a177-ec8b96e3d4e0 | Not Translated (0%) | When a payment travels through multiple parties before reaching the intended final destination, there are multiple opportunities for information to be abbreviated, omitted, or altered. | When a payment travels through multiple parties before reaching the intended final destination, there are multiple opportunities for information to be abbreviated, omitted, or altered. |
| 2078d3c1e26b-e20d-4d83-a177-ec8b96e3d4e0 | Not Translated (0%) | For this reason, most jurisdictions have enacted laws that require payments to contain certain “basic” information, including the sender and recipient’s name and address. | For this reason, most jurisdictions have enacted laws that require payments to contain certain “basic” information, including the sender and recipient’s name and address. |
| 2079d3c1e26b-e20d-4d83-a177-ec8b96e3d4e0 | Not Translated (0%) | When a wire originates from a sanctioned entity or location, and the intent is to deliver it within the United States or European Union, where restrictions would ordinarily flag the payment and block it, sanctions evaders have an incentive to remove the information that would trip the system. | When a wire originates from a sanctioned entity or location, and the intent is to deliver it within the United States or European Union, where restrictions would ordinarily flag the payment and block it, sanctions evaders have an incentive to remove the information that would trip the system. |
| 2080ccc3d114-d4f9-4a90-85c5-5faabf1ca321 | Not Translated (0%) | Let’s imagine a scenario in which a company in a sanctioned country has an office in Hong Kong through which the country orders raw materials and components. | Let’s imagine a scenario in which a company in a sanctioned country has an office in Hong Kong through which the country orders raw materials and components. |
| 2081ccc3d114-d4f9-4a90-85c5-5faabf1ca321 | Not Translated (0%) | The Hong Kong office shares the sanctioned name, but it operates in an unsanctioned location. | The Hong Kong office shares the sanctioned name, but it operates in an unsanctioned location. |
| 2082ccc3d114-d4f9-4a90-85c5-5faabf1ca321 | Not Translated (0%) | It maintains a banking relationship with a large regional bank that has correspondent relationships in Europe and the United States. | It maintains a banking relationship with a large regional bank that has correspondent relationships in Europe and the United States. |
| 2083ccc3d114-d4f9-4a90-85c5-5faabf1ca321 | Not Translated (0%) | To buy materials from these two markets, the Hong Kong office arranges with its bank to abbreviate their name or to remove it from the outgoing payment wires. | To buy materials from these two markets, the Hong Kong office arranges with its bank to abbreviate their name or to remove it from the outgoing payment wires. |
| 2084ccc3d114-d4f9-4a90-85c5-5faabf1ca321 | Not Translated (0%) | If the bank agrees, no intermediate institutions or systems will flag the involvement of a sanctioned party. | If the bank agrees, no intermediate institutions or systems will flag the involvement of a sanctioned party. |
| 20856be37013-b739-47be-bd7d-2be095d55d4a | Not Translated (0%) | Now let’s reverse the situation. | Now let’s reverse the situation. |
| 20866be37013-b739-47be-bd7d-2be095d55d4a | Not Translated (0%) | A US–based or EU–based business has connections to a sanctioned entity and wants to move funds to that individual or business from the United States. | A US–based or EU–based business has connections to a sanctioned entity and wants to move funds to that individual or business from the United States. |
| 20876be37013-b739-47be-bd7d-2be095d55d4a | Not Translated (0%) | If the bank were to provide full information, including the name of the sanctioned entity or individual, the outgoing payment would be flagged. | If the bank were to provide full information, including the name of the sanctioned entity or individual, the outgoing payment would be flagged. |
| 20886be37013-b739-47be-bd7d-2be095d55d4a | Not Translated (0%) | The parties could avoid this flagging, and thereby evade sanctions, in one of two ways. | The parties could avoid this flagging, and thereby evade sanctions, in one of two ways. |
| 20896be37013-b739-47be-bd7d-2be095d55d4a | Not Translated (0%) | (1) They could provide false information to the US–based or EU–based bank to initiate the payment, and an intermediary institution that was aware of the actual routing could assist in the transaction. | (1) They could provide false information to the US–based or EU–based bank to initiate the payment, and an intermediary institution that was aware of the actual routing could assist in the transaction. |
| 20906be37013-b739-47be-bd7d-2be095d55d4a | Not Translated (0%) | Or (2) a bank employee could be complicit and disguise the beneficiary information until the funds leave the jurisdiction. | Or (2) a bank employee could be complicit and disguise the beneficiary information until the funds leave the jurisdiction. |
| 2091ac0a3920-b406-4c02-a298-73dbb673408e | Not Translated (0%) | Stripping a wire of sanctions-related information cannot effectively be done by a single individual. | Stripping a wire of sanctions-related information cannot effectively be done by a single individual. |
| 2092ac0a3920-b406-4c02-a298-73dbb673408e | Not Translated (0%) | It requires the collusion of multiple individuals or entities to effectively remove or disguise the information. | It requires the collusion of multiple individuals or entities to effectively remove or disguise the information. |
| 20934d76e727-42ec-4481-a710-e566ecb9427c | Not Translated (0%) | Separating Messages | Separating Messages |
| 2094dcad367e-9c1e-47e7-ba26-b1458c38d52f | Not Translated (0%) | THREE TYPES OF SWIFT MESSAGES | THREE TYPES OF SWIFT MESSAGES |
| 2095c9262c56-84e4-4f09-92c3-b369a0e5671c | Not Translated (0%) | A number of payment systems are available in international banking and finance. | A number of payment systems are available in international banking and finance. |
| 2096c9262c56-84e4-4f09-92c3-b369a0e5671c | Not Translated (0%) | This section will focus on SWIFT messages. | This section will focus on SWIFT messages. |
| 2097c9262c56-84e4-4f09-92c3-b369a0e5671c | Not Translated (0%) | SWIFT is the infrastructure supporting both global correspondent banking and domestic payment systems. | SWIFT is the infrastructure supporting both global correspondent banking and domestic payment systems. |
| 2098c9262c56-84e4-4f09-92c3-b369a0e5671c | Not Translated (0%) | The network includes approximately 8,000 financial institutions in more than 200 countries and territories, and it helps promote efficiency in the global payment system. | The network includes approximately 8,000 financial institutions in more than 200 countries and territories, and it helps promote efficiency in the global payment system. |
| 2099c9262c56-84e4-4f09-92c3-b369a0e5671c | Not Translated (0%) | Three types of SWIFT messages for general processing of transactions will be detailed: | Three types of SWIFT messages for general processing of transactions will be detailed: |
| 2100c9262c56-84e4-4f09-92c3-b369a0e5671c | Not Translated (0%) | MT103, MT202, and MT202COV. | MT103, MT202, and MT202COV. |
| 21010ba57fd4-9403-4732-845e-94352be8f0c8 | Not Translated (0%) | Banks and other financial institutions use an MT103 payment message when a single payment is being made between two banks. | Banks and other financial institutions use an MT103 payment message when a single payment is being made between two banks. |
| 21020ba57fd4-9403-4732-845e-94352be8f0c8 | Not Translated (0%) | That message gives instructions to the receiver of the transferred funds. | That message gives instructions to the receiver of the transferred funds. |
| 21030ba57fd4-9403-4732-845e-94352be8f0c8 | Not Translated (0%) | The MT202 and MT202COV messages are the bank-to-bank instructions that tell the intermediary bank to cover the payment of the beneficiary’s bank by crediting the account and debiting the sending bank’s account. | The MT202 and MT202COV messages are the bank-to-bank instructions that tell the intermediary bank to cover the payment of the beneficiary’s bank by crediting the account and debiting the sending bank’s account. |
| 21040ba57fd4-9403-4732-845e-94352be8f0c8 | Not Translated (0%) | Financial institutions use these messages to make customer credit transfers and interbank transfers. | Financial institutions use these messages to make customer credit transfers and interbank transfers. |
| 210528c52337-e061-449b-850b-d792b9a7a22b | Not Translated (0%) | Financial institutions usually send the MT103 and MT202COV messages together so that all parties have full transparency for the transaction. | Financial institutions usually send the MT103 and MT202COV messages together so that all parties have full transparency for the transaction. |
| 210628c52337-e061-449b-850b-d792b9a7a22b | Not Translated (0%) | The original MT103 goes to the beneficiary bank, but copies of the message can go to any intermediary banks needed to process the transaction. | The original MT103 goes to the beneficiary bank, but copies of the message can go to any intermediary banks needed to process the transaction. |
| 210728c52337-e061-449b-850b-d792b9a7a22b | Not Translated (0%) | The messages provide complete information about the remitter and the beneficiary to all banks involved. | The messages provide complete information about the remitter and the beneficiary to all banks involved. |
| 210877d15216-2d16-4d56-829f-549686b16e23 | Not Translated (0%) | HOW A SWIFT MESSAGE GETS SEPARATED | HOW A SWIFT MESSAGE GETS SEPARATED |
| 210970fb241f-19e1-43d1-af78-0fbfc560be7a | Not Translated (0%) | Separating messages means sending two different types of messages for the same payment, but with incomplete or different information. | Separating messages means sending two different types of messages for the same payment, but with incomplete or different information. |
| 211070fb241f-19e1-43d1-af78-0fbfc560be7a | Not Translated (0%) | This type of sanctions evasion happens when more than two banks are involved in the process. | This type of sanctions evasion happens when more than two banks are involved in the process. |
| 211140ab5347-6b32-4276-a299-28ffd304949e | Not Translated (0%) | To decrease processing time, it is common for an originating bank to use the cover method, whereby the originating bank sends the MT103 directly to the beneficiary bank while sending the MT202COV indirectly to the involved correspondent banks. | To decrease processing time, it is common for an originating bank to use the cover method, whereby the originating bank sends the MT103 directly to the beneficiary bank while sending the MT202COV indirectly to the involved correspondent banks. |
| 211240ab5347-6b32-4276-a299-28ffd304949e | Not Translated (0%) | Prior to the creation of the cover method (MT202COV), this situation would leave the intermediary bank with only a partial view of the overall transaction as it would still receive a MT202 payment, but it did not have the required information contained in an underlying MT103 as does the MT202COV. | Prior to the creation of the cover method (MT202COV), this situation would leave the intermediary bank with only a partial view of the overall transaction as it would still receive a MT202 payment, but it did not have the required information contained in an underlying MT103 as does the MT202COV. |
| 211340ab5347-6b32-4276-a299-28ffd304949e | Not Translated (0%) | This left the intermediary bank unable to identify the ultimate originators and beneficiaries because the transfer appeared as a bank-to-bank payment. | This left the intermediary bank unable to identify the ultimate originators and beneficiaries because the transfer appeared as a bank-to-bank payment. |
| 211440ab5347-6b32-4276-a299-28ffd304949e | Not Translated (0%) | The problem was the format of the SWIFT message and the amount of information it was possible to include on it. | The problem was the format of the SWIFT message and the amount of information it was possible to include on it. |
| 211540ab5347-6b32-4276-a299-28ffd304949e | Not Translated (0%) | The intermediary bank wouldn’t know the identity of the ultimate beneficiary because this information was not on the historical format of the MT202 message. | The intermediary bank wouldn’t know the identity of the ultimate beneficiary because this information was not on the historical format of the MT202 message. |
| 211640ab5347-6b32-4276-a299-28ffd304949e | Not Translated (0%) | The intermediary was thus unable to filter for or scan the sender or ultimate beneficiary’s information. | The intermediary was thus unable to filter for or scan the sender or ultimate beneficiary’s information. |
| 211740ab5347-6b32-4276-a299-28ffd304949e | Not Translated (0%) | This situation changed when SWIFT introduced the MT202COV in 2009. | This situation changed when SWIFT introduced the MT202COV in 2009. |
| 211840ab5347-6b32-4276-a299-28ffd304949e | Not Translated (0%) | With the MT202COV, the payment message contains a sequence B field. | With the MT202COV, the payment message contains a sequence B field. |
| 211940ab5347-6b32-4276-a299-28ffd304949e | Not Translated (0%) | Sequence B information must be identical to the same fields of 50a and 59b of the underlying MT103. | Sequence B information must be identical to the same fields of 50a and 59b of the underlying MT103. |
| 212040ab5347-6b32-4276-a299-28ffd304949e | Not Translated (0%) | This is to allow for the identification and screening of the underlying parties. | This is to allow for the identification and screening of the underlying parties. |
| 2121a0203ae4-a024-4712-a6c0-459ef998ca56 | Not Translated (0%) | The SWIFT User Handbook (2009) requires the use of MT202COV when a payment is sent to an intermediary bank involving an underlying customer credit transfer, and both the Basel Committee on Banking Supervision and the Wolfsberg Group have advised banks to follow this process. | The SWIFT User Handbook (2009) requires the use of MT202COV when a payment is sent to an intermediary bank involving an underlying customer credit transfer, and both the Basel Committee on Banking Supervision and the Wolfsberg Group have advised banks to follow this process. |
| 2122a0203ae4-a024-4712-a6c0-459ef998ca56 | Not Translated (0%) | However, if the sending bank is motivated to conceal the ultimate beneficiary of the funds, it could avoid sending full information to all banks involved in the transaction. | However, if the sending bank is motivated to conceal the ultimate beneficiary of the funds, it could avoid sending full information to all banks involved in the transaction. |
| 2123a0203ae4-a024-4712-a6c0-459ef998ca56 | Not Translated (0%) | Instead, the sending bank could send an MT103 message to the beneficiary’s bank to credit the customer’s account, which would be the ultimate destination of the funds. | Instead, the sending bank could send an MT103 message to the beneficiary’s bank to credit the customer’s account, which would be the ultimate destination of the funds. |
| 2124a0203ae4-a024-4712-a6c0-459ef998ca56 | Not Translated (0%) | The sending bank would perhaps include a reference to the cover payment, such as “cover to follow” or something similar. | The sending bank would perhaps include a reference to the cover payment, such as “cover to follow” or something similar. |
| 2125a0203ae4-a024-4712-a6c0-459ef998ca56 | Not Translated (0%) | Then the sending bank would send an MT202 message (designed for interbank settlement messages only) to the intermediary bank, with instructions to credit the beneficiary’s bank. | Then the sending bank would send an MT202 message (designed for interbank settlement messages only) to the intermediary bank, with instructions to credit the beneficiary’s bank. |
| 2126a0203ae4-a024-4712-a6c0-459ef998ca56 | Not Translated (0%) | This message would have no information concerning the ultimate beneficiary or sender and no sequence B. | This message would have no information concerning the ultimate beneficiary or sender and no sequence B. |
| 2127ccc83968-13e3-4a85-ac98-5a84cb7e24ae | Not Translated (0%) | The MT202, as opposed to the MT202COV, does not have fields to include the originator and beneficiary information (sequence B). | The MT202, as opposed to the MT202COV, does not have fields to include the originator and beneficiary information (sequence B). |
| 2128ccc83968-13e3-4a85-ac98-5a84cb7e24ae | Not Translated (0%) | Therefore, the intermediary bank is blind to the details behind the transaction and could unknowingly process payments involving sanctioned entities or individuals. | Therefore, the intermediary bank is blind to the details behind the transaction and could unknowingly process payments involving sanctioned entities or individuals. |
| 2129ccc83968-13e3-4a85-ac98-5a84cb7e24ae | Not Translated (0%) | The banks involved in sending the SWIFT messages and transferring the money (and those banks’ employees) are the only parties that have the power to alter the information in this flow. | The banks involved in sending the SWIFT messages and transferring the money (and those banks’ employees) are the only parties that have the power to alter the information in this flow. |
| 2130ccc83968-13e3-4a85-ac98-5a84cb7e24ae | Not Translated (0%) | However, as explained earlier, there can be many motivations for bank employees to consciously omit important information. | However, as explained earlier, there can be many motivations for bank employees to consciously omit important information. |
| 2131c5d24a48-b522-4acf-9fd4-be0b3e6904d5 | Not Translated (0%) | Auditors, investigators, and authorities face several challenges when investigating this type of sanctions evasion, as message records can be stored in different formats and at different locations. | Auditors, investigators, and authorities face several challenges when investigating this type of sanctions evasion, as message records can be stored in different formats and at different locations. |
| 2132c5d24a48-b522-4acf-9fd4-be0b3e6904d5 | Not Translated (0%) | Reconstructing a payment flow can take significant effort given the volume of SWIFT messages. | Reconstructing a payment flow can take significant effort given the volume of SWIFT messages. |
| 2133c5d24a48-b522-4acf-9fd4-be0b3e6904d5 | Not Translated (0%) | In 2017, the network carried more than 27 million messages per day across 200 countries. | In 2017, the network carried more than 27 million messages per day across 200 countries. |
| 2134c5d24a48-b522-4acf-9fd4-be0b3e6904d5 | Not Translated (0%) | With the introduction of the MT202COV message, there is a lower probability of the intermediary bank not having full information on the payment. | With the introduction of the MT202COV message, there is a lower probability of the intermediary bank not having full information on the payment. |
| 2135c5d24a48-b522-4acf-9fd4-be0b3e6904d5 | Not Translated (0%) | However, if the originating bank’s intent is to evade sanctions, it could alter the information on the MT202COV to hide the sanctioned entity’s or individual’s name. | However, if the originating bank’s intent is to evade sanctions, it could alter the information on the MT202COV to hide the sanctioned entity’s or individual’s name. |
| 2136c5d24a48-b522-4acf-9fd4-be0b3e6904d5 | Not Translated (0%) | The originating bank could also send an MT202 and mislead the intermediary bank that the transfer is a traditional interbank credit and does not involve another sender or beneficiary. | The originating bank could also send an MT202 and mislead the intermediary bank that the transfer is a traditional interbank credit and does not involve another sender or beneficiary. |
| 2137fa78cc89-0f5d-4b12-a670-d0d89da38533 | Not Translated (0%) | The SWIFT network places the responsibility on the originating bank to select the correct message type and complete it with factual and accurate information. | The SWIFT network places the responsibility on the originating bank to select the correct message type and complete it with factual and accurate information. |
| 2138fa78cc89-0f5d-4b12-a670-d0d89da38533 | Not Translated (0%) | Therefore, if the originating bank or its employees intend to evade sanctions, it remains possible to do so. | Therefore, if the originating bank or its employees intend to evade sanctions, it remains possible to do so. |
| 2139fa78cc89-0f5d-4b12-a670-d0d89da38533 | Not Translated (0%) | For example, in April 2019, the US Department of Justice and the United Kingdom’s Financial Conduct Authority fined Standard Chartered Bank $1.1 billion. | For example, in April 2019, the US Department of Justice and the United Kingdom’s Financial Conduct Authority fined Standard Chartered Bank $1.1 billion. |
| 2140fa78cc89-0f5d-4b12-a670-d0d89da38533 | Not Translated (0%) | The fine was for violating sanctions related to Iran and processing payments in US dollars for entities tied to that country. | The fine was for violating sanctions related to Iran and processing payments in US dollars for entities tied to that country. |
| 2141fa78cc89-0f5d-4b12-a670-d0d89da38533 | Not Translated (0%) | Standard Chartered Bank routed payments from its Dubai office through New York. | Standard Chartered Bank routed payments from its Dubai office through New York. |
| 2142fa78cc89-0f5d-4b12-a670-d0d89da38533 | Not Translated (0%) | According to the bank, the violations happened because two junior employees were aware of both the sanctions and the Iranian connections for the customers involved in the transactions. | According to the bank, the violations happened because two junior employees were aware of both the sanctions and the Iranian connections for the customers involved in the transactions. |
| 2143fa78cc89-0f5d-4b12-a670-d0d89da38533 | Not Translated (0%) | These two employees conspired with the customers to violate the laws and bank policies. | These two employees conspired with the customers to violate the laws and bank policies. |
| 2144fa78cc89-0f5d-4b12-a670-d0d89da38533 | Not Translated (0%) | In spite of a structure designed to provide full transparency and a financial institution’s best efforts in terms of training and policies, it remains possible to evade sanctions by using this method. | In spite of a structure designed to provide full transparency and a financial institution’s best efforts in terms of training and policies, it remains possible to evade sanctions by using this method. |
| 2145cf259646-563c-4318-8b38-7dfe15ede2e5 | Not Translated (0%) | SWIFT MESSAGES FOR INTERNATIONAL PAYMENTS | SWIFT MESSAGES FOR INTERNATIONAL PAYMENTS |
| 214669a5fc3f-12ea-43d4-9fb2-b00a4123bb76 | Not Translated (0%) | Let’s look at a scenario for international cross border payments. | Let’s look at a scenario for international cross border payments. |
| 214769a5fc3f-12ea-43d4-9fb2-b00a4123bb76 | Not Translated (0%) | The originator and beneficiary are individuals in different parts of the world—Frankfurt and Hong Kong. | The originator and beneficiary are individuals in different parts of the world—Frankfurt and Hong Kong. |
| 214869a5fc3f-12ea-43d4-9fb2-b00a4123bb76 | Not Translated (0%) | They engage in financial transactions with each other through the international banking system. | They engage in financial transactions with each other through the international banking system. |
| 21496b6d786b-cb6b-4648-b9f1-2a0aeed3b3b6 | Not Translated (0%) | SWIFT Messaging Mechanics 1 | SWIFT Messaging Mechanics 1 |
| 2150fb151589-4524-49c2-9997-8b3c684467f7 | Not Translated (0%) | Banks A and B are, respectively, the originator’s and beneficiary’s banks in their home countries. | Banks A and B are, respectively, the originator’s and beneficiary’s banks in their home countries. |
| 2151fb151589-4524-49c2-9997-8b3c684467f7 | Not Translated (0%) | Banks C and D have correspondent relationships with Banks A and B respectively. | Banks C and D have correspondent relationships with Banks A and B respectively. |
| 2152a2d2753d-6277-478a-8fbf-29727b786ad3 | Not Translated (0%) | Swift Messaging Mechanics 2 | Swift Messaging Mechanics 2 |
| 21531a56cabc-3754-4dbd-a900-50c4fda15cc9 | Not Translated (0%) | The originator goes to Bank A and arranges for a payment to be made to the beneficiary’s account in Bank B. Bank A sends an MT103 payment message to Bank B. If Bank A has an account with Bank B in the currency of the transaction, then no other SWIFT message is necessary. | The originator goes to Bank A and arranges for a payment to be made to the beneficiary’s account in Bank B. Bank A sends an MT103 payment message to Bank B. If Bank A has an account with Bank B in the currency of the transaction, then no other SWIFT message is necessary. |
| 215434ec6c92-19c3-4739-bcf9-51fda7308a9e | Not Translated (0%) | But what if the transaction needs to be in Hong Kong dollars and Bank A doesn’t hold an account in this currency with Bank B? | But what if the transaction needs to be in Hong Kong dollars and Bank A doesn’t hold an account in this currency with Bank B? |
| 215534ec6c92-19c3-4739-bcf9-51fda7308a9e | Not Translated (0%) | In that case, Bank A has two options. | In that case, Bank A has two options. |
| 215634ec6c92-19c3-4739-bcf9-51fda7308a9e | Not Translated (0%) | It may first use a method called the MT103 serial payment. | It may first use a method called the MT103 serial payment. |
| 215734ec6c92-19c3-4739-bcf9-51fda7308a9e | Not Translated (0%) | Using this method, Bank A sends the MT103 message to Bank C, which will then send the MT103 message to Bank D, which will then send the MT103 message to Bank B. The MT103 serial payment can be time consuming as each involved bank must review and process the payment. | Using this method, Bank A sends the MT103 message to Bank C, which will then send the MT103 message to Bank D, which will then send the MT103 message to Bank B. The MT103 serial payment can be time consuming as each involved bank must review and process the payment. |
| 2158d66b2b7d-b803-461d-8614-2972831d0193 | Not Translated (0%) | Alternatively, it can use the cover method. | Alternatively, it can use the cover method. |
| 2159d66b2b7d-b803-461d-8614-2972831d0193 | Not Translated (0%) | Bank A will send an MT103 message to Bank B. At the same time, it will send an MT202COV message to its correspondent (the first intermediary), which is Bank C. The MT202COV message must contain the originator and beneficiary information to be used for sanctions screening. | Bank A will send an MT103 message to Bank B. At the same time, it will send an MT202COV message to its correspondent (the first intermediary), which is Bank C. The MT202COV message must contain the originator and beneficiary information to be used for sanctions screening. |
| 2160d66b2b7d-b803-461d-8614-2972831d0193 | Not Translated (0%) | If Bank C was also the correspondent bank for Bank B, it could then settle the payment immediately upon receiving the MT202COV. | If Bank C was also the correspondent bank for Bank B, it could then settle the payment immediately upon receiving the MT202COV. |
| 2161d66b2b7d-b803-461d-8614-2972831d0193 | Not Translated (0%) | Such is not the case in the below example. | Such is not the case in the below example. |
| 2162d66b2b7d-b803-461d-8614-2972831d0193 | Not Translated (0%) | Because Bank C does not have a correspondent relationship with Bank B, it then sends another MT202COV to another correspondent (the second intermediary), in this case Bank D, which does have a correspondent relationship with Bank B. Upon receiving the MT202COV message, Bank D would send an MT910 Credit Advice to Bank B in order to complete the transaction. | Because Bank C does not have a correspondent relationship with Bank B, it then sends another MT202COV to another correspondent (the second intermediary), in this case Bank D, which does have a correspondent relationship with Bank B. Upon receiving the MT202COV message, Bank D would send an MT910 Credit Advice to Bank B in order to complete the transaction. |
| 2163d66b2b7d-b803-461d-8614-2972831d0193 | Not Translated (0%) | However, if Bank C did not have a relationship with Bank D, it may have to find another intermediary that did have a relationship with Bank D, thus creating another intermediary. | However, if Bank C did not have a relationship with Bank D, it may have to find another intermediary that did have a relationship with Bank D, thus creating another intermediary. |
| 2164c9c3312c-9866-4244-ae9c-38dc22098e9a | Not Translated (0%) | SWIFT Messaging Mechanics 3 | SWIFT Messaging Mechanics 3 |
| 2165a7afb38c-2a79-462b-9979-540488a909f3 | Not Translated (0%) | Because the MT202 message does not have the fields for the originator and the beneficiary information, it was replaced, in November 2009, by the MT202COV message, which does include the originator and the beneficiary information in order to support sanctions screening. | Because the MT202 message does not have the fields for the originator and the beneficiary information, it was replaced, in November 2009, by the MT202COV message, which does include the originator and the beneficiary information in order to support sanctions screening. |
| 2166f3776fbb-cb90-4d31-ad85-65918f741918 | Not Translated (0%) | Since November 2009, the MT202 message should only be used for payments between banks where the originator and the beneficiary information is not required because customers are not involved in the transaction. | Since November 2009, the MT202 message should only be used for payments between banks where the originator and the beneficiary information is not required because customers are not involved in the transaction. |
| 216720e75068-c739-43d7-8f07-eb57c4de5c04 | Not Translated (0%) | In 2015, US regulators fined Deutsche Bank for evading sanctions restrictions. | In 2015, US regulators fined Deutsche Bank for evading sanctions restrictions. |
| 216820e75068-c739-43d7-8f07-eb57c4de5c04 | Not Translated (0%) | One way the organization did this was to use MT103 and MT202 messages. | One way the organization did this was to use MT103 and MT202 messages. |
| 216920e75068-c739-43d7-8f07-eb57c4de5c04 | Not Translated (0%) | This ensured that Deutsche Bank’s New York entity, and other US clearing banks, did not receive the originator and the beneficiary information about the underlying sanctioned parties involved in the transactions. | This ensured that Deutsche Bank’s New York entity, and other US clearing banks, did not receive the originator and the beneficiary information about the underlying sanctioned parties involved in the transactions. |
| 2170a90f00a9-157e-4376-8d1c-419b4cddc4fe | Not Translated (0%) | Payments and Transactions | Payments and Transactions |
| 2171edbc7bea-3ab8-41ec-977c-8161c069e784 | Not Translated (0%) | What other tactics do people use to try to trick an automated screening tool or otherwise avoid detection during sanctions payment screening? | What other tactics do people use to try to trick an automated screening tool or otherwise avoid detection during sanctions payment screening? |
| 217202b48821-816a-48c7-9f7a-4b9fa4402e81 | Not Translated (0%) | They may rearrange the data if they know of a field that isn’t routinely screened. | They may rearrange the data if they know of a field that isn’t routinely screened. |
| 21732bdc11e9-0443-4181-bf7e-b0d7ac604961 | Not Translated (0%) | They may replace information with false data. | They may replace information with false data. |
| 21742bdc11e9-0443-4181-bf7e-b0d7ac604961 | Not Translated (0%) | For example, they may use a bank identifier code assigned to a bank in a neutral country. | For example, they may use a bank identifier code assigned to a bank in a neutral country. |
| 21752bdc11e9-0443-4181-bf7e-b0d7ac604961 | Not Translated (0%) | Or they may use unusual combinations of characters, such as “%&%$%.” | Or they may use unusual combinations of characters, such as “%&%$%.” |
| 21762bdc11e9-0443-4181-bf7e-b0d7ac604961 | Not Translated (0%) | Similar to the way email spammers might use special characters that may look like letters but not be recognized as letters by automatic filters, they seek to avoid detection by altering a name or providing nonsensical input in “mandatory fill” fields while avoiding detection as a sanctioned destination or entity. | Similar to the way email spammers might use special characters that may look like letters but not be recognized as letters by automatic filters, they seek to avoid detection by altering a name or providing nonsensical input in “mandatory fill” fields while avoiding detection as a sanctioned destination or entity. |
| 2177f482b495-c576-4bf8-9fe8-31fddb01cc08 | Not Translated (0%) | They may use red-flag phrases such as “No name,” or “On behalf of….” | They may use red-flag phrases such as “No name,” or “On behalf of….” |
| 2178ec363137-56f1-4207-ab3c-70d09c8e721f | Not Translated (0%) | They may alter or abbreviate the sender or beneficiary’s name, change the spelling to how it sounds, add spaces within the name, or omit a middle name. | They may alter or abbreviate the sender or beneficiary’s name, change the spelling to how it sounds, add spaces within the name, or omit a middle name. |
| 217909f1fad9-9c8c-4fa7-9593-9988087e8ce7 | Not Translated (0%) | They may manually alter a message before sending it to the next financial institution. | They may manually alter a message before sending it to the next financial institution. |
| 21805d1e7af4-2c39-497c-967c-cbe1ea1a037c | Not Translated (0%) | It is important to review the entire contents of a message when there is a hit or an alert. | It is important to review the entire contents of a message when there is a hit or an alert. |
| 21815d1e7af4-2c39-497c-967c-cbe1ea1a037c | Not Translated (0%) | Organizations must check the way their screening systems review a payment message. | Organizations must check the way their screening systems review a payment message. |
| 21825d1e7af4-2c39-497c-967c-cbe1ea1a037c | Not Translated (0%) | Are all fields scanned? | Are all fields scanned? |
| 21835d1e7af4-2c39-497c-967c-cbe1ea1a037c | Not Translated (0%) | Can the filters be set to detect inconsistencies, such as routing numbers or bank identification codes that don’t match the names within the message? | Can the filters be set to detect inconsistencies, such as routing numbers or bank identification codes that don’t match the names within the message? |
| 21845d1e7af4-2c39-497c-967c-cbe1ea1a037c | Not Translated (0%) | Can the filters be set to create an alert when a field contains combinations of numbers and characters when it should contain text? | Can the filters be set to create an alert when a field contains combinations of numbers and characters when it should contain text? |
| 21855d1e7af4-2c39-497c-967c-cbe1ea1a037c | Not Translated (0%) | Individuals use messages in many ways to try to evade detection, and it is important to make sure that any automated methods used are calibrated effectively and that the review and adjudication of alerts is thorough. | Individuals use messages in many ways to try to evade detection, and it is important to make sure that any automated methods used are calibrated effectively and that the review and adjudication of alerts is thorough. |
| 21864c1b6a56-ed8b-4ef4-85cf-ffa66faa6a52 | Not Translated (0%) | USING NESTED ACCOUNTS | USING NESTED ACCOUNTS |
| 2187055c2598-eb0c-4276-9979-cf197e29b97b | Not Translated (0%) | Correspondent bank accounts are necessary for the global financial system to function smoothly. | Correspondent bank accounts are necessary for the global financial system to function smoothly. |
| 2188055c2598-eb0c-4276-9979-cf197e29b97b | Not Translated (0%) | Regulators understand and accept this, provided there is transparency and all parties engaged in day-to-day payment traffic understand whom they are facing in these transactions. | Regulators understand and accept this, provided there is transparency and all parties engaged in day-to-day payment traffic understand whom they are facing in these transactions. |
| 2189055c2598-eb0c-4276-9979-cf197e29b97b | Not Translated (0%) | Nested accounts | Nested accounts |
| 219006b52f44-6385-4554-8c90-80515b0a1db7 | Not Translated (0%) | happen when a foreign financial institution accesses the US financial system through an account it holds with another foreign financial institution—without the parties within the US financial system understanding that they are facing a customer’s customer. | happen when a foreign financial institution accesses the US financial system through an account it holds with another foreign financial institution—without the parties within the US financial system understanding that they are facing a customer’s customer. |
| 21916ced6416-2c4b-4872-8528-0fb850b5f0b9 | Not Translated (0%) | For example, let’s say Bank A in China has an account with Bank B in Italy. | For example, let’s say Bank A in China has an account with Bank B in Italy. |
| 21926ced6416-2c4b-4872-8528-0fb850b5f0b9 | Not Translated (0%) | Bank A, which is on a government sanctions list, initiates a payment on behalf of its customer (also in China) through Bank B to make a payment in US dollars to a US manufacturer. | Bank A, which is on a government sanctions list, initiates a payment on behalf of its customer (also in China) through Bank B to make a payment in US dollars to a US manufacturer. |
| 21936ced6416-2c4b-4872-8528-0fb850b5f0b9 | Not Translated (0%) | The US bank receiving the payment for their customer may only see the name of Bank B and the original sender, with no evidence of Bank A’s involvement. | The US bank receiving the payment for their customer may only see the name of Bank B and the original sender, with no evidence of Bank A’s involvement. |
| 2194b8692d9a-dc77-432e-afc0-c40dbcdce98e | Not Translated (0%) | Another example would be a bank in a sanctioned location, such as Iran. | Another example would be a bank in a sanctioned location, such as Iran. |
| 2195b8692d9a-dc77-432e-afc0-c40dbcdce98e | Not Translated (0%) | This bank would be in receipt of dollar payments from activity elsewhere in the world and unable to clear those payments. | This bank would be in receipt of dollar payments from activity elsewhere in the world and unable to clear those payments. |
| 2196b8692d9a-dc77-432e-afc0-c40dbcdce98e | Not Translated (0%) | The Iranian bank would use a correspondent account at a bank in an unsanctioned location to send the dollars to the United States for clearing and would arrange for their name to be removed from the payment communication. | The Iranian bank would use a correspondent account at a bank in an unsanctioned location to send the dollars to the United States for clearing and would arrange for their name to be removed from the payment communication. |
| 2197b8692d9a-dc77-432e-afc0-c40dbcdce98e | Not Translated (0%) | This scheme requires the willing or ignorant cooperation of the second foreign financial institution to ensure that the information pertaining to the sanctioned entity or location is not included in any payment communication to the US bank. | This scheme requires the willing or ignorant cooperation of the second foreign financial institution to ensure that the information pertaining to the sanctioned entity or location is not included in any payment communication to the US bank. |
| 2198534c38f1-d886-40c5-95a2-2fc5d2ddc5df | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 2199534c38f1-d886-40c5-95a2-2fc5d2ddc5df | Not Translated (0%) | BNP PARIBAS AND SUDANESE CUSTOMERS, 2015 | BNP PARIBAS AND SUDANESE CUSTOMERS, 2015 |
| 220019775a70-6867-4b43-9b0e-f76ac2761a39 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 220173a68ea4-6eb0-474a-b98c-e9e3269caa2a | Not Translated (0%) | This study guide has already addressed the large fine BNP Paribas (BNPP) incurred for violating sanctions restrictions and providing US-dollar clearing services for sanctioned countries. | This study guide has already addressed the large fine BNP Paribas (BNPP) incurred for violating sanctions restrictions and providing US-dollar clearing services for sanctioned countries. |
| 220273a68ea4-6eb0-474a-b98c-e9e3269caa2a | Not Translated (0%) | It will now take a closer look at the activity within that event that related specifically to Sudan. | It will now take a closer look at the activity within that event that related specifically to Sudan. |
| 22038f99c8b0-d69e-4600-83ef-96e5668811d5 | Not Translated (0%) | BNPP processed approximately $6.4 billion through the US financial system for Sudanese sanctioned entities from July 2006 until June 2007. | BNPP processed approximately $6.4 billion through the US financial system for Sudanese sanctioned entities from July 2006 until June 2007. |
| 22048f99c8b0-d69e-4600-83ef-96e5668811d5 | Not Translated (0%) | This included approximately $4 billion on behalf of a financial institution owned by the government of Sudan. | This included approximately $4 billion on behalf of a financial institution owned by the government of Sudan. |
| 22058f99c8b0-d69e-4600-83ef-96e5668811d5 | Not Translated (0%) | Internal emails showed BNPP employees raising concerns about these activities, citing the role of the Sudanese government in supporting terrorism and committing human rights abuses. | Internal emails showed BNPP employees raising concerns about these activities, citing the role of the Sudanese government in supporting terrorism and committing human rights abuses. |
| 22068f99c8b0-d69e-4600-83ef-96e5668811d5 | Not Translated (0%) | In March 2007, one senior compliance officer at BNPP wrote to other high-level BNPP compliance and legal employees. | In March 2007, one senior compliance officer at BNPP wrote to other high-level BNPP compliance and legal employees. |
| 2207b82d51e3-bdbc-43b3-b54b-77c1dfb52a58 | Not Translated (0%) | The illegal transactions went through a network of satellite banks where BNP’s accounts were essentially nested. | The illegal transactions went through a network of satellite banks where BNP’s accounts were essentially nested. |
| 2208b82d51e3-bdbc-43b3-b54b-77c1dfb52a58 | Not Translated (0%) | This scheme allowed BNPP to disguise its own role and the sanctioned entities’ roles in the payments to and from financial institutions in the United States. | This scheme allowed BNPP to disguise its own role and the sanctioned entities’ roles in the payments to and from financial institutions in the United States. |
| 2209b82d51e3-bdbc-43b3-b54b-77c1dfb52a58 | Not Translated (0%) | This activity was flagged internally in August 2005, when a senior compliance officer at BNPP warned several legal, business, and compliance personnel at BNPP’s Geneva office that these accounts were being used to evade US sanctions. | This activity was flagged internally in August 2005, when a senior compliance officer at BNPP warned several legal, business, and compliance personnel at BNPP’s Geneva office that these accounts were being used to evade US sanctions. |
| 2210b82d51e3-bdbc-43b3-b54b-77c1dfb52a58 | Not Translated (0%) | The senior compliance officer noted: | The senior compliance officer noted: |
| 2211b82d51e3-bdbc-43b3-b54b-77c1dfb52a58 | Not Translated (0%) | “As I understand it, we have a number of Arab Banks (nine identified) on our books that only carry out clearing transactions for Sudanese banks in dollars This practice effectively means that we are circumventing the US embargo on transactions in [US dollars] by Sudan.” | “As I understand it, we have a number of Arab Banks (nine identified) on our books that only carry out clearing transactions for Sudanese banks in dollars This practice effectively means that we are circumventing the US embargo on transactions in [US dollars] by Sudan.” |
| 2212e4cfa799-2588-4986-ac03-0cb5b33d200a | Not Translated (0%) | In several interviews that happened before the final decision by the Department of Justice, government officials noted that BNPP’s staff outside of the United States were not fully aware that the transactions they conducted in Europe breached sanctions. | In several interviews that happened before the final decision by the Department of Justice, government officials noted that BNPP’s staff outside of the United States were not fully aware that the transactions they conducted in Europe breached sanctions. |
| 2213e4cfa799-2588-4986-ac03-0cb5b33d200a | Not Translated (0%) | It took time for full awareness to develop within the institution. | It took time for full awareness to develop within the institution. |
| 2214e4cfa799-2588-4986-ac03-0cb5b33d200a | Not Translated (0%) | According to the email excerpt, individuals within the compliance group were aware and tried to alert others, including management, to no avail. | According to the email excerpt, individuals within the compliance group were aware and tried to alert others, including management, to no avail. |
| 22153151c9c8-2b8d-4e51-8ffe-06d51210ebd7 | Not Translated (0%) | “BNP Paribas agrees to plead guilty and to pay $8.9 billion for illegally processing financial transactions for countries subject to U.S. economic sanctions,” US Department of Justice, June 30, 2014. | “BNP Paribas agrees to plead guilty and to pay $8.9 billion for illegally processing financial transactions for countries subject to U.S. economic sanctions,” US Department of Justice, June 30, 2014. |
| 22169727b929-7730-46e3-84ec-3cc869b5bb09 | Not Translated (0%) | , | , |
| 2217ce7d2d71-90f2-4b34-b045-cf50bbd56ba9 | Not Translated (0%) | “Settlement agreement between the Office of Foreign Assets Control and BNP Paribas SA,” Department of the Treasury, June 30, 2014. | “Settlement agreement between the Office of Foreign Assets Control and BNP Paribas SA,” Department of the Treasury, June 30, 2014. |
| 22183d1d19e9-f25d-4d89-991e-35b3fc6d45ce | Not Translated (0%) | , | , |
| 22193e3bcee8-f605-48cb-8911-c92541e7fb16 | Not Translated (0%) | “BNP Paribas sentenced for conspiring to violate the International Emergency Economic Powers Act and the Trading with the Enemy Act,” US Department of Justice, May 1, 2015. | “BNP Paribas sentenced for conspiring to violate the International Emergency Economic Powers Act and the Trading with the Enemy Act,” US Department of Justice, May 1, 2015. |
| 222087e0fcfd-fd53-4b6c-b443-979f5a79dd00 | Not Translated (0%) | , | , |
| 222163b5df54-8963-4338-87e2-8222fb1cae92 | Not Translated (0%) | Brett Wolf, “BNP’s misuse of ‘satellite banks’ may portend future enforcement over ‘nested’ correspondent accounts,” Thomson Reuters, March 27, 2014. | Brett Wolf, “BNP’s misuse of ‘satellite banks’ may portend future enforcement over ‘nested’ correspondent accounts,” Thomson Reuters, March 27, 2014. |
| 222295d0f350-c12e-42f6-8311-c3d6c732820c | Not Translated (0%) | The following is a list of root causes of the noncompliance: | The following is a list of root causes of the noncompliance: |
| 22232c48b13a-e0f4-4746-aed2-4059e3779fb5 | Not Translated (0%) | A company prioritized commercial gain over compliance with the relevant laws. | A company prioritized commercial gain over compliance with the relevant laws. |
| 22249c495312-21e4-4308-890d-4731f57e82e5 | Not Translated (0%) | Other financial institutions were willing to participate in the scheme to disguise or omit information. | Other financial institutions were willing to participate in the scheme to disguise or omit information. |
| 2225596a9a53-6d7d-43bb-803c-6e32a3cf8fb6 | Not Translated (0%) | There was a lack of coordination between the compliance and legal areas of the bank and with the senior leaders. | There was a lack of coordination between the compliance and legal areas of the bank and with the senior leaders. |
| 2226596a9a53-6d7d-43bb-803c-6e32a3cf8fb6 | Not Translated (0%) | A cohesive compliance governance framework was also missing. | A cohesive compliance governance framework was also missing. |
| 2227b2fe258e-59b9-4a2b-99b0-6711dfecf64d | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 2228408326ee-b06d-473f-a2c4-28d8727cd66c | Not Translated (0%) | It’s important for an organization to fully understand the strength of its compliance program and business practices, who its customers are and will be, and what type of payments will flow through their accounts. | It’s important for an organization to fully understand the strength of its compliance program and business practices, who its customers are and will be, and what type of payments will flow through their accounts. |
| 22297a5ba3e6-9163-4cf2-8d86-c54aaa099564 | Not Translated (0%) | An organization’s AML and sanctions compliance program will be effective only if senior managers listen to those communicating with them. | An organization’s AML and sanctions compliance program will be effective only if senior managers listen to those communicating with them. |
| 223054266870-bc18-4790-be1c-798403d77865 | Not Translated (0%) | Sanctions are most effective when multiple jurisdictions apply the same restrictions, reducing the avenues from which noncompliant activity is likely to come. | Sanctions are most effective when multiple jurisdictions apply the same restrictions, reducing the avenues from which noncompliant activity is likely to come. |
| 2231952537f6-5eba-4527-a89e-06119a054851 | Not Translated (0%) | OFFERING DOWNSTREAM SERVICES | OFFERING DOWNSTREAM SERVICES |
| 2232c0f8595f-75f7-419d-ba65-9cfb65dc4cab | Not Translated (0%) | The BNP Paribas Bank (BNPP) case involved stripping and splitting of SWIFT messages, internal employee fraud, and downstream correspondent banking to obscure the entities involved. | The BNP Paribas Bank (BNPP) case involved stripping and splitting of SWIFT messages, internal employee fraud, and downstream correspondent banking to obscure the entities involved. |
| 2233c0f8595f-75f7-419d-ba65-9cfb65dc4cab | Not Translated (0%) | Correspondent banking arrangements carry particular risks, one being downstream services. | Correspondent banking arrangements carry particular risks, one being downstream services. |
| 2234c0f8595f-75f7-419d-ba65-9cfb65dc4cab | Not Translated (0%) | Often correspondent banks expect to process transactions on behalf of their respondent banks and their respondent banks’ customers. | Often correspondent banks expect to process transactions on behalf of their respondent banks and their respondent banks’ customers. |
| 2235c0f8595f-75f7-419d-ba65-9cfb65dc4cab | Not Translated (0%) | But if the respondent bank itself offers services to other banks that offer services to their customers and other banks, then the original correspondent has much greater risk than it foresaw when it opened an account for its respondent. | But if the respondent bank itself offers services to other banks that offer services to their customers and other banks, then the original correspondent has much greater risk than it foresaw when it opened an account for its respondent. |
| 2236555453ff-8087-4d68-888a-f518f14f780e | Not Translated (0%) | Because of this, most jurisdictions’ AML regulations require that an increased level of due diligence be applied, particularly when a correspondent bank is providing services to a respondent bank in another country. | Because of this, most jurisdictions’ AML regulations require that an increased level of due diligence be applied, particularly when a correspondent bank is providing services to a respondent bank in another country. |
| 2237555453ff-8087-4d68-888a-f518f14f780e | Not Translated (0%) | The business purpose for such arrangements is legitimate. | The business purpose for such arrangements is legitimate. |
| 2238555453ff-8087-4d68-888a-f518f14f780e | Not Translated (0%) | The correspondent bank will provide clearing services or products to its downstream correspondent that the originating bank wouldn’t be able to access on its own, such as clearing USD checks for a foreign bank, or processing funds transfers through the in-country RTGS system for a bank that doesn’t have access to that system. | The correspondent bank will provide clearing services or products to its downstream correspondent that the originating bank wouldn’t be able to access on its own, such as clearing USD checks for a foreign bank, or processing funds transfers through the in-country RTGS system for a bank that doesn’t have access to that system. |
| 22390dbe5cde-3d48-4011-b020-4564ce6b74de | Not Translated (0%) | Within such account arrangements, it is possible for the downstream respondent bank or other financial institution to process its customer’s transactions through the upstream correspondent. | Within such account arrangements, it is possible for the downstream respondent bank or other financial institution to process its customer’s transactions through the upstream correspondent. |
| 22400dbe5cde-3d48-4011-b020-4564ce6b74de | Not Translated (0%) | Under ordinary circumstances, the downstream correspondent will supply whatever identifying information is required, and legitimate transactions will be processed. | Under ordinary circumstances, the downstream correspondent will supply whatever identifying information is required, and legitimate transactions will be processed. |
| 22410dbe5cde-3d48-4011-b020-4564ce6b74de | Not Translated (0%) | However, if the downstream correspondent has a motive to evade sanctions for one of its customers, or its customer conceals information before presenting the transaction for processing, then the upstream correspondent bank is exposed. | However, if the downstream correspondent has a motive to evade sanctions for one of its customers, or its customer conceals information before presenting the transaction for processing, then the upstream correspondent bank is exposed. |
| 22420dbe5cde-3d48-4011-b020-4564ce6b74de | Not Translated (0%) | That bank will process a transaction for which it has incomplete or incorrect information, and it could unwittingly participate in sanctions evasion. | That bank will process a transaction for which it has incomplete or incorrect information, and it could unwittingly participate in sanctions evasion. |
| 2243ab6eb107-c29e-48e1-8e00-1f80c1f646cd | Not Translated (0%) | Perceived Risk — Downstream Services | Perceived Risk — Downstream Services |
| 22440208ec60-9929-46db-ada8-d2121f6b5f08 | Not Translated (0%) | In order to protect itself, a bank offering downstream correspondent services should develop an effective due diligence process for correspondent banking customers to adequately assess the risk presented by each one. | In order to protect itself, a bank offering downstream correspondent services should develop an effective due diligence process for correspondent banking customers to adequately assess the risk presented by each one. |
| 22450208ec60-9929-46db-ada8-d2121f6b5f08 | Not Translated (0%) | This risk profile may be a combination of the following factors: | This risk profile may be a combination of the following factors: |
| 2246297f7cc8-6170-41ef-9f8d-43c876a04d24 | Not Translated (0%) | The size of the downstream bank customer | The size of the downstream bank customer |
| 224720d71c2f-4377-4b8a-8192-408a93a4e229 | Not Translated (0%) | The anticipated transaction volume | The anticipated transaction volume |
| 224841b38a49-81f9-485a-8def-247281d31cfc | Not Translated (0%) | The products being accessed | The products being accessed |
| 2249c1683c2f-e084-45db-9998-179c70417839 | Not Translated (0%) | The type of customer profile the downstream bank has (that will be sending transactions through the upstream correspondent) | The type of customer profile the downstream bank has (that will be sending transactions through the upstream correspondent) |
| 22501594a876-435a-4438-88d6-7fe58eebcf47 | Not Translated (0%) | The strength of the downstream correspondent’s AML and sanctions program | The strength of the downstream correspondent’s AML and sanctions program |
| 225186dc0a87-b89d-4949-88e5-c7e67e1dd854 | Not Translated (0%) | The regulatory jurisdiction the downstream correspondent is under | The regulatory jurisdiction the downstream correspondent is under |
| 2252d01fb7df-a67b-47d0-81ae-4c9b94e5155e | Not Translated (0%) | The geographic scope of their business—both the downstream correspondent’s location and where its customers do business. | The geographic scope of their business—both the downstream correspondent’s location and where its customers do business. |
| 2253efe81bf1-620b-48b5-9fdc-29931e5e9a9f | Not Translated (0%) | By quantifying these factors up front and reviewing them regularly, the upstream correspondent will be far more likely to foresee a problem or identify unusual activity sooner rather than later. | By quantifying these factors up front and reviewing them regularly, the upstream correspondent will be far more likely to foresee a problem or identify unusual activity sooner rather than later. |
| 2254d0ff0a43-5fd0-4595-8b31-eee8a1b8ffd9 | Not Translated (0%) | Evasion Attempts by Internal Staff | Evasion Attempts by Internal Staff |
| 2255d199745b-0d2c-4664-ba89-772af625f379 | Not Translated (0%) | In addition to stripping, there are other methods that internal staff can employ to intentionally evade sanctions, such as whitelisting sanctioned individuals or entities. | In addition to stripping, there are other methods that internal staff can employ to intentionally evade sanctions, such as whitelisting sanctioned individuals or entities. |
| 22565a284184-c716-41ea-9a91-960054fd3113 | Not Translated (0%) | Sanctions programs rely on automatic screening of customer and transaction information for locations, business names, and individual names against government-provided information. | Sanctions programs rely on automatic screening of customer and transaction information for locations, business names, and individual names against government-provided information. |
| 22575a284184-c716-41ea-9a91-960054fd3113 | Not Translated (0%) | There is a high possibility of false-positive results from such automated screening. | There is a high possibility of false-positive results from such automated screening. |
| 22585a284184-c716-41ea-9a91-960054fd3113 | Not Translated (0%) | In other words, a person or entity that is not on a sanctions list gets flagged for having a similar name. | In other words, a person or entity that is not on a sanctions list gets flagged for having a similar name. |
| 22595a284184-c716-41ea-9a91-960054fd3113 | Not Translated (0%) | For efficiency’s sake, a known false positive result can be whitelisted so that personnel do not waste time reviewing the same information repeatedly. | For efficiency’s sake, a known false positive result can be whitelisted so that personnel do not waste time reviewing the same information repeatedly. |
| 22605a284184-c716-41ea-9a91-960054fd3113 | Not Translated (0%) | An employee could potentially whitelist a sanctioned business or individual, thus allowing payments and other transactions to pass through unflagged. | An employee could potentially whitelist a sanctioned business or individual, thus allowing payments and other transactions to pass through unflagged. |
| 2261255dd00a-e491-480a-8ae5-add2dbdca5ea | Not Translated (0%) | Regulators have been clear that deliberate circumvention of sanctions will be dealt with harshly, with criminal penalties, larger institutional fines, and harsher punishments. | Regulators have been clear that deliberate circumvention of sanctions will be dealt with harshly, with criminal penalties, larger institutional fines, and harsher punishments. |
| 2262255dd00a-e491-480a-8ae5-add2dbdca5ea | Not Translated (0%) | Recent enforcement actions show that this is true. | Recent enforcement actions show that this is true. |
| 226327a2d6e1-9744-42c2-be1d-ba4336404e17 | Not Translated (0%) | Organizations should have an internal escalation process for any suspicious employee behavior, and employees should be aware of how to follow this process. | Organizations should have an internal escalation process for any suspicious employee behavior, and employees should be aware of how to follow this process. |
| 226436a3d6b9-1a75-482b-9f1f-2b70e4a2fe7b | Not Translated (0%) | Trade-Related Evasion Methods | Trade-Related Evasion Methods |
| 22655411ace7-7691-44b0-bf89-f3f799126185 | Not Translated (0%) | Various tactics are used to evade trade restrictions or embargoes. | Various tactics are used to evade trade restrictions or embargoes. |
| 22665411ace7-7691-44b0-bf89-f3f799126185 | Not Translated (0%) | These tactics can be used on their own or in combination with other tactics. | These tactics can be used on their own or in combination with other tactics. |
| 226741972d9c-fb01-4b90-9efa-29cafa65a005 | Not Translated (0%) | CONCEALMENT | CONCEALMENT |
| 2268e6bfb379-cece-4086-bf77-828ee842da4d | Not Translated (0%) | Sanctions evaders depend on concealment to avoid sanctions, fines, and scandal. | Sanctions evaders depend on concealment to avoid sanctions, fines, and scandal. |
| 2269e6bfb379-cece-4086-bf77-828ee842da4d | Not Translated (0%) | They may disguise the origin point of certain goods or funds. | They may disguise the origin point of certain goods or funds. |
| 2270e6bfb379-cece-4086-bf77-828ee842da4d | Not Translated (0%) | Or they may hide the identity of the receiver of goods. | Or they may hide the identity of the receiver of goods. |
| 2271569525a0-d268-4fcd-9e77-7ec56caadf84 | Not Translated (0%) | Concealing an End User’s Identity | Concealing an End User’s Identity |
| 22727fedd724-8338-464c-be18-6673cd898a29 | Not Translated (0%) | It’s possible for sanctions evaders to structure transactions so that the exporter and others involved in processing a shipment are unaware of the ultimate destination, user, and use for the product. | It’s possible for sanctions evaders to structure transactions so that the exporter and others involved in processing a shipment are unaware of the ultimate destination, user, and use for the product. |
| 22737fedd724-8338-464c-be18-6673cd898a29 | Not Translated (0%) | In these cases, the intent may be to conceal the identity of the ultimate purchaser of a given item. | In these cases, the intent may be to conceal the identity of the ultimate purchaser of a given item. |
| 22747fedd724-8338-464c-be18-6673cd898a29 | Not Translated (0%) | Or, in the case of certain dual-use products, the intent may be to conceal the manner in which the products will be used. | Or, in the case of certain dual-use products, the intent may be to conceal the manner in which the products will be used. |
| 22756a738498-c191-479b-907f-a50977ab7c06 | Not Translated (0%) | Sanctions evaders have different ways to conceal the end user’s identity or the product’s end use. | Sanctions evaders have different ways to conceal the end user’s identity or the product’s end use. |
| 22766a738498-c191-479b-907f-a50977ab7c06 | Not Translated (0%) | These methods include the following: | These methods include the following: |
| 22770629b91b-7d64-484c-b46f-b3ebdc910776 | Not Translated (0%) | The sanctions evader may use a straw buyer in another jurisdiction to buy the merchandise and then complete a separate shipment or purchase after the export has occurred. | The sanctions evader may use a straw buyer in another jurisdiction to buy the merchandise and then complete a separate shipment or purchase after the export has occurred. |
| 2278e244eb8e-4ea3-405d-9fba-89f9f56180df | Not Translated (0%) | The evader may falsify the name of the purchaser or end user to avoid detection. | The evader may falsify the name of the purchaser or end user to avoid detection. |
| 227918b3e22b-6037-4f40-b3a0-386c13a31269 | Not Translated (0%) | The evader may falsely state the purpose or intended use of the item in purchase orders, transport documentation, and other documents related to the transaction. | The evader may falsely state the purpose or intended use of the item in purchase orders, transport documentation, and other documents related to the transaction. |
| 2280ba05ffc7-74da-4183-ba63-40941cb9591e | Not Translated (0%) | Arms, ammunition, and certain other sensitive merchandise require an end user certificate or attestation that the goods will not be further sold or shipped. | Arms, ammunition, and certain other sensitive merchandise require an end user certificate or attestation that the goods will not be further sold or shipped. |
| 2281ba05ffc7-74da-4183-ba63-40941cb9591e | Not Translated (0%) | This certificate or attestation is subject to verification by regulatory authorities. | This certificate or attestation is subject to verification by regulatory authorities. |
| 2282ba05ffc7-74da-4183-ba63-40941cb9591e | Not Translated (0%) | If the purchaser’s intent is to defraud, however, this certificate will simply be another document with false information. | If the purchaser’s intent is to defraud, however, this certificate will simply be another document with false information. |
| 228337d44d2e-2dd5-49c3-a6e3-7809435d73e1 | Not Translated (0%) | For trade-based transactions, which include more documentation, concealment may take many forms: | For trade-based transactions, which include more documentation, concealment may take many forms: |
| 22849a27cb00-c43d-4762-a9e6-0ca1874299d2 | Not Translated (0%) | Obscuring the origin of merchandise | Obscuring the origin of merchandise |
| 22854d329420-aaa5-4039-bed7-3b765105164d | Not Translated (0%) | Obscuring the path of a vessel | Obscuring the path of a vessel |
| 2286a2dbe635-fd5f-4582-8503-86d87ac6b07f | Not Translated (0%) | Transferring letters of credit | Transferring letters of credit |
| 228766a870d0-ffdc-4a29-9018-cadb877629ce | Not Translated (0%) | Removing the names of financial institutions involved in the backing instrument, whether through careful construction of alternate information or falsification of the documents themselves | Removing the names of financial institutions involved in the backing instrument, whether through careful construction of alternate information or falsification of the documents themselves |
| 228879eba078-54d3-4f39-a661-1d9505d05fef | Not Translated (0%) | TRANSSHIPMENT | TRANSSHIPMENT |
| 2289ec7e8f44-5f5a-4a32-a8f2-ec436bef5593 | Not Translated (0%) | Another evasion tactic is the transshipment of goods. | Another evasion tactic is the transshipment of goods. |
| 2290ec7e8f44-5f5a-4a32-a8f2-ec436bef5593 | Not Translated (0%) | Transshipment is the delivery of goods or containers to an intermediate destination and then on to a further or final destination. | Transshipment is the delivery of goods or containers to an intermediate destination and then on to a further or final destination. |
| 2291ec7e8f44-5f5a-4a32-a8f2-ec436bef5593 | Not Translated (0%) | It can also mean a change of carrier or vessel. | It can also mean a change of carrier or vessel. |
| 229248939570-77e0-401e-ba23-86a51ecfa804 | Not Translated (0%) | Transshipment can be a necessary step to reach the destination, as with a port inland on a river. | Transshipment can be a necessary step to reach the destination, as with a port inland on a river. |
| 229348939570-77e0-401e-ba23-86a51ecfa804 | Not Translated (0%) | In this example, an ocean vessel may not be able to navigate river waters, making transshipment necessary by a smaller vessel, a truck, or a train. | In this example, an ocean vessel may not be able to navigate river waters, making transshipment necessary by a smaller vessel, a truck, or a train. |
| 229448939570-77e0-401e-ba23-86a51ecfa804 | Not Translated (0%) | For this reason, transshipment is not always a sign of sanctions evasion. | For this reason, transshipment is not always a sign of sanctions evasion. |
| 22955ef452b8-53fe-42be-8c9b-55e1f6f5244f | Not Translated (0%) | A number of jurisdictions have strict regulations concerning the transshipment or transit of goods through sanctioned jurisdictions. | A number of jurisdictions have strict regulations concerning the transshipment or transit of goods through sanctioned jurisdictions. |
| 22965ef452b8-53fe-42be-8c9b-55e1f6f5244f | Not Translated (0%) | Under some sanctions restrictions, goods that are transshipped to a sanctioned jurisdiction are then treated as if they originated from that jurisdiction. | Under some sanctions restrictions, goods that are transshipped to a sanctioned jurisdiction are then treated as if they originated from that jurisdiction. |
| 22975ef452b8-53fe-42be-8c9b-55e1f6f5244f | Not Translated (0%) | For example, under the OFAC Iran sanctions, no goods can be imported into the United States if they are transshipped by way of Iran without prior authorization. | For example, under the OFAC Iran sanctions, no goods can be imported into the United States if they are transshipped by way of Iran without prior authorization. |
| 229862e02868-6674-44f4-b6de-9756a9ad5d6d | Not Translated (0%) | Transshipment can be difficult to spot, regardless of whether the transshipped items are tiny (such as machine parts) or large (such as machine guns). | Transshipment can be difficult to spot, regardless of whether the transshipped items are tiny (such as machine parts) or large (such as machine guns). |
| 229962e02868-6674-44f4-b6de-9756a9ad5d6d | Not Translated (0%) | One well-known example involved transshipping an aircraft to Iran. | One well-known example involved transshipping an aircraft to Iran. |
| 230062e02868-6674-44f4-b6de-9756a9ad5d6d | Not Translated (0%) | The case involved attempted concealment through a freight forwarder. | The case involved attempted concealment through a freight forwarder. |
| 230162e02868-6674-44f4-b6de-9756a9ad5d6d | Not Translated (0%) | Ali Asghar Manzarpour was the director of Preston Technical Services, Ltd. In July 2007, the US Bureau of Industry and Security (BIS) charged him with three violations of the Export Administration Regulations, issued under the Export Administration Act of 1979, as amended. | Ali Asghar Manzarpour was the director of Preston Technical Services, Ltd. In July 2007, the US Bureau of Industry and Security (BIS) charged him with three violations of the Export Administration Regulations, issued under the Export Administration Act of 1979, as amended. |
| 230262e02868-6674-44f4-b6de-9756a9ad5d6d | Not Translated (0%) | The charges alleged that on or about April 28, 2004, Manzarpour coordinated the export of a single-engine aircraft to Iran without the required export authorization. | The charges alleged that on or about April 28, 2004, Manzarpour coordinated the export of a single-engine aircraft to Iran without the required export authorization. |
| 2303ff64b4e9-efee-4b5f-9792-bbc4b1fe5da4 | Not Translated (0%) | Manzarpour ordered a freight-forwarding company to ship the aircraft from the United States to the United Kingdom. | Manzarpour ordered a freight-forwarding company to ship the aircraft from the United States to the United Kingdom. |
| 2304ff64b4e9-efee-4b5f-9792-bbc4b1fe5da4 | Not Translated (0%) | He knew Iran was the ultimate destination. | He knew Iran was the ultimate destination. |
| 2305ff64b4e9-efee-4b5f-9792-bbc4b1fe5da4 | Not Translated (0%) | Manzarpour then instructed the freight forwarder to transship the item to Iran, but the shipment was stopped before leaving the United Kingdom. | Manzarpour then instructed the freight forwarder to transship the item to Iran, but the shipment was stopped before leaving the United Kingdom. |
| 2306ff64b4e9-efee-4b5f-9792-bbc4b1fe5da4 | Not Translated (0%) | According to section 560.204 of the Iranian Transactions and Sanctions Regulations maintained by OFAC, the export of an item to a third country intended for transshipment to Iran is a transaction that requires authorization from OFAC. | According to section 560.204 of the Iranian Transactions and Sanctions Regulations maintained by OFAC, the export of an item to a third country intended for transshipment to Iran is a transaction that requires authorization from OFAC. |
| 2307ff64b4e9-efee-4b5f-9792-bbc4b1fe5da4 | Not Translated (0%) | Manzarpour did not get OFAC authorization for the export. | Manzarpour did not get OFAC authorization for the export. |
| 2308ff64b4e9-efee-4b5f-9792-bbc4b1fe5da4 | Not Translated (0%) | BIS charged that Manzarpour violated the regulations. | BIS charged that Manzarpour violated the regulations. |
| 2309eee33e74-c374-40c7-8fbe-9f0f47f63ca8 | Not Translated (0%) | 73 FR 12073. | 73 FR 12073. |
| 23103d43e437-dbd8-4412-a3ce-f98ede04102e | Not Translated (0%) | Manzarpour violated the regulations by buying the plane and intending to export it from the United States to Iran through the United Kingdom. | Manzarpour violated the regulations by buying the plane and intending to export it from the United States to Iran through the United Kingdom. |
| 23113d43e437-dbd8-4412-a3ce-f98ede04102e | Not Translated (0%) | He planned to do this even though he knew that he did not have authorization from the US government and that doing so would violate the regulations. | He planned to do this even though he knew that he did not have authorization from the US government and that doing so would violate the regulations. |
| 23123d43e437-dbd8-4412-a3ce-f98ede04102e | Not Translated (0%) | Manzarpour told UK customs authorities that he was aware the plane could not be exported from the United States to Iran. | Manzarpour told UK customs authorities that he was aware the plane could not be exported from the United States to Iran. |
| 23133d43e437-dbd8-4412-a3ce-f98ede04102e | Not Translated (0%) | He acted through his companies, Preston Technical Services Ltd.–UK and Baronmode, Ltd.–UK. | He acted through his companies, Preston Technical Services Ltd.–UK and Baronmode, Ltd.–UK. |
| 23143be25fc5-c23e-49e8-a0d4-7471a218e177 | Not Translated (0%) | The US government charged Manzarpour with acting with intent to evade the regulations. | The US government charged Manzarpour with acting with intent to evade the regulations. |
| 23153be25fc5-c23e-49e8-a0d4-7471a218e177 | Not Translated (0%) | An Administrative Law Judge of the US Coast Guard issued a final ruling in February 2008 upholding the BIS recommendation that Manzarpour be denied export privileges under the regulations for 20 years. | An Administrative Law Judge of the US Coast Guard issued a final ruling in February 2008 upholding the BIS recommendation that Manzarpour be denied export privileges under the regulations for 20 years. |
| 2316d5a9eef4-1e26-4243-a7d2-f281c609f2fd | Not Translated (0%) | Transshipment | Transshipment |
| 2317555caaee-957f-4ec3-8b11-0c00b9a90bc6 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 2318555caaee-957f-4ec3-8b11-0c00b9a90bc6 | Not Translated (0%) | BLUE SKY BLUE SEA, 2017 | BLUE SKY BLUE SEA, 2017 |
| 2319332ea28e-1afa-4b2b-b2f4-03c7208088de | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 2320f87e1c12-1c00-4cf6-81a8-ac59839dded9 | Not Translated (0%) | In August 2017, OFAC announced a $518,063 settlement with Blue Sky Blue Sea, Inc. The company was doing business as American Export Lines and International Shipping Company (USA) of Los Angeles, California, referred to as AEL. | In August 2017, OFAC announced a $518,063 settlement with Blue Sky Blue Sea, Inc. The company was doing business as American Export Lines and International Shipping Company (USA) of Los Angeles, California, referred to as AEL. |
| 2321f87e1c12-1c00-4cf6-81a8-ac59839dded9 | Not Translated (0%) | The agreement settled AEL’s potential civil liability for 140 apparent violations of the Iranian Transactions and Sanctions Regulations (ITSR). | The agreement settled AEL’s potential civil liability for 140 apparent violations of the Iranian Transactions and Sanctions Regulations (ITSR). |
| 2322fd18f3de-79ea-4ee3-a6c8-3b8dde6eee64 | Not Translated (0%) | Between April 2010 and June 2012, AEL appears to have violated the ITSR by transshipping used and junked cars and parts from the United States through Iran to Afghanistan on 140 occasions. | Between April 2010 and June 2012, AEL appears to have violated the ITSR by transshipping used and junked cars and parts from the United States through Iran to Afghanistan on 140 occasions. |
| 2323fd18f3de-79ea-4ee3-a6c8-3b8dde6eee64 | Not Translated (0%) | Although there was an OFAC compliance program in place at the time, AEL failed to disclose to OFAC in advance that it was planning to ship these goods through Iran. | Although there was an OFAC compliance program in place at the time, AEL failed to disclose to OFAC in advance that it was planning to ship these goods through Iran. |
| 2324716aaefc-f216-4923-9d32-04e007dab353 | Not Translated (0%) | AEL did not self-disclose the violations to OFAC. | AEL did not self-disclose the violations to OFAC. |
| 2325716aaefc-f216-4923-9d32-04e007dab353 | Not Translated (0%) | Despite this, the company addressed the violations internally before the OFAC investigation began. | Despite this, the company addressed the violations internally before the OFAC investigation began. |
| 2326716aaefc-f216-4923-9d32-04e007dab353 | Not Translated (0%) | AEL did this by amending its policy to address the gap and ceasing any such transshipments. | AEL did this by amending its policy to address the gap and ceasing any such transshipments. |
| 2327eb29388d-0f05-4fe8-9ede-0528d10ad2c8 | Not Translated (0%) | The United States investigation determined that AEL’s president and co-owner knew of and approved the transshipments. | The United States investigation determined that AEL’s president and co-owner knew of and approved the transshipments. |
| 2328eb29388d-0f05-4fe8-9ede-0528d10ad2c8 | Not Translated (0%) | The goods didn’t have an end-use or an end-user in Iran, which was a mitigating factor. | The goods didn’t have an end-use or an end-user in Iran, which was a mitigating factor. |
| 2329eb29388d-0f05-4fe8-9ede-0528d10ad2c8 | Not Translated (0%) | However, the government concluded that AEL still violated the sanctions. | However, the government concluded that AEL still violated the sanctions. |
| 2330eb29388d-0f05-4fe8-9ede-0528d10ad2c8 | Not Translated (0%) | By making the transshipments, AEL enriched the economy of Iran and demonstrated a reckless disregard for sanctions law. | By making the transshipments, AEL enriched the economy of Iran and demonstrated a reckless disregard for sanctions law. |
| 23315e8c5740-9f1a-465a-8b21-f8a0ec1bfb3f | Not Translated (0%) | “Settlement agreement between the U.S. Department of the Treasury’s Office of Foreign Assets Control and Blue Sky Blue Sea, Inc., doing business as American Export Lines and International Shipping Company (USA),” US Department of the Treasury, August 17, 2017. | “Settlement agreement between the U.S. Department of the Treasury’s Office of Foreign Assets Control and Blue Sky Blue Sea, Inc., doing business as American Export Lines and International Shipping Company (USA),” US Department of the Treasury, August 17, 2017. |
| 2332ed2d3cb0-6208-488e-89cc-3caabb41dc7f | Not Translated (0%) | , | , |
| 2333c9c2d78d-aaa3-40dd-a87f-f9e809b5c1f2 | Not Translated (0%) | US Department of the Treasury, Enforcement Information for August 17, 2017. | US Department of the Treasury, Enforcement Information for August 17, 2017. |
| 2334b9409e02-ee73-4fe4-82c9-da776711571b | Not Translated (0%) | , | , |
| 2335e23c929e-144a-4d38-9a01-2619d588df0b | Not Translated (0%) | Michael O’Kane, “OFAC fines American Export Lines for violating U.S. sanctions on Iran,” EuropeanSanctions.com, August 18, 2017. | Michael O’Kane, “OFAC fines American Export Lines for violating U.S. sanctions on Iran,” EuropeanSanctions.com, August 18, 2017. |
| 233635233cae-2a15-4e05-bc0f-7990d67b2389 | Not Translated (0%) | The following is a list of root causes of the noncompliance: | The following is a list of root causes of the noncompliance: |
| 233780c35dff-df81-468f-a960-97fd62637e81 | Not Translated (0%) | AEL’s OFAC compliance program was ineffective. | AEL’s OFAC compliance program was ineffective. |
| 233880c35dff-df81-468f-a960-97fd62637e81 | Not Translated (0%) | Although a program was in place, it was either inadequate and didn’t address the issue of transshipment through Iran, or individuals could override it without difficulty or consequence. | Although a program was in place, it was either inadequate and didn’t address the issue of transshipment through Iran, or individuals could override it without difficulty or consequence. |
| 23393185e776-c59b-4d9c-bb6f-c872660273fe | Not Translated (0%) | AEL lacked a compliance culture. | AEL lacked a compliance culture. |
| 23403185e776-c59b-4d9c-bb6f-c872660273fe | Not Translated (0%) | Management decided that compliance with this regulation was not a priority. | Management decided that compliance with this regulation was not a priority. |
| 2341ed672a87-7e4e-4ffe-9e43-72f4f7252f01 | Not Translated (0%) | AEL and its employees did not fully understand current sanctions regulations. | AEL and its employees did not fully understand current sanctions regulations. |
| 2342da43bd49-12f2-4b13-ab3b-b5c28196b25d | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 2343283c4df2-87ce-4707-8a31-87af1f17f5e4 | Not Translated (0%) | It is vital for an organization to understand the implications of all restrictions that could affect its business and its customers. | It is vital for an organization to understand the implications of all restrictions that could affect its business and its customers. |
| 23440f3c0463-83cd-42f7-8a88-484ee03b02ce | Not Translated (0%) | When an organization uncovers a problem with its compliance, addressing it internally isn’t always enough. | When an organization uncovers a problem with its compliance, addressing it internally isn’t always enough. |
| 23450f3c0463-83cd-42f7-8a88-484ee03b02ce | Not Translated (0%) | Had AEL completed a self-disclosure of this behavior to OFAC, the result would probably have been a lower fine or no fine at all. | Had AEL completed a self-disclosure of this behavior to OFAC, the result would probably have been a lower fine or no fine at all. |
| 2346b32cfcbe-0733-4fd2-9326-1d49f06d6541 | Not Translated (0%) | An organization must ensure its sanctions compliance program is current and complete. | An organization must ensure its sanctions compliance program is current and complete. |
| 2347b32cfcbe-0733-4fd2-9326-1d49f06d6541 | Not Translated (0%) | It should keep track of any and all changes to laws and sanctions and adapt its program accordingly. | It should keep track of any and all changes to laws and sanctions and adapt its program accordingly. |
| 2348b32cfcbe-0733-4fd2-9326-1d49f06d6541 | Not Translated (0%) | These measures will prevent any unintentional violations. | These measures will prevent any unintentional violations. |
| 234934b92fa9-2b21-411d-805c-9a4fe296b0bd | Not Translated (0%) | Evasion through Consolidation of Goods | Evasion through Consolidation of Goods |
| 235013a06319-81a1-424e-99b9-bf8caeca052d | Not Translated (0%) | There are a few types of transshipment evasion tactics. | There are a few types of transshipment evasion tactics. |
| 235113a06319-81a1-424e-99b9-bf8caeca052d | Not Translated (0%) | Some evaders hide prohibited or restricted goods through consolidation. | Some evaders hide prohibited or restricted goods through consolidation. |
| 235213a06319-81a1-424e-99b9-bf8caeca052d | Not Translated (0%) | In other words, they group small shipments into one larger one, or they mix restricted items with other goods and do not declare those restricted items in shipping documentation. | In other words, they group small shipments into one larger one, or they mix restricted items with other goods and do not declare those restricted items in shipping documentation. |
| 235369fc01f5-87a3-4840-a3f7-9f77c0956b58 | Not Translated (0%) | The Internet has made it somewhat easier to make business contacts around the world. | The Internet has made it somewhat easier to make business contacts around the world. |
| 235469fc01f5-87a3-4840-a3f7-9f77c0956b58 | Not Translated (0%) | However, the practice of evading sanctions by hiding a restricted shipment within an unrestricted one, or hiding a small amount of contraband among innocuous goods, has existed for centuries. | However, the practice of evading sanctions by hiding a restricted shipment within an unrestricted one, or hiding a small amount of contraband among innocuous goods, has existed for centuries. |
| 235569fc01f5-87a3-4840-a3f7-9f77c0956b58 | Not Translated (0%) | As long as there have been smugglers, there has been consolidation. | As long as there have been smugglers, there has been consolidation. |
| 235622390919-346b-4c39-a258-aa601e4ea0ea | Not Translated (0%) | When sanctions evaders ship something they want to go unnoticed or undetected, the key is to avoid or minimize inspection. | When sanctions evaders ship something they want to go unnoticed or undetected, the key is to avoid or minimize inspection. |
| 235722390919-346b-4c39-a258-aa601e4ea0ea | Not Translated (0%) | For example, if the goods disguising the restricted shipment are heavy, difficult to move, or messy in some way, they may better conceal what evaders don’t want the customs officials to see. | For example, if the goods disguising the restricted shipment are heavy, difficult to move, or messy in some way, they may better conceal what evaders don’t want the customs officials to see. |
| 235822390919-346b-4c39-a258-aa601e4ea0ea | Not Translated (0%) | Disguising goods may include live plants or crates of vegetables that are fragile and would break down with too close inspection. | Disguising goods may include live plants or crates of vegetables that are fragile and would break down with too close inspection. |
| 235922390919-346b-4c39-a258-aa601e4ea0ea | Not Translated (0%) | Imagine a shipment of machine parts in small boxes, concealed beneath pallets of scrap metal or gravel. | Imagine a shipment of machine parts in small boxes, concealed beneath pallets of scrap metal or gravel. |
| 236022390919-346b-4c39-a258-aa601e4ea0ea | Not Translated (0%) | It would be extremely difficult for inspectors to move those pallets and detect the restricted goods. | It would be extremely difficult for inspectors to move those pallets and detect the restricted goods. |
| 236182fa2eff-8816-4ec9-8836-f9e4ac2e63a6 | Not Translated (0%) | Technology made consolidation easier in some ways. | Technology made consolidation easier in some ways. |
| 236282fa2eff-8816-4ec9-8836-f9e4ac2e63a6 | Not Translated (0%) | The anonymous and often untraceable parts of the Internet called the Dark Web can make it easier for sanctions evaders to advertise their willingness to engage in activity that breaks the law. | The anonymous and often untraceable parts of the Internet called the Dark Web can make it easier for sanctions evaders to advertise their willingness to engage in activity that breaks the law. |
| 236382fa2eff-8816-4ec9-8836-f9e4ac2e63a6 | Not Translated (0%) | However, sanctions evasion still requires a level of trust between parties. | However, sanctions evasion still requires a level of trust between parties. |
| 236482fa2eff-8816-4ec9-8836-f9e4ac2e63a6 | Not Translated (0%) | This trust can only be established through contact and time or through an introduction from a trusted individual. | This trust can only be established through contact and time or through an introduction from a trusted individual. |
| 23658031bf9f-c732-4bb3-a9f5-5bd159ab46cc | Not Translated (0%) | In other ways, technology has made consolidation more difficult. | In other ways, technology has made consolidation more difficult. |
| 23668031bf9f-c732-4bb3-a9f5-5bd159ab46cc | Not Translated (0%) | Advances in merchandise marking, tracking, and technology have enhanced the security of goods in transport. | Advances in merchandise marking, tracking, and technology have enhanced the security of goods in transport. |
| 23678031bf9f-c732-4bb3-a9f5-5bd159ab46cc | Not Translated (0%) | These advances leave fewer openings for manipulation of the system. | These advances leave fewer openings for manipulation of the system. |
| 2368a1c8a44a-9a70-4827-8edd-47d69e35a5f0 | Not Translated (0%) | There is potential for an increase in shipment consolidation to evade sanctions. | There is potential for an increase in shipment consolidation to evade sanctions. |
| 2369a1c8a44a-9a70-4827-8edd-47d69e35a5f0 | Not Translated (0%) | Certain goods will always be subject to consolidation due to global restrictions; weapons are a prime example. | Certain goods will always be subject to consolidation due to global restrictions; weapons are a prime example. |
| 2370a1c8a44a-9a70-4827-8edd-47d69e35a5f0 | Not Translated (0%) | Still, advances in technology for goods tracking, life cycle monitoring of merchandise, and government use of technology in the global shipment arena will present new challenges to the bad actors. | Still, advances in technology for goods tracking, life cycle monitoring of merchandise, and government use of technology in the global shipment arena will present new challenges to the bad actors. |
| 2371c942f8a9-b5b1-41be-a94e-6f448082342b | Not Translated (0%) | One example of evasion through consolidation is the case of David Wu. | One example of evasion through consolidation is the case of David Wu. |
| 2372c942f8a9-b5b1-41be-a94e-6f448082342b | Not Translated (0%) | In August 2015, the US Department of Justice sentenced him to 10 months of imprisonment for violating restrictions relating to the export of arms equipment. | In August 2015, the US Department of Justice sentenced him to 10 months of imprisonment for violating restrictions relating to the export of arms equipment. |
| 2373c942f8a9-b5b1-41be-a94e-6f448082342b | Not Translated (0%) | Wu tried to arrange for the purchase of this equipment in the United States in order to ship it to China. | Wu tried to arrange for the purchase of this equipment in the United States in order to ship it to China. |
| 2374c942f8a9-b5b1-41be-a94e-6f448082342b | Not Translated (0%) | He planned to conceal the equipment in another shipment that contained construction supplies for building houses. | He planned to conceal the equipment in another shipment that contained construction supplies for building houses. |
| 237551904991-9296-4c08-86cb-6c14bd7bf946 | Not Translated (0%) | Using a Neutral Jurisdiction or Country | Using a Neutral Jurisdiction or Country |
| 2376e4650fa9-c65d-46b9-9f1c-5294a21a6453 | Not Translated (0%) | Another evasion tactic is to arrange for goods to be shipped, transferred, or otherwise sent onward from a “neutral” transit jurisdiction. | Another evasion tactic is to arrange for goods to be shipped, transferred, or otherwise sent onward from a “neutral” transit jurisdiction. |
| 2377e4650fa9-c65d-46b9-9f1c-5294a21a6453 | Not Translated (0%) | These tend to be countries where export controls are perceived to be more robust and reliable. | These tend to be countries where export controls are perceived to be more robust and reliable. |
| 2378e4650fa9-c65d-46b9-9f1c-5294a21a6453 | Not Translated (0%) | This tactic can provide a false sense of security because it’s assumed that local authorities have checked and approved goods shipped from these locations. | This tactic can provide a false sense of security because it’s assumed that local authorities have checked and approved goods shipped from these locations. |
| 2379e4650fa9-c65d-46b9-9f1c-5294a21a6453 | Not Translated (0%) | Using this type of transit jurisdiction can help obscure the origin of goods. | Using this type of transit jurisdiction can help obscure the origin of goods. |
| 2380e4650fa9-c65d-46b9-9f1c-5294a21a6453 | Not Translated (0%) | It can also help evaders escape detection by sanctions screening tools that might otherwise raise a red flag about the jurisdiction involved. | It can also help evaders escape detection by sanctions screening tools that might otherwise raise a red flag about the jurisdiction involved. |
| 2381bf600a92-914c-4a46-9312-c0a2e93d0424 | Not Translated (0%) | An example of attempting to use a neutral jurisdiction is the case of Syed Vaqar Ashraf. | An example of attempting to use a neutral jurisdiction is the case of Syed Vaqar Ashraf. |
| 2382bf600a92-914c-4a46-9312-c0a2e93d0424 | Not Translated (0%) | In 2016, Ashraf was sentenced to 33 months of imprisonment for trying to ship restricted goods from the United States without a license. | In 2016, Ashraf was sentenced to 33 months of imprisonment for trying to ship restricted goods from the United States without a license. |
| 2383bf600a92-914c-4a46-9312-c0a2e93d0424 | Not Translated (0%) | He arranged for the goods to be shipped to Belgium. | He arranged for the goods to be shipped to Belgium. |
| 2384bf600a92-914c-4a46-9312-c0a2e93d0424 | Not Translated (0%) | The goods were then to be shipped to Pakistan for use by Pakistan’s military. | The goods were then to be shipped to Pakistan for use by Pakistan’s military. |
| 2385bf600a92-914c-4a46-9312-c0a2e93d0424 | Not Translated (0%) | Belgian police caught Ashraf before he was able to do so. | Belgian police caught Ashraf before he was able to do so. |
| 23865fe666e6-2a42-4ce5-b7de-1572ac7f6def | Not Translated (0%) | Switching Cargo on the Open Sea | Switching Cargo on the Open Sea |
| 23876bf5a68f-62a5-4e03-9113-ec49935df6fe | Not Translated (0%) | Ocean cargo vessels must maintain detailed records of their route. | Ocean cargo vessels must maintain detailed records of their route. |
| 23886bf5a68f-62a5-4e03-9113-ec49935df6fe | Not Translated (0%) | They must specify which ports they stopped at and where they loaded or offloaded cargo. | They must specify which ports they stopped at and where they loaded or offloaded cargo. |
| 23896bf5a68f-62a5-4e03-9113-ec49935df6fe | Not Translated (0%) | How do these vessels deliver cargo to a sanctioned destination without leaving a record of their presence? | How do these vessels deliver cargo to a sanctioned destination without leaving a record of their presence? |
| 2390dbfb1861-9031-4a66-83be-dc6de2b029ee | Not Translated (0%) | A ship from the selling country will arrange with a ship from the sanctioned location to meet in international waters, beyond the jurisdiction of any of the surrounding countries’ coast guard or naval forces. | A ship from the selling country will arrange with a ship from the sanctioned location to meet in international waters, beyond the jurisdiction of any of the surrounding countries’ coast guard or naval forces. |
| 2391dbfb1861-9031-4a66-83be-dc6de2b029ee | Not Translated (0%) | Then the ships will transfer the cargo on the open water. | Then the ships will transfer the cargo on the open water. |
| 2392dbfb1861-9031-4a66-83be-dc6de2b029ee | Not Translated (0%) | The goods have documentation bearing a false destination and perhaps a false buyer. | The goods have documentation bearing a false destination and perhaps a false buyer. |
| 2393dbfb1861-9031-4a66-83be-dc6de2b029ee | Not Translated (0%) | Or they may not be listed on the sending ship’s cargo manifest at all in order to avoid questions. | Or they may not be listed on the sending ship’s cargo manifest at all in order to avoid questions. |
| 2394dbfb1861-9031-4a66-83be-dc6de2b029ee | Not Translated (0%) | There may also be a false entry showing delivery at a false destination. | There may also be a false entry showing delivery at a false destination. |
| 2395dbfb1861-9031-4a66-83be-dc6de2b029ee | Not Translated (0%) | To avoid electronic traces of the meeting, both ships will turn off their Automatic Identification System (AIS) transponders, a process known as “loitering.” | To avoid electronic traces of the meeting, both ships will turn off their Automatic Identification System (AIS) transponders, a process known as “loitering.” |
| 2396dbfb1861-9031-4a66-83be-dc6de2b029ee | Not Translated (0%) | This means details of their precise location are not transmitted and do not alert any authorities to their coordinated meeting. | This means details of their precise location are not transmitted and do not alert any authorities to their coordinated meeting. |
| 2397f7fabd9d-ed78-4a89-8d92-b73d51c8ff2f | Not Translated (0%) | In the past, transponders measured only the amount of time the transponder was off. | In the past, transponders measured only the amount of time the transponder was off. |
| 2398f7fabd9d-ed78-4a89-8d92-b73d51c8ff2f | Not Translated (0%) | In some cases, ships could blame a lack of transponder information on their route and a poor signal. | In some cases, ships could blame a lack of transponder information on their route and a poor signal. |
| 2399f7fabd9d-ed78-4a89-8d92-b73d51c8ff2f | Not Translated (0%) | However, this method of trying to remain unseen may be coming to an end. | However, this method of trying to remain unseen may be coming to an end. |
| 2400f7fabd9d-ed78-4a89-8d92-b73d51c8ff2f | Not Translated (0%) | International surveillance satellites record images of ships and provide analysis to government agencies. | International surveillance satellites record images of ships and provide analysis to government agencies. |
| 2401f7fabd9d-ed78-4a89-8d92-b73d51c8ff2f | Not Translated (0%) | Governments around the globe are beginning to use such surveillance methods to track oceangoing traffic from sanctioned countries, such as Iran and North Korea. | Governments around the globe are beginning to use such surveillance methods to track oceangoing traffic from sanctioned countries, such as Iran and North Korea. |
| 2402f7fabd9d-ed78-4a89-8d92-b73d51c8ff2f | Not Translated (0%) | Governments can identify when ships leave their ports, where they head, and whom they meet. | Governments can identify when ships leave their ports, where they head, and whom they meet. |
| 2403f7fabd9d-ed78-4a89-8d92-b73d51c8ff2f | Not Translated (0%) | It is even possible to analyze the direction of cargo transfer based on shadows of the cargo ships that show how low they sit in the water. | It is even possible to analyze the direction of cargo transfer based on shadows of the cargo ships that show how low they sit in the water. |
| 2404f1b1d1fd-3d9c-4e09-97b1-5b0140202c97 | Not Translated (0%) | International Efforts to Detect Loitering | International Efforts to Detect Loitering |
| 2405a9edddeb-5fed-4e16-a6df-7475f43b5f5c | Not Translated (0%) | A transponder signals a ship’s location. | A transponder signals a ship’s location. |
| 2406a9edddeb-5fed-4e16-a6df-7475f43b5f5c | Not Translated (0%) | It also conveys its course, speed, and cargo, and it reveals in what country the ship is registered, along with a great deal of other information. | It also conveys its course, speed, and cargo, and it reveals in what country the ship is registered, along with a great deal of other information. |
| 2407a9edddeb-5fed-4e16-a6df-7475f43b5f5c | Not Translated (0%) | Ships use transponders to prevent collisions and to indicate their location in case of emergency. | Ships use transponders to prevent collisions and to indicate their location in case of emergency. |
| 2408a9edddeb-5fed-4e16-a6df-7475f43b5f5c | Not Translated (0%) | Governments insist that ships use transponders to make smuggling more difficult. | Governments insist that ships use transponders to make smuggling more difficult. |
| 2409a9edddeb-5fed-4e16-a6df-7475f43b5f5c | Not Translated (0%) | However, some cargo ships turn off their transponders to avoid revealing what their cargo is and where they are headed, a process known as “loitering.” | However, some cargo ships turn off their transponders to avoid revealing what their cargo is and where they are headed, a process known as “loitering.” |
| 2410230a5f38-9415-4310-87af-517cc3f16467 | Not Translated (0%) | Another concern for shipping is “spoofing.” | Another concern for shipping is “spoofing.” |
| 2411230a5f38-9415-4310-87af-517cc3f16467 | Not Translated (0%) | Spoofing is when a ship continues to transmit AIS data while hiding its identity or manipulating its location. | Spoofing is when a ship continues to transmit AIS data while hiding its identity or manipulating its location. |
| 2412230a5f38-9415-4310-87af-517cc3f16467 | Not Translated (0%) | This occurs through the manipulation of AIS data. | This occurs through the manipulation of AIS data. |
| 2413230a5f38-9415-4310-87af-517cc3f16467 | Not Translated (0%) | Spoofing can be done by forcing a stronger signal to override the AIS transmitted signal or through other hacking means. | Spoofing can be done by forcing a stronger signal to override the AIS transmitted signal or through other hacking means. |
| 2414ff01f8de-3d6e-47c4-a39c-eaec546e49b9 | Not Translated (0%) | In April 2019, a reporter was allowed to sail aboard the U.S.S. | In April 2019, a reporter was allowed to sail aboard the U.S.S. |
| 2415ff01f8de-3d6e-47c4-a39c-eaec546e49b9 | Not Translated (0%) | Milius, a destroyer that seeks out ships that have turned off their transponders. | Milius, a destroyer that seeks out ships that have turned off their transponders. |
| 2416ff01f8de-3d6e-47c4-a39c-eaec546e49b9 | Not Translated (0%) | The crew of the Milius discovered two ships that were suspected of secretly transferring oil to a tanker bound for North Korea. | The crew of the Milius discovered two ships that were suspected of secretly transferring oil to a tanker bound for North Korea. |
| 2417ff01f8de-3d6e-47c4-a39c-eaec546e49b9 | Not Translated (0%) | All three ships had turned off their transponders and communicated by radio. | All three ships had turned off their transponders and communicated by radio. |
| 241837450c70-30db-4a75-bf1e-0c28e6c82fee | Not Translated (0%) | The United Nations strictly limits petroleum to North Korea because of the country’s nuclear program, cyberattacks, human rights violations, and money laundering. | The United Nations strictly limits petroleum to North Korea because of the country’s nuclear program, cyberattacks, human rights violations, and money laundering. |
| 241937450c70-30db-4a75-bf1e-0c28e6c82fee | Not Translated (0%) | The United Nations reported that North Korea imported more than seven times its limit of petroleum in 2018. | The United Nations reported that North Korea imported more than seven times its limit of petroleum in 2018. |
| 2420ce7d0ebe-3825-444f-87b6-7dad42f0d483 | Not Translated (0%) | Although the Milius is equipped with cruise missiles and other weapons, when it finds a ship that has turned off its transponder, it does not attack. | Although the Milius is equipped with cruise missiles and other weapons, when it finds a ship that has turned off its transponder, it does not attack. |
| 2421ce7d0ebe-3825-444f-87b6-7dad42f0d483 | Not Translated (0%) | Instead, it passes its information to analysts, who try to identify the owner of the vessel. | Instead, it passes its information to analysts, who try to identify the owner of the vessel. |
| 2422ce7d0ebe-3825-444f-87b6-7dad42f0d483 | Not Translated (0%) | It also sends information about apparent sanctions violations to the United Nations. | It also sends information about apparent sanctions violations to the United Nations. |
| 2423ce7d0ebe-3825-444f-87b6-7dad42f0d483 | Not Translated (0%) | As a consequence, the United Nations may ban certain ships from international ports and blacklist the owners and operators of the ships. | As a consequence, the United Nations may ban certain ships from international ports and blacklist the owners and operators of the ships. |
| 2424fa30a134-db2f-4579-9194-51340e071227 | Not Translated (0%) | One of the ships the Milius found during the reporter’s visit was a tanker named the Oceanic Success. | One of the ships the Milius found during the reporter’s visit was a tanker named the Oceanic Success. |
| 2425fa30a134-db2f-4579-9194-51340e071227 | Not Translated (0%) | The ship’s transponder had been switched off for more than a month at the time it encountered the Milius. | The ship’s transponder had been switched off for more than a month at the time it encountered the Milius. |
| 2426fa30a134-db2f-4579-9194-51340e071227 | Not Translated (0%) | The Oceanic Success was registered in Mongolia, managed by a Taiwanese firm, and owned by a business in Hong Kong. | The Oceanic Success was registered in Mongolia, managed by a Taiwanese firm, and owned by a business in Hong Kong. |
| 2427fa30a134-db2f-4579-9194-51340e071227 | Not Translated (0%) | The reporter’s newspaper tried and failed to track down the ship’s owner. | The reporter’s newspaper tried and failed to track down the ship’s owner. |
| 2428ca8b1e3d-bfe3-42da-b117-30afce5d19c2 | Not Translated (0%) | In addition to the United States, seven other countries provide ships and planes to monitor sanctions violations. | In addition to the United States, seven other countries provide ships and planes to monitor sanctions violations. |
| 2429ca8b1e3d-bfe3-42da-b117-30afce5d19c2 | Not Translated (0%) | Japan, South Korea, France, the United Kingdom, Australia, New Zealand, and Canada help monitor areas where illegal transfers often happen. | Japan, South Korea, France, the United Kingdom, Australia, New Zealand, and Canada help monitor areas where illegal transfers often happen. |
| 2430e7c1287c-2084-4ac1-aa98-ed1c4033f6a1 | Not Translated (0%) | FALSIFICATION OF DOCUMENTS | FALSIFICATION OF DOCUMENTS |
| 243103d8195e-058d-4c44-b55d-69db65863937 | Not Translated (0%) | Sanctions evaders often falsify commercial invoices, bills of lading, and cargo manifests to conceal shipment contents or destinations that would arouse suspicion or trigger sanctions controls. | Sanctions evaders often falsify commercial invoices, bills of lading, and cargo manifests to conceal shipment contents or destinations that would arouse suspicion or trigger sanctions controls. |
| 243203d8195e-058d-4c44-b55d-69db65863937 | Not Translated (0%) | The physical merchandise is seen only when packaged and unpackaged, or if authorities make a random inspection. | The physical merchandise is seen only when packaged and unpackaged, or if authorities make a random inspection. |
| 243303d8195e-058d-4c44-b55d-69db65863937 | Not Translated (0%) | At all other times, the documentation (whether in hard copy or electronic) representing the shipment is taken at face value. | At all other times, the documentation (whether in hard copy or electronic) representing the shipment is taken at face value. |
| 243403d8195e-058d-4c44-b55d-69db65863937 | Not Translated (0%) | So when an evader falsifies details, shipments “fly below the radar,” with the contraband goods or sanctioned parties involved passing unnoticed. | So when an evader falsifies details, shipments “fly below the radar,” with the contraband goods or sanctioned parties involved passing unnoticed. |
| 24356d903777-321d-4b15-8472-623c15cee098 | Not Translated (0%) | Spot checks by customs authorities identify some fraud. | Spot checks by customs authorities identify some fraud. |
| 24366d903777-321d-4b15-8472-623c15cee098 | Not Translated (0%) | However, thousands of containers of goods pass through ocean ports around the world daily. | However, thousands of containers of goods pass through ocean ports around the world daily. |
| 24376d903777-321d-4b15-8472-623c15cee098 | Not Translated (0%) | Therefore, authorities rely on every party involved in a trade transaction to consider all other parties and all details involved in the transaction and to identify when something seems out of place. | Therefore, authorities rely on every party involved in a trade transaction to consider all other parties and all details involved in the transaction and to identify when something seems out of place. |
| 2438c66ea40f-187e-4e8b-aad9-1104529405bf | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 2439c66ea40f-187e-4e8b-aad9-1104529405bf | Not Translated (0%) | ACCESS USA SHIPPING LLC, 2017 | ACCESS USA SHIPPING LLC, 2017 |
| 2440c619a56d-68af-4d40-92ac-b505dfa58ee6 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 244128ffbde4-1e7c-481b-b147-16ec99632868 | Not Translated (0%) | In March 2017, the BIS fined Access USA Shipping LLC (doing business as MYUS), a Florida-based US shipping company, $27 million for violations of the Export Administration Regulations (EAR). | In March 2017, the BIS fined Access USA Shipping LLC (doing business as MYUS), a Florida-based US shipping company, $27 million for violations of the Export Administration Regulations (EAR). |
| 244228ffbde4-1e7c-481b-b147-16ec99632868 | Not Translated (0%) | These violations included evasion activity. | These violations included evasion activity. |
| 24430394d49f-d4d2-47ab-a298-50f376acc7b4 | Not Translated (0%) | Access USA was a package forwarding company. | Access USA was a package forwarding company. |
| 24440394d49f-d4d2-47ab-a298-50f376acc7b4 | Not Translated (0%) | It provided foreign customers with a US–based address and warehouse space in which to store goods bought from US merchants. | It provided foreign customers with a US–based address and warehouse space in which to store goods bought from US merchants. |
| 24450394d49f-d4d2-47ab-a298-50f376acc7b4 | Not Translated (0%) | Access would then manage the necessary shipping logistics to export the goods on behalf of its customers. | Access would then manage the necessary shipping logistics to export the goods on behalf of its customers. |
| 2446e30522f2-7992-4446-813f-9ab62633e610 | Not Translated (0%) | The company was charged with 150 violations of EAR, beginning in April 2011 and continuing through 2013. | The company was charged with 150 violations of EAR, beginning in April 2011 and continuing through 2013. |
| 2447e30522f2-7992-4446-813f-9ab62633e610 | Not Translated (0%) | Their actions included 129 instances of allowing their overseas customers to buy goods subject to EAR from US companies that did not know the goods were intended for export. | Their actions included 129 instances of allowing their overseas customers to buy goods subject to EAR from US companies that did not know the goods were intended for export. |
| 2448e30522f2-7992-4446-813f-9ab62633e610 | Not Translated (0%) | The company altered documents to include deliberate inaccuracies in the value and description of the goods. | The company altered documents to include deliberate inaccuracies in the value and description of the goods. |
| 2449e30522f2-7992-4446-813f-9ab62633e610 | Not Translated (0%) | Access USA also falsified export control documents. | Access USA also falsified export control documents. |
| 2450e30522f2-7992-4446-813f-9ab62633e610 | Not Translated (0%) | In addition, the company failed to maintain records required for exports. | In addition, the company failed to maintain records required for exports. |
| 2451f096591b-4735-4528-a975-c3d06e9ace71 | Not Translated (0%) | Access USA gave international customers a “suite” within Access’ US warehouse and a US address to receive goods. | Access USA gave international customers a “suite” within Access’ US warehouse and a US address to receive goods. |
| 2452f096591b-4735-4528-a975-c3d06e9ace71 | Not Translated (0%) | Once the goods arrived, Access employees would record receipt and the nature of goods accurately. | Once the goods arrived, Access employees would record receipt and the nature of goods accurately. |
| 2453f096591b-4735-4528-a975-c3d06e9ace71 | Not Translated (0%) | However, they revised the information before export, changing the description and reducing the value to avoid US export control scrutiny. | However, they revised the information before export, changing the description and reducing the value to avoid US export control scrutiny. |
| 2454f096591b-4735-4528-a975-c3d06e9ace71 | Not Translated (0%) | In some instances, Access employees removed packaging and labeling before export. | In some instances, Access employees removed packaging and labeling before export. |
| 2455697835ae-065c-47b7-8e29-116ec9ca6775 | Not Translated (0%) | Access also offered a “personal shopper” program. | Access also offered a “personal shopper” program. |
| 2456697835ae-065c-47b7-8e29-116ec9ca6775 | Not Translated (0%) | In this scheme, the company presented an Access employee to the US companies from which goods were purchased. | In this scheme, the company presented an Access employee to the US companies from which goods were purchased. |
| 2457697835ae-065c-47b7-8e29-116ec9ca6775 | Not Translated (0%) | Access falsely claimed that the employee was actually the buyer. | Access falsely claimed that the employee was actually the buyer. |
| 2458697835ae-065c-47b7-8e29-116ec9ca6775 | Not Translated (0%) | When sellers expressed concerns or reluctance to sell to foreign buyers, Access falsely presented an employee as the end user. | When sellers expressed concerns or reluctance to sell to foreign buyers, Access falsely presented an employee as the end user. |
| 2459697835ae-065c-47b7-8e29-116ec9ca6775 | Not Translated (0%) | In effect, Access set up a straw buyer for a fee. | In effect, Access set up a straw buyer for a fee. |
| 2460697835ae-065c-47b7-8e29-116ec9ca6775 | Not Translated (0%) | The company made these purchases in the name of Eric Baird, who was then CEO of Access. | The company made these purchases in the name of Eric Baird, who was then CEO of Access. |
| 24615733a992-68ac-4e01-a46f-08b6656bab90 | Not Translated (0%) | In December 2018, the US government indicted Baird. | In December 2018, the US government indicted Baird. |
| 24625733a992-68ac-4e01-a46f-08b6656bab90 | Not Translated (0%) | He pleaded guilty to one count of felony smuggling and 166 administrative violations of US export control laws. | He pleaded guilty to one count of felony smuggling and 166 administrative violations of US export control laws. |
| 24635733a992-68ac-4e01-a46f-08b6656bab90 | Not Translated (0%) | The plea was part of a global settlement with the US DOJ and BIS. | The plea was part of a global settlement with the US DOJ and BIS. |
| 24645733a992-68ac-4e01-a46f-08b6656bab90 | Not Translated (0%) | BIS issued an order outlining the administrative violations and imposing civil penalties of $17 million, with $7 million suspended, and a 5-year denial of export privileges. | BIS issued an order outlining the administrative violations and imposing civil penalties of $17 million, with $7 million suspended, and a 5-year denial of export privileges. |
| 24655733a992-68ac-4e01-a46f-08b6656bab90 | Not Translated (0%) | The civil penalty was the largest to be paid by an individual in BIS history. | The civil penalty was the largest to be paid by an individual in BIS history. |
| 2466b462ac48-f35d-4f2e-8cf2-8306592653d9 | Not Translated (0%) | Baird admitted to violations of the EAR committed from August 1, 2011, through January 7, 2013, during his tenure as CEO of Access USA Shipping, LLC. | Baird admitted to violations of the EAR committed from August 1, 2011, through January 7, 2013, during his tenure as CEO of Access USA Shipping, LLC. |
| 2467b462ac48-f35d-4f2e-8cf2-8306592653d9 | Not Translated (0%) | Under his direction, Access developed practices and policies that made it easier to conceal goods from US merchants. | Under his direction, Access developed practices and policies that made it easier to conceal goods from US merchants. |
| 2468b462ac48-f35d-4f2e-8cf2-8306592653d9 | Not Translated (0%) | While Baird ran the company, Access also falsified documents before exporting goods. | While Baird ran the company, Access also falsified documents before exporting goods. |
| 2469b462ac48-f35d-4f2e-8cf2-8306592653d9 | Not Translated (0%) | The activities that Baird knowingly authorized or participated in resulted in unlicensed exports of controlled items to various countries. | The activities that Baird knowingly authorized or participated in resulted in unlicensed exports of controlled items to various countries. |
| 2470b462ac48-f35d-4f2e-8cf2-8306592653d9 | Not Translated (0%) | The activities also resulted in repeated false statements on Automated Export System (AES) filings. | The activities also resulted in repeated false statements on Automated Export System (AES) filings. |
| 2471ffd97f47-e95d-460b-a51f-12fdd4814274 | Not Translated (0%) | As early as September 2011, Baird was made aware that undervaluing violated US export laws, including the EAR. | As early as September 2011, Baird was made aware that undervaluing violated US export laws, including the EAR. |
| 2472ffd97f47-e95d-460b-a51f-12fdd4814274 | Not Translated (0%) | Baird received emails on this subject from his chief technology officer, who stated, “I know we are WILLINGLY AND INTENTIONALLY breaking the law.” | Baird received emails on this subject from his chief technology officer, who stated, “I know we are WILLINGLY AND INTENTIONALLY breaking the law.” |
| 2473ffd97f47-e95d-460b-a51f-12fdd4814274 | Not Translated (0%) | In the same email chain, Baird suggested that Access USA could falsely reduce the value of items by 25% on export control documentation submitted to the US government and if “warned by [the US] government,” then the company “can stop ASAP.” | In the same email chain, Baird suggested that Access USA could falsely reduce the value of items by 25% on export control documentation submitted to the US government and if “warned by [the US] government,” then the company “can stop ASAP.” |
| 2474ffd97f47-e95d-460b-a51f-12fdd4814274 | Not Translated (0%) | This demonstrated a willingness to skirt the law until detected. | This demonstrated a willingness to skirt the law until detected. |
| 2475327ca00a-2379-4ab3-9663-2b26604095fa | Not Translated (0%) | Access used a variety of tactics to help its foreign customers buy and export goods from US merchants and evade trade restrictions. | Access used a variety of tactics to help its foreign customers buy and export goods from US merchants and evade trade restrictions. |
| 2476327ca00a-2379-4ab3-9663-2b26604095fa | Not Translated (0%) | For example, it changed the item descriptions on shipping documents. | For example, it changed the item descriptions on shipping documents. |
| 2477327ca00a-2379-4ab3-9663-2b26604095fa | Not Translated (0%) | It described rifle scopes as “sporting goods” and listed rifle stocks and grips as “toy accessories.” | It described rifle scopes as “sporting goods” and listed rifle stocks and grips as “toy accessories.” |
| 2478327ca00a-2379-4ab3-9663-2b26604095fa | Not Translated (0%) | Access also removed US merchant invoices that identified the goods involved. | Access also removed US merchant invoices that identified the goods involved. |
| 2479327ca00a-2379-4ab3-9663-2b26604095fa | Not Translated (0%) | It falsely used the names of its own employees as purchasers and end-users. | It falsely used the names of its own employees as purchasers and end-users. |
| 2480327ca00a-2379-4ab3-9663-2b26604095fa | Not Translated (0%) | And it amended records to make it seem as if shipments had been delivered to US recipients. | And it amended records to make it seem as if shipments had been delivered to US recipients. |
| 248113d54a30-2b7b-4b4f-a32d-28dd5fa309fc | Not Translated (0%) | “Former Florida CEO pleads guilty to export violations and agrees to pay record $17 million to Department of Commerce,” US Department of Commerce Bureau of Industry and Security, December 14, 2018. | “Former Florida CEO pleads guilty to export violations and agrees to pay record $17 million to Department of Commerce,” US Department of Commerce Bureau of Industry and Security, December 14, 2018. |
| 2482ef687369-a0bb-408d-900d-25be3fc6cb64 | Not Translated (0%) | , | , |
| 24830a1880a6-4fcc-4ab3-b7bb-85c0c1fbf78b | Not Translated (0%) | “Order relating to Access USA Shipping, LLC, doing business as MyUS.com,” US Department of Commerce Bureau of Industry and Security, February 9, 2017. | “Order relating to Access USA Shipping, LLC, doing business as MyUS.com,” US Department of Commerce Bureau of Industry and Security, February 9, 2017. |
| 24843fb582f3-eca2-4426-9cbe-18e1929fd98b | Not Translated (0%) | The root causes of the noncompliance included: | The root causes of the noncompliance included: |
| 248580d5da39-0277-43e9-98fa-b8f973f264ca | Not Translated (0%) | A flagrant disregard for the laws and regulations governing exports from the United States, as shown in the emails quoted above | A flagrant disregard for the laws and regulations governing exports from the United States, as shown in the emails quoted above |
| 2486d871654a-beaf-4455-a9dc-6be27bfdec83 | Not Translated (0%) | A seeming lack of understanding of the consequences for violating export regulations | A seeming lack of understanding of the consequences for violating export regulations |
| 2487100fcb8a-d604-4e69-ac76-c3539ad738e7 | Not Translated (0%) | Lack of any internal controls to ensure compliance with export regulations, including knowledge or training on the part of staff | Lack of any internal controls to ensure compliance with export regulations, including knowledge or training on the part of staff |
| 2488c9fd828f-3489-4ddf-a814-6e7e6dba8599 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 2489a63eb53f-54f7-4792-b709-0fb563efa42d | Not Translated (0%) | This case illustrates the importance of truly knowing a customer. | This case illustrates the importance of truly knowing a customer. |
| 2490a63eb53f-54f7-4792-b709-0fb563efa42d | Not Translated (0%) | Had the US companies done thorough due diligence when selling to Access or any of their foreign customers, they would have discovered the nature of the warehouse and likely uncovered the third-party nature of the shipping arrangement. | Had the US companies done thorough due diligence when selling to Access or any of their foreign customers, they would have discovered the nature of the warehouse and likely uncovered the third-party nature of the shipping arrangement. |
| 249189fdb210-5937-43d5-99e0-bcc05be29249 | Not Translated (0%) | In spite of detailed export regulations, documentation requirements, licensing, and so on, those determined to flout the regulations will find a structure that allows them to do so, even if only for a limited time. | In spite of detailed export regulations, documentation requirements, licensing, and so on, those determined to flout the regulations will find a structure that allows them to do so, even if only for a limited time. |
| 2492318157cc-e3ee-442a-b3f3-2a4266a4a8de | Not Translated (0%) | Any business engaged in trade must conduct thorough due diligence, particularly if the business trades in any controlled merchandise. | Any business engaged in trade must conduct thorough due diligence, particularly if the business trades in any controlled merchandise. |
| 24938a8950fe-077c-4308-b42c-d3abcab46129 | Not Translated (0%) | Concealing the Final Destination of Goods | Concealing the Final Destination of Goods |
| 2494aca836f1-47ba-4577-8b96-3edb5f4f9aac | Not Translated (0%) | Sanctions evaders can forge financial documentation, such as bills of lading, sales orders, and invoices to suggest that the final destination is different from the actual one. | Sanctions evaders can forge financial documentation, such as bills of lading, sales orders, and invoices to suggest that the final destination is different from the actual one. |
| 2495aca836f1-47ba-4577-8b96-3edb5f4f9aac | Not Translated (0%) | They can also falsify information about the actual transportation route. | They can also falsify information about the actual transportation route. |
| 2496aca836f1-47ba-4577-8b96-3edb5f4f9aac | Not Translated (0%) | When this happens, the goods go indirectly to a sanctioned territory. | When this happens, the goods go indirectly to a sanctioned territory. |
| 24974e50879c-064c-437b-aa23-7301eed666ad | Not Translated (0%) | Another way of concealing the final destination of goods happens when sanctions evaders use an agent or straw buyer in an unsanctioned jurisdiction. | Another way of concealing the final destination of goods happens when sanctions evaders use an agent or straw buyer in an unsanctioned jurisdiction. |
| 24984e50879c-064c-437b-aa23-7301eed666ad | Not Translated (0%) | This individual or entity may contract for the goods, or the ultimate buyer may contract in their name. | This individual or entity may contract for the goods, or the ultimate buyer may contract in their name. |
| 24994e50879c-064c-437b-aa23-7301eed666ad | Not Translated (0%) | In either case, the exporter is unaware of the final buyer or destination. | In either case, the exporter is unaware of the final buyer or destination. |
| 25004e50879c-064c-437b-aa23-7301eed666ad | Not Translated (0%) | Goods ship to the named destination, and then, after a brief stint in a warehouse during which the original exporter believes the transaction to be concluded, the goods ship on to their further destination. | Goods ship to the named destination, and then, after a brief stint in a warehouse during which the original exporter believes the transaction to be concluded, the goods ship on to their further destination. |
| 25014e50879c-064c-437b-aa23-7301eed666ad | Not Translated (0%) | Other methods of concealing goods’ final destination include using smaller vessels to ship the merchandise onward, transferring goods from ship to ship in international waters, and making an unscheduled stop in a sanctioned port. | Other methods of concealing goods’ final destination include using smaller vessels to ship the merchandise onward, transferring goods from ship to ship in international waters, and making an unscheduled stop in a sanctioned port. |
| 25021dc935ae-3da0-47e1-8b7a-148dc0ff3b51 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 25031dc935ae-3da0-47e1-8b7a-148dc0ff3b51 | Not Translated (0%) | TECHNOPROMEXPORT, 2017 | TECHNOPROMEXPORT, 2017 |
| 2504504f1d65-dce8-4a15-9a55-65c42d6e1bee | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 25054defcd52-f969-423f-8f86-5de354559e43 | Not Translated (0%) | Several governments have imposed sectoral sanctions on certain Russian entities. | Several governments have imposed sectoral sanctions on certain Russian entities. |
| 25064defcd52-f969-423f-8f86-5de354559e43 | Not Translated (0%) | These include specific prohibitions against the supply of equipment for certain infrastructure projects in Crimea and Sevastopol. | These include specific prohibitions against the supply of equipment for certain infrastructure projects in Crimea and Sevastopol. |
| 25074defcd52-f969-423f-8f86-5de354559e43 | Not Translated (0%) | The restrictions also include limits on the supply of equipment for certain infrastructure projects in the energy sector. | The restrictions also include limits on the supply of equipment for certain infrastructure projects in the energy sector. |
| 25086abbc6e5-3de9-4e2b-aa47-fc566d2914b3 | Not Translated (0%) | Early in 2014, both the European Union and the United States began imposing visa restrictions and asset freezes on Russian officials and companies because of the crisis in Ukraine. | Early in 2014, both the European Union and the United States began imposing visa restrictions and asset freezes on Russian officials and companies because of the crisis in Ukraine. |
| 25096abbc6e5-3de9-4e2b-aa47-fc566d2914b3 | Not Translated (0%) | Throughout the year as the Crimean crisis developed, the list of sanctioned individuals and entities grew, targeting Russia’s ability to import goods that would contribute to their military capacity as well as their energy sector, and then expanded to banks and arms companies. | Throughout the year as the Crimean crisis developed, the list of sanctioned individuals and entities grew, targeting Russia’s ability to import goods that would contribute to their military capacity as well as their energy sector, and then expanded to banks and arms companies. |
| 251094b4de5a-2c84-4e70-b217-417cbedd5338 | Not Translated (0%) | By December 2014, the European Union and the United States had prohibited all imports from and to Crimea. | By December 2014, the European Union and the United States had prohibited all imports from and to Crimea. |
| 251194b4de5a-2c84-4e70-b217-417cbedd5338 | Not Translated (0%) | The list of sanctioned officials and companies continued to grow, now targeting construction companies and other industries. | The list of sanctioned officials and companies continued to grow, now targeting construction companies and other industries. |
| 2512b2f81ff6-9204-4dda-a994-50aa7a9a2812 | Not Translated (0%) | In 2015 and 2016, a company in Europe (Siemens) entered into an agreement with a Russian state-owned company called Technopromexport. | In 2015 and 2016, a company in Europe (Siemens) entered into an agreement with a Russian state-owned company called Technopromexport. |
| 2513b2f81ff6-9204-4dda-a994-50aa7a9a2812 | Not Translated (0%) | The agreement was for the supply of seven gas turbines for use at an energy project in Taman, in the Krasnodar region of Russia. | The agreement was for the supply of seven gas turbines for use at an energy project in Taman, in the Krasnodar region of Russia. |
| 2514b2f81ff6-9204-4dda-a994-50aa7a9a2812 | Not Translated (0%) | Siemens delivered four turbines in accordance with the contract. | Siemens delivered four turbines in accordance with the contract. |
| 25158ebc3619-574a-474e-8a58-cc676f6d06d1 | Not Translated (0%) | As part of the transaction, Technopromexport warranted that the final destination for the turbines would not be Crimea, as this would violate the Crimea-specific sanctions. | As part of the transaction, Technopromexport warranted that the final destination for the turbines would not be Crimea, as this would violate the Crimea-specific sanctions. |
| 25168ebc3619-574a-474e-8a58-cc676f6d06d1 | Not Translated (0%) | However, Technopromexport’s true intention was to use the turbines in an energy project in Crimea, in violation of the EU sanctions. | However, Technopromexport’s true intention was to use the turbines in an energy project in Crimea, in violation of the EU sanctions. |
| 25178ebc3619-574a-474e-8a58-cc676f6d06d1 | Not Translated (0%) | The four turbines that had been delivered to Russia were shipped by Technopromexport to Crimea. | The four turbines that had been delivered to Russia were shipped by Technopromexport to Crimea. |
| 25188ebc3619-574a-474e-8a58-cc676f6d06d1 | Not Translated (0%) | Upon learning this, Siemens tried unsuccessfully to sue Technopromexport in Russia to obtain release from the sales contract and the option for the remaining three turbines. | Upon learning this, Siemens tried unsuccessfully to sue Technopromexport in Russia to obtain release from the sales contract and the option for the remaining three turbines. |
| 25198ebc3619-574a-474e-8a58-cc676f6d06d1 | Not Translated (0%) | Siemens cooperated fully with authorities. | Siemens cooperated fully with authorities. |
| 25208ebc3619-574a-474e-8a58-cc676f6d06d1 | Not Translated (0%) | As a result of this case, the EU added three individuals and three legal entities to its Russian sanctions list for violating the restrictions relating to Crimea. | As a result of this case, the EU added three individuals and three legal entities to its Russian sanctions list for violating the restrictions relating to Crimea. |
| 2521a6252320-a372-4b73-843f-198c19060ee7 | Not Translated (0%) | “U.S. sanctions on Russia: | “U.S. sanctions on Russia: |
| 2522a6252320-a372-4b73-843f-198c19060ee7 | Not Translated (0%) | An overview,” Congressional Research Service, January 2, 2019. | An overview,” Congressional Research Service, January 2, 2019. |
| 25232c24bf54-674b-489b-8ca2-70b542f12093 | Not Translated (0%) | , | , |
| 2524cd7511c5-71a9-4d1f-9285-65af17f4c6e1 | Not Translated (0%) | “Treasury sanctions additional individuals and entities in connection with the conflict in Ukraine and Russia’s occupation of Crimea,” US Department of the Treasury, January 26, 2018. | “Treasury sanctions additional individuals and entities in connection with the conflict in Ukraine and Russia’s occupation of Crimea,” US Department of the Treasury, January 26, 2018. |
| 2525d0baa895-bb0a-42b3-827b-3800f0a58f39 | Not Translated (0%) | , | , |
| 252683ba0298-0915-4a71-bb4b-46729d37f15f | Not Translated (0%) | Three Siemens employees investigated over turbines in Crimea,” Reuters, November 29, 2018. | Three Siemens employees investigated over turbines in Crimea,” Reuters, November 29, 2018. |
| 252752e8957e-764c-4a7a-8fc2-56c9e3c0333e | Not Translated (0%) | Technopromexport Example | Technopromexport Example |
| 2528df977426-3981-4a01-b378-c33b1f1b04ea | Not Translated (0%) | The following is a list of root causes of the noncompliance: | The following is a list of root causes of the noncompliance: |
| 25292c8f05a5-f244-4877-95e1-50f5bc8c3ffc | Not Translated (0%) | Technopromexport’s intent was likely always to use the contracted goods in Crimea, although at the time the contract was initially drawn up, the restrictions did not yet affect this industry sector. | Technopromexport’s intent was likely always to use the contracted goods in Crimea, although at the time the contract was initially drawn up, the restrictions did not yet affect this industry sector. |
| 25302c8f05a5-f244-4877-95e1-50f5bc8c3ffc | Not Translated (0%) | Since all sanctions were related to Russia’s actions in Ukraine and the company was state owned, Technopromexport was able to foresee the continued difficulties. | Since all sanctions were related to Russia’s actions in Ukraine and the company was state owned, Technopromexport was able to foresee the continued difficulties. |
| 25315188bff2-783a-48d3-b831-51cd166295b9 | Not Translated (0%) | Since Technopromexport is state-owned, its actions are likely to fall in line with those of the Russian government. | Since Technopromexport is state-owned, its actions are likely to fall in line with those of the Russian government. |
| 25325188bff2-783a-48d3-b831-51cd166295b9 | Not Translated (0%) | Therefore, Siemens should have known the violation of contract terms was possible—unless Siemens did not perform sufficient due diligence on its buyer. | Therefore, Siemens should have known the violation of contract terms was possible—unless Siemens did not perform sufficient due diligence on its buyer. |
| 2533f9d29cd9-58ae-402b-a5ba-32937e921de1 | Not Translated (0%) | Siemens had no ability to force compliance with the contract once the goods had been delivered. | Siemens had no ability to force compliance with the contract once the goods had been delivered. |
| 25340c9be52a-0978-487a-bed3-fd9275c53eb0 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 253514c370e0-658c-439e-af73-87befc28a2b2 | Not Translated (0%) | The presence of state ownership can affect an individual’s or a company’s actions. | The presence of state ownership can affect an individual’s or a company’s actions. |
| 2536d6735a9c-617f-4dbd-a128-c6bb892d78fc | Not Translated (0%) | A contract or transaction, although not originally in violation of any sanctions, may now violate relevant laws or regulations. | A contract or transaction, although not originally in violation of any sanctions, may now violate relevant laws or regulations. |
| 2537f9c3da3d-ea43-4108-be36-9f1205e89b74 | Not Translated (0%) | It is crucial to be aware of the environment in which an organization is conducting business and to stay abreast of all changes. | It is crucial to be aware of the environment in which an organization is conducting business and to stay abreast of all changes. |
| 2538f9c3da3d-ea43-4108-be36-9f1205e89b74 | Not Translated (0%) | Otherwise, sanctions may be unintentionally violated. | Otherwise, sanctions may be unintentionally violated. |
| 2539204205df-d8af-41e1-b39a-1ae451d5e640 | Not Translated (0%) | Back-to-Back Letters of Credit | Back-to-Back Letters of Credit |
| 25401ec7852d-1ab9-48d1-99ca-a9fe2e0bc9ab | Not Translated (0%) | Another evasion technique you may encounter is back-to-back letters of credit. | Another evasion technique you may encounter is back-to-back letters of credit. |
| 25411ec7852d-1ab9-48d1-99ca-a9fe2e0bc9ab | Not Translated (0%) | In this situation, Bank A issues a letter of credit as collateral to Bank B in order to issue a separate letter of credit to the beneficiary. | In this situation, Bank A issues a letter of credit as collateral to Bank B in order to issue a separate letter of credit to the beneficiary. |
| 25421ec7852d-1ab9-48d1-99ca-a9fe2e0bc9ab | Not Translated (0%) | This often happens when the underlying agreement between the applicant and beneficiary contains restrictions about the credit quality of the bank that is issuing the letter of credit, the location of the issuing bank, or other stipulations that prevent the applicant’s bank from issuing a direct letter of credit to the beneficiary. | This often happens when the underlying agreement between the applicant and beneficiary contains restrictions about the credit quality of the bank that is issuing the letter of credit, the location of the issuing bank, or other stipulations that prevent the applicant’s bank from issuing a direct letter of credit to the beneficiary. |
| 254328d142f5-fdf4-4f91-b598-5bbd2fc5afe3 | Not Translated (0%) | A sanctions evader can use a back-to-back letter of credit to remove the name of a sanctioned bank from the documentation more effectively than would be possible with a transferred letter of credit. | A sanctions evader can use a back-to-back letter of credit to remove the name of a sanctioned bank from the documentation more effectively than would be possible with a transferred letter of credit. |
| 254428d142f5-fdf4-4f91-b598-5bbd2fc5afe3 | Not Translated (0%) | (A transferred letter of credit is one that Bank A issues in favor of Bank B. Bank B then “transfers” the letter of credit through an advising bank, Bank C, to the ultimate beneficiary.) | (A transferred letter of credit is one that Bank A issues in favor of Bank B. Bank B then “transfers” the letter of credit through an advising bank, Bank C, to the ultimate beneficiary.) |
| 254528d142f5-fdf4-4f91-b598-5bbd2fc5afe3 | Not Translated (0%) | With a back-to-back letter of credit, the beneficiary receives a letter of credit from an unsanctioned bank without mention of the original issuing bank. | With a back-to-back letter of credit, the beneficiary receives a letter of credit from an unsanctioned bank without mention of the original issuing bank. |
| 254628d142f5-fdf4-4f91-b598-5bbd2fc5afe3 | Not Translated (0%) | The beneficiary may not even know that a sanctioned institution is involved in the transaction. | The beneficiary may not even know that a sanctioned institution is involved in the transaction. |
| 2547003680a1-1928-4751-9563-a9725ba7615b | Not Translated (0%) | An organization can avoid taking part in this type of sanctions violation by watching out for these red flags: instructions to amend the terms, alter the destination of goods, change the name of a vessel, remove a bank or applicant name, or change a bank or applicant name. | An organization can avoid taking part in this type of sanctions violation by watching out for these red flags: instructions to amend the terms, alter the destination of goods, change the name of a vessel, remove a bank or applicant name, or change a bank or applicant name. |
| 2548003680a1-1928-4751-9563-a9725ba7615b | Not Translated (0%) | Any of these directions requires further investigation. | Any of these directions requires further investigation. |
| 254925371c1d-b6c6-4705-b4db-1a2c2a37fc84 | Not Translated (0%) | The bank named as beneficiary on the initial letter of credit would need to be complicit in this arrangement, or at least negligent, in order to remove all mention of the sanctioned institution from the outgoing letter of credit. | The bank named as beneficiary on the initial letter of credit would need to be complicit in this arrangement, or at least negligent, in order to remove all mention of the sanctioned institution from the outgoing letter of credit. |
| 255025371c1d-b6c6-4705-b4db-1a2c2a37fc84 | Not Translated (0%) | It’s crucial for banks that operate in multiple jurisdictions to understand the sanctions that apply to the local jurisdiction as well as those that apply to other jurisdictions where customers transact, and where the institution may also have responsibilities. | It’s crucial for banks that operate in multiple jurisdictions to understand the sanctions that apply to the local jurisdiction as well as those that apply to other jurisdictions where customers transact, and where the institution may also have responsibilities. |
| 2551b9dea519-4686-4215-9a95-16dd4047e8dd | Not Translated (0%) | Exporting without a License | Exporting without a License |
| 25523438fb61-d361-4bd8-944a-e8f4eb148002 | Not Translated (0%) | Export licenses are required based on the destination for the shipment, the type of goods being exported, or both these factors. | Export licenses are required based on the destination for the shipment, the type of goods being exported, or both these factors. |
| 25533438fb61-d361-4bd8-944a-e8f4eb148002 | Not Translated (0%) | To avoid the requirement for the license, an importer or exporter may disguise the true destination for the goods. | To avoid the requirement for the license, an importer or exporter may disguise the true destination for the goods. |
| 25543438fb61-d361-4bd8-944a-e8f4eb148002 | Not Translated (0%) | The importer or exporter will list the final destination as a neutral country for which a license isn’t required. | The importer or exporter will list the final destination as a neutral country for which a license isn’t required. |
| 25553438fb61-d361-4bd8-944a-e8f4eb148002 | Not Translated (0%) | Then the importer or exporter will ship the goods to the restricted or sanctioned destination at a later date. | Then the importer or exporter will ship the goods to the restricted or sanctioned destination at a later date. |
| 25563438fb61-d361-4bd8-944a-e8f4eb148002 | Not Translated (0%) | The shipping could take place either directly or through an agent. | The shipping could take place either directly or through an agent. |
| 25575bfe7c32-0068-4426-bc57-83862ff4499a | Not Translated (0%) | What if the goods themselves require the license? | What if the goods themselves require the license? |
| 25585bfe7c32-0068-4426-bc57-83862ff4499a | Not Translated (0%) | To avoid the required license, the importer or exporter may misstate the purpose or use of the goods, in the case of dual-use merchandise. | To avoid the required license, the importer or exporter may misstate the purpose or use of the goods, in the case of dual-use merchandise. |
| 25595bfe7c32-0068-4426-bc57-83862ff4499a | Not Translated (0%) | Examples of dual-use merchandise include lasers, sensors, navigation equipment, chemicals, microorganisms, and toxins. | Examples of dual-use merchandise include lasers, sensors, navigation equipment, chemicals, microorganisms, and toxins. |
| 25609e0dc3ca-aca5-4952-9e73-7e535c7a41fd | Not Translated (0%) | What if the purpose of the goods cannot be disguised? | What if the purpose of the goods cannot be disguised? |
| 25619e0dc3ca-aca5-4952-9e73-7e535c7a41fd | Not Translated (0%) | In that case, the importer or exporter may falsify information outright on the documentation for the shipment. | In that case, the importer or exporter may falsify information outright on the documentation for the shipment. |
| 25629e0dc3ca-aca5-4952-9e73-7e535c7a41fd | Not Translated (0%) | For example, they might list precision machine parts as scrap metal. | For example, they might list precision machine parts as scrap metal. |
| 2563ddfe57ba-85ef-40fc-baad-1d332dd7f070 | Not Translated (0%) | In 2016, the United States imprisoned and fined several individuals for violating US trade restrictions relating to microelectronics. | In 2016, the United States imprisoned and fined several individuals for violating US trade restrictions relating to microelectronics. |
| 2564ddfe57ba-85ef-40fc-baad-1d332dd7f070 | Not Translated (0%) | The group developed a scheme to export these goods illegally from the United States without getting the required licenses. | The group developed a scheme to export these goods illegally from the United States without getting the required licenses. |
| 2565ddfe57ba-85ef-40fc-baad-1d332dd7f070 | Not Translated (0%) | As part of this scheme, the group used US–based front companies to buy the goods and then arranged for their shipment to Russian end users. | As part of this scheme, the group used US–based front companies to buy the goods and then arranged for their shipment to Russian end users. |
| 2566f50ec390-ec1e-4195-a340-229bc8888ae2 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 2567f50ec390-ec1e-4195-a340-229bc8888ae2 | Not Translated (0%) | EMENIKE NWANKWOALA, 2011 | EMENIKE NWANKWOALA, 2011 |
| 25689f12fe26-ed17-4818-a8ea-9b995d77ee64 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 25696e0fddaa-66b6-436c-99cf-fff9f2175b41 | Not Translated (0%) | In January 2011, a Maryland judge sentenced Emenike Nwankwoala, a former state probation officer, to 37 months in prison in accordance with a plea agreement. | In January 2011, a Maryland judge sentenced Emenike Nwankwoala, a former state probation officer, to 37 months in prison in accordance with a plea agreement. |
| 25706e0fddaa-66b6-436c-99cf-fff9f2175b41 | Not Translated (0%) | His crimes included exporting arms without a license, exporting controlled goods without a license, and delivering a gun to a carrier without proper notification. | His crimes included exporting arms without a license, exporting controlled goods without a license, and delivering a gun to a carrier without proper notification. |
| 25716e0fddaa-66b6-436c-99cf-fff9f2175b41 | Not Translated (0%) | The investigation into his conduct involved Homeland Security, ICE, US Customs and Border Protection, and the commerce department’s Export Enforcement office. | The investigation into his conduct involved Homeland Security, ICE, US Customs and Border Protection, and the commerce department’s Export Enforcement office. |
| 25729b1f9d47-cb3d-4533-94ae-800c9bd2e8fd | Not Translated (0%) | According to the US attorney for the case, Nwankwoala exported arms to Nigeria for a decade. | According to the US attorney for the case, Nwankwoala exported arms to Nigeria for a decade. |
| 25739b1f9d47-cb3d-4533-94ae-800c9bd2e8fd | Not Translated (0%) | He had no export license and no license to operate as an arms dealer. | He had no export license and no license to operate as an arms dealer. |
| 25749b1f9d47-cb3d-4533-94ae-800c9bd2e8fd | Not Translated (0%) | Nwankwoala smuggled the arms by falsifying the contents of shipping containers and providing false information about their destination. | Nwankwoala smuggled the arms by falsifying the contents of shipping containers and providing false information about their destination. |
| 25753b41f317-174c-4e04-9929-11d7f2c4533d | Not Translated (0%) | After being granted a license to send one shotgun to Nigeria for personal use, Nwankwoala applied for a broader license to send a number of guns to a shooting range. | After being granted a license to send one shotgun to Nigeria for personal use, Nwankwoala applied for a broader license to send a number of guns to a shooting range. |
| 25763b41f317-174c-4e04-9929-11d7f2c4533d | Not Translated (0%) | This second license was denied because he couldn’t identify the end user of the weapons. | This second license was denied because he couldn’t identify the end user of the weapons. |
| 25773b41f317-174c-4e04-9929-11d7f2c4533d | Not Translated (0%) | He shipped the arms without the required license by concealing them in shipping containers with cars, hospital beds, and other unregulated contents. | He shipped the arms without the required license by concealing them in shipping containers with cars, hospital beds, and other unregulated contents. |
| 25783b41f317-174c-4e04-9929-11d7f2c4533d | Not Translated (0%) | He reported this scheme to an undercover ICE agent during that agency’s investigation. | He reported this scheme to an undercover ICE agent during that agency’s investigation. |
| 257942bb1b1f-e69d-4b8f-906e-4cdf5e8422da | Not Translated (0%) | Nwankwoala at first tried to get the required licenses. | Nwankwoala at first tried to get the required licenses. |
| 258042bb1b1f-e69d-4b8f-906e-4cdf5e8422da | Not Translated (0%) | When this proved difficult, he simply lied to get around the regulations. | When this proved difficult, he simply lied to get around the regulations. |
| 258142bb1b1f-e69d-4b8f-906e-4cdf5e8422da | Not Translated (0%) | To purchase weapons in bulk, Nwankwoala falsely informed some sellers that he had an export license and was supplying guns to a shooting range in Nigeria. | To purchase weapons in bulk, Nwankwoala falsely informed some sellers that he had an export license and was supplying guns to a shooting range in Nigeria. |
| 258242bb1b1f-e69d-4b8f-906e-4cdf5e8422da | Not Translated (0%) | He concealed multiple shipments between 2006 and 2009 in containers labeled as “household goods” or “used equipment.” | He concealed multiple shipments between 2006 and 2009 in containers labeled as “household goods” or “used equipment.” |
| 258342bb1b1f-e69d-4b8f-906e-4cdf5e8422da | Not Translated (0%) | One such shipment was detected and confiscated in Spain, where the weapons were traced to Nwankwoala as the purchaser. | One such shipment was detected and confiscated in Spain, where the weapons were traced to Nwankwoala as the purchaser. |
| 2584e0048884-0ce5-4218-abc6-63eae4b2225b | Not Translated (0%) | This case shows how one person with the intent to deceive can evade export controls multiple times simply by falsifying documents. | This case shows how one person with the intent to deceive can evade export controls multiple times simply by falsifying documents. |
| 2585e0048884-0ce5-4218-abc6-63eae4b2225b | Not Translated (0%) | It can take years and significant resources to identify the bad actor. | It can take years and significant resources to identify the bad actor. |
| 2586e0048884-0ce5-4218-abc6-63eae4b2225b | Not Translated (0%) | The international shipment industry relies on accurate and truthful completion of documents, and the resources or method to verify each and every shipment simply are not available or practical. | The international shipment industry relies on accurate and truthful completion of documents, and the resources or method to verify each and every shipment simply are not available or practical. |
| 2587e0048884-0ce5-4218-abc6-63eae4b2225b | Not Translated (0%) | Nwankwoala’s case shows how vulnerable the system can be. | Nwankwoala’s case shows how vulnerable the system can be. |
| 2588222d1a97-bc18-4b2f-b81b-38cb5abd49ac | Not Translated (0%) | “Former Maryland Probation Officer Sentenced to Over Three Years In Prison For Illegally Exporting Guns And Ammunition To Nigeria,” US Department of Justice, January 3, 2011. | “Former Maryland Probation Officer Sentenced to Over Three Years In Prison For Illegally Exporting Guns And Ammunition To Nigeria,” US Department of Justice, January 3, 2011. |
| 2589183a889e-a1ef-4df2-8b02-0e8e4a75a389 | Not Translated (0%) | Rick Shimon, the special agent in charge of the Washington field office of the Office of Export Enforcement, stated, “This is an especially egregious crime given that a criminal justice official entrusted with upholding the law smuggled weapons out of the country.” | Rick Shimon, the special agent in charge of the Washington field office of the Office of Export Enforcement, stated, “This is an especially egregious crime given that a criminal justice official entrusted with upholding the law smuggled weapons out of the country.” |
| 259009257fee-3da3-4e85-9148-0087e92b8bf0 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 25916f061b8b-416e-4703-a69d-85e6a4e6930a | Not Translated (0%) | What red flags from Nwankwoala’s case can apply to other possible cases of sanctions evasion? | What red flags from Nwankwoala’s case can apply to other possible cases of sanctions evasion? |
| 25926f061b8b-416e-4703-a69d-85e6a4e6930a | Not Translated (0%) | Employees of financial institutions should exercise caution in any of these situations: | Employees of financial institutions should exercise caution in any of these situations: |
| 25930d962a85-2c6d-403b-9f81-39e40516f363 | Not Translated (0%) | The client or potential client cannot identify the shipment’s end user. | The client or potential client cannot identify the shipment’s end user. |
| 2594e1f152d7-7653-4189-9fe4-c89674443ce8 | Not Translated (0%) | The client or potential client classifies goods in general terms, such as “used equipment” or “household items.” | The client or potential client classifies goods in general terms, such as “used equipment” or “household items.” |
| 25956660e240-499c-47a5-9244-9aff1a15d3c2 | Not Translated (0%) | The client or potential client falsifies documents. | The client or potential client falsifies documents. |
| 25964866a395-d243-4c25-8dbf-1a9492937168 | Not Translated (0%) | The client or potential client makes claims with little or no credible documentation. | The client or potential client makes claims with little or no credible documentation. |
| 259706c41540-96c2-454f-9e3b-aceb0ff3d407 | Not Translated (0%) | Nwankwola’s false claim was that he had an export license. | Nwankwola’s false claim was that he had an export license. |
| 25987e133068-3bcd-4e55-a5ef-c2585ae0eb5f | Not Translated (0%) | USE OF FRONT AND SHELL COMPANIES | USE OF FRONT AND SHELL COMPANIES |
| 25990a1bd75b-00fd-4c35-bb93-ca7e322dad52 | Not Translated (0%) | Evaders often use front companies and shell companies to conceal the identity of end users or the final destination where the goods are really being shipped. | Evaders often use front companies and shell companies to conceal the identity of end users or the final destination where the goods are really being shipped. |
| 26000a1bd75b-00fd-4c35-bb93-ca7e322dad52 | Not Translated (0%) | What is the difference between these terms? | What is the difference between these terms? |
| 26010a1bd75b-00fd-4c35-bb93-ca7e322dad52 | Not Translated (0%) | A front company is an entity that is meant to shield another company from liability or scrutiny. | A front company is an entity that is meant to shield another company from liability or scrutiny. |
| 26020a1bd75b-00fd-4c35-bb93-ca7e322dad52 | Not Translated (0%) | A shell company is a company without active business or significant assets. | A shell company is a company without active business or significant assets. |
| 26030a1bd75b-00fd-4c35-bb93-ca7e322dad52 | Not Translated (0%) | Shell companies are legal, but people sometimes use them illegitimately—for instance, to disguise business ownership. | Shell companies are legal, but people sometimes use them illegitimately—for instance, to disguise business ownership. |
| 2604696682c7-825f-46fe-9687-4235bd6c1104 | Not Translated (0%) | Evaders can use these entities to hide the identity of end-users or the final destination of goods. | Evaders can use these entities to hide the identity of end-users or the final destination of goods. |
| 2605696682c7-825f-46fe-9687-4235bd6c1104 | Not Translated (0%) | For example, evaders can incorporate a front or shell company in a third country and arrange for citizens of that third country to manage it. | For example, evaders can incorporate a front or shell company in a third country and arrange for citizens of that third country to manage it. |
| 2606696682c7-825f-46fe-9687-4235bd6c1104 | Not Translated (0%) | This can make it seem as though the company buying the goods—in other words, the end-user—is operating in a third country. | This can make it seem as though the company buying the goods—in other words, the end-user—is operating in a third country. |
| 2607696682c7-825f-46fe-9687-4235bd6c1104 | Not Translated (0%) | When an entity is managed by an administration business based in another jurisdiction, front or shell companies give that entity a registered address and perhaps a bank account in that jurisdiction. | When an entity is managed by an administration business based in another jurisdiction, front or shell companies give that entity a registered address and perhaps a bank account in that jurisdiction. |
| 26084e3ee626-b15c-4c0e-87ab-6ff70822eda6 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 26094e3ee626-b15c-4c0e-87ab-6ff70822eda6 | Not Translated (0%) | TRANS MERITS CO., 2014 | TRANS MERITS CO., 2014 |
| 261023f48779-5dbb-4556-adb8-460f51684785 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 2611199d29ad-9303-438d-96c1-daf240ba4109 | Not Translated (0%) | In October 2014, Alex H. T. Tsai and his son Yueh-Hsun (Gary) Tsai were arrested and charged with conspiring to defraud the United States in its enforcement of laws and regulations prohibiting the proliferation of weapons of mass destruction. | In October 2014, Alex H. T. Tsai and his son Yueh-Hsun (Gary) Tsai were arrested and charged with conspiring to defraud the United States in its enforcement of laws and regulations prohibiting the proliferation of weapons of mass destruction. |
| 2612199d29ad-9303-438d-96c1-daf240ba4109 | Not Translated (0%) | Alex Tsai was connected with three companies based in Taiwan: | Alex Tsai was connected with three companies based in Taiwan: |
| 2613199d29ad-9303-438d-96c1-daf240ba4109 | Not Translated (0%) | Global Interface Company, Inc.; Trans Merits Co., Ltd.; and Trans Multi Mechanics Co., Ltd. These companies procured precision metalworking machinery and dual-use equipment from the United States and other countries for export to North Korea’s primary arms dealer, the Korea Mining Development Trading Corporation (KOMID). | Global Interface Company, Inc.; Trans Merits Co., Ltd.; and Trans Multi Mechanics Co., Ltd. These companies procured precision metalworking machinery and dual-use equipment from the United States and other countries for export to North Korea’s primary arms dealer, the Korea Mining Development Trading Corporation (KOMID). |
| 2614199d29ad-9303-438d-96c1-daf240ba4109 | Not Translated (0%) | The United Nations and the US Department of the Treasury designated KOMID as a sanctioned entity in 2009. | The United Nations and the US Department of the Treasury designated KOMID as a sanctioned entity in 2009. |
| 261570b5e507-7ebc-48c0-9f7d-e669fe5d5b0c | Not Translated (0%) | Alex Tsai and his company Trans Merits Co. were designated in 2009 for involvement with the proliferation of weapons of mass destruction. | Alex Tsai and his company Trans Merits Co. were designated in 2009 for involvement with the proliferation of weapons of mass destruction. |
| 261670b5e507-7ebc-48c0-9f7d-e669fe5d5b0c | Not Translated (0%) | From this point on, it was illegal for any US person to do business with either Alex Tsai or Trans Merits. | From this point on, it was illegal for any US person to do business with either Alex Tsai or Trans Merits. |
| 261770b5e507-7ebc-48c0-9f7d-e669fe5d5b0c | Not Translated (0%) | Despite this, Gary Tsai established a US–based “front company” to conceal the involvement of his father and continue the business. | Despite this, Gary Tsai established a US–based “front company” to conceal the involvement of his father and continue the business. |
| 2618527a5208-ec11-4b5d-9f1e-9921f81fe2f0 | Not Translated (0%) | Next, the companies and individuals began a concerted effort to continue the export of equipment to North Korea. | Next, the companies and individuals began a concerted effort to continue the export of equipment to North Korea. |
| 2619527a5208-ec11-4b5d-9f1e-9921f81fe2f0 | Not Translated (0%) | They removed Alex Tsai’s name, and that of Trans Merits, to evade detection by sanctions screening filters. | They removed Alex Tsai’s name, and that of Trans Merits, to evade detection by sanctions screening filters. |
| 2620527a5208-ec11-4b5d-9f1e-9921f81fe2f0 | Not Translated (0%) | Alex Tsai transmitted funds into the United States through a third party to conceal his involvement. | Alex Tsai transmitted funds into the United States through a third party to conceal his involvement. |
| 2621527a5208-ec11-4b5d-9f1e-9921f81fe2f0 | Not Translated (0%) | Gary Tsai helped his father conduct business under other company names by falsifying invoices and shipment documents to conceal the involvement of the listed companies. | Gary Tsai helped his father conduct business under other company names by falsifying invoices and shipment documents to conceal the involvement of the listed companies. |
| 2622527a5208-ec11-4b5d-9f1e-9921f81fe2f0 | Not Translated (0%) | Both pleaded guilty. | Both pleaded guilty. |
| 2623fc6e08f2-5462-4291-bce5-5356a2a7b9d3 | Not Translated (0%) | “Taiwanese Businessman Pleads Guilty To Conspiring To Violate U.S. Laws Preventing Proliferation Of Weapons Of Mass Destruction,” US Department of Justice, October 10, 2014. | “Taiwanese Businessman Pleads Guilty To Conspiring To Violate U.S. Laws Preventing Proliferation Of Weapons Of Mass Destruction,” US Department of Justice, October 10, 2014. |
| 26248f64d318-d59f-48f0-86a0-8f3cdacea8ba | Not Translated (0%) | KEY TAKEAWAYS: | KEY TAKEAWAYS: |
| 2625aa78dcc6-6205-42b5-bde4-ac8b0ce986d8 | Not Translated (0%) | The type of fraud that Alex and Gary Tsai perpetrated can be difficult to detect. | The type of fraud that Alex and Gary Tsai perpetrated can be difficult to detect. |
| 2626aa78dcc6-6205-42b5-bde4-ac8b0ce986d8 | Not Translated (0%) | The best way to arm oneself is to have full information for customers. | The best way to arm oneself is to have full information for customers. |
| 2627aa78dcc6-6205-42b5-bde4-ac8b0ce986d8 | Not Translated (0%) | In this case, the close relative of an OFAC SDN was able to continue the illicit activities. | In this case, the close relative of an OFAC SDN was able to continue the illicit activities. |
| 2628aa78dcc6-6205-42b5-bde4-ac8b0ce986d8 | Not Translated (0%) | Additional due diligence into Gary Tsai’s business activities might have brought his actions to light sooner. | Additional due diligence into Gary Tsai’s business activities might have brought his actions to light sooner. |
| 262952cb0d85-0458-4f1a-a1b2-3407218f7316 | Not Translated (0%) | It is important to know who customers are, and identify any connections to other companies or any cross-connections between other individuals and other organizations. | It is important to know who customers are, and identify any connections to other companies or any cross-connections between other individuals and other organizations. |
| 263052cb0d85-0458-4f1a-a1b2-3407218f7316 | Not Translated (0%) | In this way, shell companies, front companies, and patterns can be detected as early as possible. | In this way, shell companies, front companies, and patterns can be detected as early as possible. |
| 263152cb0d85-0458-4f1a-a1b2-3407218f7316 | Not Translated (0%) | Third-party due diligence systems can be key to this type of connected information. | Third-party due diligence systems can be key to this type of connected information. |
| 2632cef81247-94e7-419b-9006-7ba7513a8150 | Not Translated (0%) | What red flags from this case can apply to other possible cases of sanctions evasion? | What red flags from this case can apply to other possible cases of sanctions evasion? |
| 2633f7e6f576-3a7b-4a1b-ac2d-dd047a29d623 | Not Translated (0%) | Employees of financial institutions should exercise caution in any of these situations: | Employees of financial institutions should exercise caution in any of these situations: |
| 2634a46b83bc-2c8d-4e4b-a99e-86cfb7285bbe | Not Translated (0%) | The client or potential client falsifies documents. | The client or potential client falsifies documents. |
| 2635ff59aa87-2c90-4555-abb3-f58c204b21e7 | Not Translated (0%) | The client or potential client procures dual-use equipment. | The client or potential client procures dual-use equipment. |
| 2636383c560f-70da-4d55-a8fc-8b1976c80844 | Not Translated (0%) | The client or potential client is designated for involvement with the proliferation of weapons of mass destruction. | The client or potential client is designated for involvement with the proliferation of weapons of mass destruction. |
| 2637d76dd6c0-571a-428a-ae8c-1c7a7ce2a3c1 | Not Translated (0%) | The client or potential client establishes a front or shell company. | The client or potential client establishes a front or shell company. |
| 26382eb0754e-f340-4d1b-9e86-215a7dfdbbe0 | Not Translated (0%) | In Search of a Clean Business Record | In Search of a Clean Business Record |
| 2639d1974380-1361-41dd-8b1a-29f131361c13 | Not Translated (0%) | People also use shell and front companies to evade sanctions because these companies have “clean” business records. | People also use shell and front companies to evade sanctions because these companies have “clean” business records. |
| 2640d1974380-1361-41dd-8b1a-29f131361c13 | Not Translated (0%) | Actually, they have no business records. | Actually, they have no business records. |
| 2641d1974380-1361-41dd-8b1a-29f131361c13 | Not Translated (0%) | Because they have never actually done business, there is no adverse information that might call into question the role of these companies in a trade transaction. | Because they have never actually done business, there is no adverse information that might call into question the role of these companies in a trade transaction. |
| 2642d1974380-1361-41dd-8b1a-29f131361c13 | Not Translated (0%) | Some evaders use a front company that has a business record. | Some evaders use a front company that has a business record. |
| 2643d1974380-1361-41dd-8b1a-29f131361c13 | Not Translated (0%) | However, the historical business activities appear relatively low risk from a sanctions perspective. | However, the historical business activities appear relatively low risk from a sanctions perspective. |
| 2644f244ebcf-b2ae-47eb-84fb-1b0a89903d5a | Not Translated (0%) | Some investors use “shelf” or “aged” companies to gain a clean business record. | Some investors use “shelf” or “aged” companies to gain a clean business record. |
| 2645f244ebcf-b2ae-47eb-84fb-1b0a89903d5a | Not Translated (0%) | Unlike a shell company, a shelf company has been created months or years ahead of time, often by a law firm or an accounting firm. | Unlike a shell company, a shelf company has been created months or years ahead of time, often by a law firm or an accounting firm. |
| 2646f244ebcf-b2ae-47eb-84fb-1b0a89903d5a | Not Translated (0%) | Then the company goes “on the shelf” until needed. | Then the company goes “on the shelf” until needed. |
| 2647f244ebcf-b2ae-47eb-84fb-1b0a89903d5a | Not Translated (0%) | A company with an older date of incorporation often seems more reliable and is less likely to raise red flags. | A company with an older date of incorporation often seems more reliable and is less likely to raise red flags. |
| 2648f244ebcf-b2ae-47eb-84fb-1b0a89903d5a | Not Translated (0%) | Jurisdictions that have more relaxed corporate laws can provide easy access to this setup through local attorneys or government officials. | Jurisdictions that have more relaxed corporate laws can provide easy access to this setup through local attorneys or government officials. |
| 2649f8da46f9-b931-4ba2-bf5a-1cc33a4bf1b7 | Not Translated (0%) | To detect attempts at evasion, employees and owners of a business must understand the nature, purpose, and structure of its customers’ and counterparties’ relationships and the reasons for the activities they engage in. When we understand who owns and controls our customers, we can better discern whether the proposed business makes sense for their business model—or whether there could be another motive for a customer’s behavior. | To detect attempts at evasion, employees and owners of a business must understand the nature, purpose, and structure of its customers’ and counterparties’ relationships and the reasons for the activities they engage in. When we understand who owns and controls our customers, we can better discern whether the proposed business makes sense for their business model—or whether there could be another motive for a customer’s behavior. |
| 2650f8da46f9-b931-4ba2-bf5a-1cc33a4bf1b7 | Not Translated (0%) | The example of ZTE Corporation shows the need for this understanding. | The example of ZTE Corporation shows the need for this understanding. |
| 26515748bebd-d77e-4287-bb09-e5e00fb2b42e | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 26525748bebd-d77e-4287-bb09-e5e00fb2b42e | Not Translated (0%) | ZTE CORPORATION, 2018 | ZTE CORPORATION, 2018 |
| 26539c2d3acf-eaa4-45e5-8a18-f45256b76f9d | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 2654a6248afb-b6ab-4673-899d-8ad52acccd15 | Not Translated (0%) | ZTE is China’s second-largest telecom equipment company. | ZTE is China’s second-largest telecom equipment company. |
| 2655a6248afb-b6ab-4673-899d-8ad52acccd15 | Not Translated (0%) | The United States government imposed a trading ban on the company after it breached US sanctions on trade with Iran and North Korea and pleaded guilty to criminal conduct in conspiring to violate the International Emergency Economic Powers Act (IEEPA). | The United States government imposed a trading ban on the company after it breached US sanctions on trade with Iran and North Korea and pleaded guilty to criminal conduct in conspiring to violate the International Emergency Economic Powers Act (IEEPA). |
| 2656a6248afb-b6ab-4673-899d-8ad52acccd15 | Not Translated (0%) | After the ban, the company nearly collapsed. | After the ban, the company nearly collapsed. |
| 2657a6248afb-b6ab-4673-899d-8ad52acccd15 | Not Translated (0%) | ZTE paid a $1 billion fine and put another $400 million in escrow. | ZTE paid a $1 billion fine and put another $400 million in escrow. |
| 2658a6248afb-b6ab-4673-899d-8ad52acccd15 | Not Translated (0%) | It remained under close scrutiny even after these payments. | It remained under close scrutiny even after these payments. |
| 2659e840542d-7bc8-4ed6-bcfc-63eaa5636104 | Not Translated (0%) | Between 2010 and 2016, ZTE contracted with Iranian companies to supply telecommunications equipment. | Between 2010 and 2016, ZTE contracted with Iranian companies to supply telecommunications equipment. |
| 2660e840542d-7bc8-4ed6-bcfc-63eaa5636104 | Not Translated (0%) | To hide the illegal export of US goods to Iran, ZTE identified a company by the name of Beijing 8 Star (8S). | To hide the illegal export of US goods to Iran, ZTE identified a company by the name of Beijing 8 Star (8S). |
| 2661e840542d-7bc8-4ed6-bcfc-63eaa5636104 | Not Translated (0%) | This company was intended to serve as an isolation company and purchase the US goods, reselling them to ZTE for later transfer to Iran. | This company was intended to serve as an isolation company and purchase the US goods, reselling them to ZTE for later transfer to Iran. |
| 2662e840542d-7bc8-4ed6-bcfc-63eaa5636104 | Not Translated (0%) | ZTE supplied 8S with capital and took control of the company to bring this about. | ZTE supplied 8S with capital and took control of the company to bring this about. |
| 266380a28f5c-a36f-46dc-8ca9-66c9c54f6f34 | Not Translated (0%) | ZTE agreed to supply the “self-developed equipment” to Iran, collect payments for the projects, and manage the network. | ZTE agreed to supply the “self-developed equipment” to Iran, collect payments for the projects, and manage the network. |
| 266480a28f5c-a36f-46dc-8ca9-66c9c54f6f34 | Not Translated (0%) | ZTE affiliate ZTE Parsian was to supply local materials and services. | ZTE affiliate ZTE Parsian was to supply local materials and services. |
| 266580a28f5c-a36f-46dc-8ca9-66c9c54f6f34 | Not Translated (0%) | 8S was responsible for “relevant third-party equipment,” meaning parts that would be subject to US export laws. | 8S was responsible for “relevant third-party equipment,” meaning parts that would be subject to US export laws. |
| 266680a28f5c-a36f-46dc-8ca9-66c9c54f6f34 | Not Translated (0%) | ZTE intended for 8S to insulate ZTE from US export violations. | ZTE intended for 8S to insulate ZTE from US export violations. |
| 2667e5767149-c9b5-4f62-b063-f1022804499f | Not Translated (0%) | In spite of the plan, and although 8S was a party to the contracts, ZTE purchased and shipped the US goods. | In spite of the plan, and although 8S was a party to the contracts, ZTE purchased and shipped the US goods. |
| 2668e5767149-c9b5-4f62-b063-f1022804499f | Not Translated (0%) | They packaged the items with ZTE’s self-manufactured items to hide the US– origin goods. | They packaged the items with ZTE’s self-manufactured items to hide the US– origin goods. |
| 2669e5767149-c9b5-4f62-b063-f1022804499f | Not Translated (0%) | ZTE did not list US items on the customs declaration forms, though the items were included on the packing lists inside the shipments. | ZTE did not list US items on the customs declaration forms, though the items were included on the packing lists inside the shipments. |
| 2670450a5586-4d6d-4a7d-9969-9dd9c66cde00 | Not Translated (0%) | In 2011 ZTE determined that the use of 8S was not enough to hide ZTE’s illegal goods to Iran. | In 2011 ZTE determined that the use of 8S was not enough to hide ZTE’s illegal goods to Iran. |
| 2671450a5586-4d6d-4a7d-9969-9dd9c66cde00 | Not Translated (0%) | ZTE’s senior management created a project team to study, handle, and address the company’s export control risks, and in September 2011, an executive memo proposed that the company identify and establish new “isolation companies” to supply US parts necessary for projects in embargoed countries. | ZTE’s senior management created a project team to study, handle, and address the company’s export control risks, and in September 2011, an executive memo proposed that the company identify and establish new “isolation companies” to supply US parts necessary for projects in embargoed countries. |
| 2672450a5586-4d6d-4a7d-9969-9dd9c66cde00 | Not Translated (0%) | These isolation companies would conceal ZTE’s role in the transshipment scheme and protect ZTE from sanctions control risks. | These isolation companies would conceal ZTE’s role in the transshipment scheme and protect ZTE from sanctions control risks. |
| 267365f1c370-2ac6-4b46-ad02-2b94974bcfd0 | Not Translated (0%) | In March 2012, an article was published detailing ZTE’s sale of equipment to Iran. | In March 2012, an article was published detailing ZTE’s sale of equipment to Iran. |
| 267465f1c370-2ac6-4b46-ad02-2b94974bcfd0 | Not Translated (0%) | In the face of this attention, ZTE temporarily stopped shipment of US goods to Iran. | In the face of this attention, ZTE temporarily stopped shipment of US goods to Iran. |
| 267565f1c370-2ac6-4b46-ad02-2b94974bcfd0 | Not Translated (0%) | This pause lasted less than two years, however, before ZTE resumed business with Iran. | This pause lasted less than two years, however, before ZTE resumed business with Iran. |
| 2676189f39bb-32e1-49f7-adb2-8108df1b7ff1 | Not Translated (0%) | At no stage did ZTE obtain the necessary export licenses from US authorities. | At no stage did ZTE obtain the necessary export licenses from US authorities. |
| 2677189f39bb-32e1-49f7-adb2-8108df1b7ff1 | Not Translated (0%) | Instead of using 8S, ZTE signed a contract with a new isolation company, which in turn signed contracts with the Iranian customers. | Instead of using 8S, ZTE signed a contract with a new isolation company, which in turn signed contracts with the Iranian customers. |
| 2678189f39bb-32e1-49f7-adb2-8108df1b7ff1 | Not Translated (0%) | In this arrangement, ZTE purchased the US goods and manufactured the balance, and then it combined them all for the new isolation company to pick up and ship to Iran. | In this arrangement, ZTE purchased the US goods and manufactured the balance, and then it combined them all for the new isolation company to pick up and ship to Iran. |
| 2679189f39bb-32e1-49f7-adb2-8108df1b7ff1 | Not Translated (0%) | Shipments were made in this way from January 2014 through January 2016. | Shipments were made in this way from January 2014 through January 2016. |
| 268077841749-bd22-4142-90b5-0da0b0217630 | Not Translated (0%) | Throughout this period ZTE took deliberate steps to conceal information from the US government, in spite of the company’s awareness of various investigations. | Throughout this period ZTE took deliberate steps to conceal information from the US government, in spite of the company’s awareness of various investigations. |
| 268177841749-bd22-4142-90b5-0da0b0217630 | Not Translated (0%) | In the summer of 2012, ZTE asked each of the employees who were involved in the Iran sales to sign nondisclosure agreements in which the employees agreed to keep confidential all information related to the company’s US exports to Iran. | In the summer of 2012, ZTE asked each of the employees who were involved in the Iran sales to sign nondisclosure agreements in which the employees agreed to keep confidential all information related to the company’s US exports to Iran. |
| 268277841749-bd22-4142-90b5-0da0b0217630 | Not Translated (0%) | ZTE made repeated false statements to internal and external counsel that resulted in false representations to the DOJ. | ZTE made repeated false statements to internal and external counsel that resulted in false representations to the DOJ. |
| 268377841749-bd22-4142-90b5-0da0b0217630 | Not Translated (0%) | ZTE also concealed data from a forensic accounting firm hired to investigate the Iran sales and report to the DOJ and US law enforcement. | ZTE also concealed data from a forensic accounting firm hired to investigate the Iran sales and report to the DOJ and US law enforcement. |
| 268477841749-bd22-4142-90b5-0da0b0217630 | Not Translated (0%) | The company formed a special internal department to remove all information related to the Iran shipments from ZTE’s databases. | The company formed a special internal department to remove all information related to the Iran shipments from ZTE’s databases. |
| 268577841749-bd22-4142-90b5-0da0b0217630 | Not Translated (0%) | This team’s emails were automatically deleted each night to remove all communications related to the database deletions. | This team’s emails were automatically deleted each night to remove all communications related to the database deletions. |
| 2686b84c6ddc-7316-43b3-85e2-3ef8ec657b34 | Not Translated (0%) | “Chinese telecom giant to pay $1 billion in Iran sanctions case,” Radio Free Europe/Radio Liberty, June 8, 2018. | “Chinese telecom giant to pay $1 billion in Iran sanctions case,” Radio Free Europe/Radio Liberty, June 8, 2018. |
| 268741186a99-73d6-4a23-819a-79956438b617 | Not Translated (0%) | , | , |
| 26886e33d386-08b0-47d4-ae89-c0c5908c47f3 | Not Translated (0%) | David J. Lynch, “U.S. companies banned from selling to China’s ZTE telecom maker,” Washington Post, April 16, 2018. | David J. Lynch, “U.S. companies banned from selling to China’s ZTE telecom maker,” Washington Post, April 16, 2018. |
| 26892fe089b6-8b92-4b85-a61e-575baea2eaeb | Not Translated (0%) | , | , |
| 269088513658-fd77-47a4-9d80-3851c0ca9672 | Not Translated (0%) | “United States of America v. ZTE Corporation plea agreement,” US District Court for the Northern District of Texas, March 6, 2017. | “United States of America v. ZTE Corporation plea agreement,” US District Court for the Northern District of Texas, March 6, 2017. |
| 2691530922e9-c5dc-46b3-99a1-e50518997974 | Not Translated (0%) | , | , |
| 2692e9dcb78d-0fcc-4e00-84f0-a73e52482c5d | Not Translated (0%) | “ZTE Corporation agrees to plead guilty and pay over $430.4 million for violating U.S. sanctions by sending U.S.–origin items to Iran,” US Department of Justice, March 7, 2017. | “ZTE Corporation agrees to plead guilty and pay over $430.4 million for violating U.S. sanctions by sending U.S.–origin items to Iran,” US Department of Justice, March 7, 2017. |
| 2693582bd466-f42e-4ffa-b663-d891bae4048b | Not Translated (0%) | The root causes of the noncompliance included: | The root causes of the noncompliance included: |
| 26945c2806ec-cd04-4ff3-bde0-086c34796e09 | Not Translated (0%) | Deliberate structuring of the business to avoid export controls and sanctions | Deliberate structuring of the business to avoid export controls and sanctions |
| 2695822cf87c-f7c5-4316-a568-3b057c5fc28b | Not Translated (0%) | Lack of a compliance culture within the firm | Lack of a compliance culture within the firm |
| 2696da7bd358-f00b-4606-a72d-f9550933b4ed | Not Translated (0%) | Lack of an internal sanctions compliance regime | Lack of an internal sanctions compliance regime |
| 26977253f913-2f7d-4c27-9bfc-45830190f094 | Not Translated (0%) | Failure to appreciate the seriousness of the acts of evasion being committed and the potential consequences once exposed | Failure to appreciate the seriousness of the acts of evasion being committed and the potential consequences once exposed |
| 2698e5675606-60a8-4c60-8848-463f25aa32d6 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 26991e44d2d5-1221-4b71-bbf9-2be2375dad2c | Not Translated (0%) | The US companies that sold parts to ZTE should have conducted more in-depth due diligence on the other parties to the sales contracts. | The US companies that sold parts to ZTE should have conducted more in-depth due diligence on the other parties to the sales contracts. |
| 27001e44d2d5-1221-4b71-bbf9-2be2375dad2c | Not Translated (0%) | The US companies could have seen the connections to the isolation companies and could have questioned the structure of the sales. | The US companies could have seen the connections to the isolation companies and could have questioned the structure of the sales. |
| 2701fee2c37d-7806-4e00-8438-81f23f89a1f8 | Not Translated (0%) | The regulators showed that there will be serious consequences for institutions that fail to cooperate with authorities, that conceal information deliberately, and that demonstrate evasion tactics repeatedly. | The regulators showed that there will be serious consequences for institutions that fail to cooperate with authorities, that conceal information deliberately, and that demonstrate evasion tactics repeatedly. |
| 2702b242b71b-6b59-497c-bbf8-1bb956128b4d | Not Translated (0%) | Staff must always apply the controls designed to reduce sanctions risks. | Staff must always apply the controls designed to reduce sanctions risks. |
| 2703b242b71b-6b59-497c-bbf8-1bb956128b4d | Not Translated (0%) | If someone is concerned about other staff members trying to evade or circumvent internal controls, that person should immediately escalate the matter to a line manager. | If someone is concerned about other staff members trying to evade or circumvent internal controls, that person should immediately escalate the matter to a line manager. |
| 27049eeaed32-b3d7-43d4-94f8-e8465c879043 | Not Translated (0%) | RED FLAGS | RED FLAGS |
| 270582f04dc9-0dbc-4eac-a5d4-b58effced457 | Not Translated (0%) | In summary, here are some examples of red flags that could signal trade-related evasion techniques: | In summary, here are some examples of red flags that could signal trade-related evasion techniques: |
| 27060bae3d7d-0c42-4fcd-bf37-b3b1f58c20c2 | Not Translated (0%) | Concealing identity: | Concealing identity: |
| 27070bae3d7d-0c42-4fcd-bf37-b3b1f58c20c2 | Not Translated (0%) | The customer’s name or address is similar to the name or address of a party on the BIS list of denied persons. | The customer’s name or address is similar to the name or address of a party on the BIS list of denied persons. |
| 27085c130efc-63ad-4687-9ad2-4017f2d919bb | Not Translated (0%) | Concealing restricted goods as non-restricted: | Concealing restricted goods as non-restricted: |
| 27095c130efc-63ad-4687-9ad2-4017f2d919bb | Not Translated (0%) | The customer is reluctant to offer information on the end use of the goods. | The customer is reluctant to offer information on the end use of the goods. |
| 271014279035-56ae-4eea-9f2b-48e27597d7e5 | Not Translated (0%) | Misuse of a front or shell company, example 1: | Misuse of a front or shell company, example 1: |
| 271114279035-56ae-4eea-9f2b-48e27597d7e5 | Not Translated (0%) | The goods do not fit the buyer’s line of business. | The goods do not fit the buyer’s line of business. |
| 2712724050a1-74a4-4be0-8700-e6838a76c797 | Not Translated (0%) | Misuse of a front or shell company, example 2: | Misuse of a front or shell company, example 2: |
| 2713724050a1-74a4-4be0-8700-e6838a76c797 | Not Translated (0%) | The customer has little or no business background. | The customer has little or no business background. |
| 2714994349f2-5c1a-4ab4-bd8f-ac86da7bd751 | Not Translated (0%) | Misuse of a front or shell company, example 3: | Misuse of a front or shell company, example 3: |
| 2715994349f2-5c1a-4ab4-bd8f-ac86da7bd751 | Not Translated (0%) | The customer is unfamiliar with the product’s performance characteristics but still wants the product. | The customer is unfamiliar with the product’s performance characteristics but still wants the product. |
| 2716a6e5079c-f8d8-4c9a-ac75-d0f2ad1c4536 | Not Translated (0%) | Concealing the end-user, the final destination, or both, example 1: | Concealing the end-user, the final destination, or both, example 1: |
| 2717a6e5079c-f8d8-4c9a-ac75-d0f2ad1c4536 | Not Translated (0%) | Delivery dates are vague, or deliveries are planned for out-of-the-way destinations. | Delivery dates are vague, or deliveries are planned for out-of-the-way destinations. |
| 271865e00fe1-f306-41f0-a423-3b62f0309d82 | Not Translated (0%) | Concealing the end user, the final destination, or both, example 2: | Concealing the end user, the final destination, or both, example 2: |
| 271965e00fe1-f306-41f0-a423-3b62f0309d82 | Not Translated (0%) | A freight-forwarding firm is listed as the product’s end user or destination. | A freight-forwarding firm is listed as the product’s end user or destination. |
| 27207f011e7f-1edc-41a3-9da4-982cc5d0e014 | Not Translated (0%) | Concealing the final destination or transshipment: | Concealing the final destination or transshipment: |
| 27217f011e7f-1edc-41a3-9da4-982cc5d0e014 | Not Translated (0%) | The shipping route is abnormal for the product or the destination. | The shipping route is abnormal for the product or the destination. |
| 272202a96725-48e8-473d-b27b-a8f043fffc78 | Not Translated (0%) | Concealing the end-use, the end-user, or both: | Concealing the end-use, the end-user, or both: |
| 272302a96725-48e8-473d-b27b-a8f043fffc78 | Not Translated (0%) | When questioned, the customer is evasive or unclear about whether the goods are for domestic use, export, or re-export. | When questioned, the customer is evasive or unclear about whether the goods are for domestic use, export, or re-export. |
| 272433b72f3f-747d-4fa2-9de2-229c60a93441 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 272533b72f3f-747d-4fa2-9de2-229c60a93441 | Not Translated (0%) | OCEAN MARITIME MANAGEMENT, 2014 | OCEAN MARITIME MANAGEMENT, 2014 |
| 2726de5d670d-1ff2-44d3-84bb-053d0c599776 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 27279c957c94-7de9-46e6-bf62-d3821e88fa07 | Not Translated (0%) | In July 2014, Ocean Maritime Management (OMM) and Chong Chon Gang Shipping company, both North Korean companies, were listed as sanctioned entities. | In July 2014, Ocean Maritime Management (OMM) and Chong Chon Gang Shipping company, both North Korean companies, were listed as sanctioned entities. |
| 27289c957c94-7de9-46e6-bf62-d3821e88fa07 | Not Translated (0%) | They were sanctioned by the US Department of the Treasury under Executive Order 13551, which expanded the scope of previous North Korea–related sanctions in response to North Korea’s nuclear test, missile launches in 2009, and the sinking of a South Korean naval vessel, the <5975>Cheonan</5975>, which killed 46 sailors in March 2010. | They were sanctioned by the US Department of the Treasury under Executive Order 13551, which expanded the scope of previous North Korea–related sanctions in response to North Korea’s nuclear test, missile launches in 2009, and the sinking of a South Korean naval vessel, the <5975>Cheonan</5975>, which killed 46 sailors in March 2010. |
| 27299c957c94-7de9-46e6-bf62-d3821e88fa07 | Not Translated (0%) | The sanctions targeted imports of arms and related materiel by North Korea, as well as money laundering and luxury goods. | The sanctions targeted imports of arms and related materiel by North Korea, as well as money laundering and luxury goods. |
| 27309c957c94-7de9-46e6-bf62-d3821e88fa07 | Not Translated (0%) | The United Nations also sanctioned them in July 2014 under the North Korea sanctions regime for concealing a shipment of arms and related goods from Cuba to North Korea aboard the vessel <5976>Chong Chon Gang </5976>in July 2013. | The United Nations also sanctioned them in July 2014 under the North Korea sanctions regime for concealing a shipment of arms and related goods from Cuba to North Korea aboard the vessel <5976>Chong Chon Gang </5976>in July 2013. |
| 27319b055701-1b2d-42d2-b2cf-6ca301110ad1 | Not Translated (0%) | The ship contained components of surface-to-air missile systems and launchers, MiG-21 fighter jet parts and engines, shell casings, rocket-propelled projectiles, and other ammunition. | The ship contained components of surface-to-air missile systems and launchers, MiG-21 fighter jet parts and engines, shell casings, rocket-propelled projectiles, and other ammunition. |
| 27329b055701-1b2d-42d2-b2cf-6ca301110ad1 | Not Translated (0%) | The cargo was falsely declared to be sugar and “spare plastic sacks” and was camouflaged under bags of sugar within the ship. | The cargo was falsely declared to be sugar and “spare plastic sacks” and was camouflaged under bags of sugar within the ship. |
| 27339b055701-1b2d-42d2-b2cf-6ca301110ad1 | Not Translated (0%) | The crew was also directed to prepare a false declaration to present at the Panama Canal, actions which were viewed as further evidence of intent to deceive and evade US and UN sanctions. | The crew was also directed to prepare a false declaration to present at the Panama Canal, actions which were viewed as further evidence of intent to deceive and evade US and UN sanctions. |
| 27349b58189b-e17a-48f4-b058-9fc888dd92e5 | Not Translated (0%) | OMM had operations in 10 countries. | OMM had operations in 10 countries. |
| 27359b58189b-e17a-48f4-b058-9fc888dd92e5 | Not Translated (0%) | In 2015, the United Nations noted that as a result of this listing, OMM renamed 13 of its 14 ships and transferred ownership to shell corporations in an attempt to evade sanctions. | In 2015, the United Nations noted that as a result of this listing, OMM renamed 13 of its 14 ships and transferred ownership to shell corporations in an attempt to evade sanctions. |
| 27369b58189b-e17a-48f4-b058-9fc888dd92e5 | Not Translated (0%) | Because of these actions, both company names and vessel names would no longer appear on sanctions filters. | Because of these actions, both company names and vessel names would no longer appear on sanctions filters. |
| 27379b58189b-e17a-48f4-b058-9fc888dd92e5 | Not Translated (0%) | Therefore, assets would not be frozen and transactions would not be blocked. | Therefore, assets would not be frozen and transactions would not be blocked. |
| 27389b58189b-e17a-48f4-b058-9fc888dd92e5 | Not Translated (0%) | The UN Security Council reviewed these reports of renaming, and experts emphasized the importance of monitoring and updating new names for sanctioned entities and vessels. | The UN Security Council reviewed these reports of renaming, and experts emphasized the importance of monitoring and updating new names for sanctioned entities and vessels. |
| 2739f5f3c9a0-4f15-490c-a43a-5dd27a127e80 | Not Translated (0%) | “North Korea reflagging ships to evade sanctions—UN,” BBC News, February 26, 2015. | “North Korea reflagging ships to evade sanctions—UN,” BBC News, February 26, 2015. |
| 2740afed434b-600a-487b-a93c-53740d72bb9f | Not Translated (0%) | , | , |
| 274107359483-9df5-4dff-8ffc-dd23b35cb484 | Not Translated (0%) | “Ocean Maritime Management Company, Limited (OMM),” United Nations Security Council. | “Ocean Maritime Management Company, Limited (OMM),” United Nations Security Council. |
| 27427ab560a0-cc23-4f3e-b083-1ae3f766ef9c | Not Translated (0%) | , | , |
| 274300191cec-197f-45fd-abff-0d16cd3feb08 | Not Translated (0%) | “Treasury sanctions DPRK shipping companies involved in illicit arms transfers,” US Department of the Treasury, July 30, 2014. | “Treasury sanctions DPRK shipping companies involved in illicit arms transfers,” US Department of the Treasury, July 30, 2014. |
| 27443b0623fb-6535-4966-8061-80cc474b0d41 | Not Translated (0%) | The root causes of the noncompliance included: | The root causes of the noncompliance included: |
| 274544c40d78-6aad-4c22-a23c-08c72e270948 | Not Translated (0%) | Intent to evade sanctions—specifically the red-flag actions of concealing identity by renaming ships, misusing shell corporations, and concealing restricted goods as non-restricted | Intent to evade sanctions—specifically the red-flag actions of concealing identity by renaming ships, misusing shell corporations, and concealing restricted goods as non-restricted |
| 274691b7c4b9-5ff8-4f98-8ecb-f39a7d8f4316 | Not Translated (0%) | Self-interest | Self-interest |
| 2747ce2d0905-1d02-4936-9e86-08fed65c3403 | Not Translated (0%) | Possible patriotic or political reasons (both companies are owned and based in North Korea) | Possible patriotic or political reasons (both companies are owned and based in North Korea) |
| 2748ec8d1276-284d-43ed-94d3-e569eea8f74c | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 2749a71f8c04-efd8-4662-aa9a-f8510cba5ae6 | Not Translated (0%) | Screening International Maritime Organization (IMO) numbers is an important part of the overall process in transactions that involve ships since IMO numbers do not change. | Screening International Maritime Organization (IMO) numbers is an important part of the overall process in transactions that involve ships since IMO numbers do not change. |
| 2750041d0dde-1e22-41e3-9b2e-e5839999ba76 | Not Translated (0%) | Those with a motive to circumvent sanctions will use whatever opportunities exist, including disguising shipments and falsifying documents, in order to evade detection. | Those with a motive to circumvent sanctions will use whatever opportunities exist, including disguising shipments and falsifying documents, in order to evade detection. |
| 275106758c2d-c66e-428b-9571-08559b79f4d0 | Not Translated (0%) | Misuse of shell companies and transfer of ownership can make it challenging to detect sanctions evaders. | Misuse of shell companies and transfer of ownership can make it challenging to detect sanctions evaders. |
| 2752f67e780d-ffc2-4d4d-9ba0-11e82a04d854 | Not Translated (0%) | The ability of the company and its vessels to change name and ownership shows how fragile detection methods are and how important it is to ensure that an organization updates its lists and information frequently. | The ability of the company and its vessels to change name and ownership shows how fragile detection methods are and how important it is to ensure that an organization updates its lists and information frequently. |
| 2753a9703c83-2d11-4944-adda-d40d1894c233 | Not Translated (0%) | Concealment of Beneficial Ownership | Concealment of Beneficial Ownership |
| 27548ad5aa01-54fb-4f54-9316-62c32bfd702c | Not Translated (0%) | The most challenging method of evasion can be concealment of ownership and control information. | The most challenging method of evasion can be concealment of ownership and control information. |
| 27558ad5aa01-54fb-4f54-9316-62c32bfd702c | Not Translated (0%) | Sanctioned individuals and entities will often try to conceal their ownership of various business interests so that those business interests can establish accounts and transact business in jurisdictions where they are sanctioned. | Sanctioned individuals and entities will often try to conceal their ownership of various business interests so that those business interests can establish accounts and transact business in jurisdictions where they are sanctioned. |
| 27568ad5aa01-54fb-4f54-9316-62c32bfd702c | Not Translated (0%) | For this reason, it is vital to correctly establish a customer’s ownership. | For this reason, it is vital to correctly establish a customer’s ownership. |
| 27578ad5aa01-54fb-4f54-9316-62c32bfd702c | Not Translated (0%) | This information must also be verified and updated periodically. | This information must also be verified and updated periodically. |
| 2758835cc773-c132-425d-aef9-4a15af826dfd | Not Translated (0%) | Using Different Names | Using Different Names |
| 2759acbed870-59eb-41c9-a91b-622b91d69436 | Not Translated (0%) | How do sanctions targets conceal their identity? | How do sanctions targets conceal their identity? |
| 2760acbed870-59eb-41c9-a91b-622b91d69436 | Not Translated (0%) | One way is through using different names. | One way is through using different names. |
| 2761acbed870-59eb-41c9-a91b-622b91d69436 | Not Translated (0%) | Changing the spelling, varying the order of names, or using a completely different name is a common tactic used to conceal or make it more difficult to establish an individual’s true identity. | Changing the spelling, varying the order of names, or using a completely different name is a common tactic used to conceal or make it more difficult to establish an individual’s true identity. |
| 2762acbed870-59eb-41c9-a91b-622b91d69436 | Not Translated (0%) | For instance, someone named Abu Mohamed al-Adnani might change parts of his name to Abou, Abu-Mohammad, al Adnani, and so on. | For instance, someone named Abu Mohamed al-Adnani might change parts of his name to Abou, Abu-Mohammad, al Adnani, and so on. |
| 2763acbed870-59eb-41c9-a91b-622b91d69436 | Not Translated (0%) | Or he might choose an entirely different alias. | Or he might choose an entirely different alias. |
| 276460ffdfcd-c920-443a-ad52-3616500eea16 | Not Translated (0%) | If a sanctioned counterparty wants to evade detection, they may change the spelling of their name slightly. | If a sanctioned counterparty wants to evade detection, they may change the spelling of their name slightly. |
| 276560ffdfcd-c920-443a-ad52-3616500eea16 | Not Translated (0%) | Or they may provide a false address that doesn’t exactly match the listed information. | Or they may provide a false address that doesn’t exactly match the listed information. |
| 276660ffdfcd-c920-443a-ad52-3616500eea16 | Not Translated (0%) | A sanctioned individual may act through a nominee, a relative, or a representative, making detection more difficult. | A sanctioned individual may act through a nominee, a relative, or a representative, making detection more difficult. |
| 276760ffdfcd-c920-443a-ad52-3616500eea16 | Not Translated (0%) | If the same counterparty is appearing multiple times during transactions, an organization may have an obligation to establish a customer relationship and apply additional due diligence, depending on the jurisdiction and the company’s policy. | If the same counterparty is appearing multiple times during transactions, an organization may have an obligation to establish a customer relationship and apply additional due diligence, depending on the jurisdiction and the company’s policy. |
| 276860ffdfcd-c920-443a-ad52-3616500eea16 | Not Translated (0%) | Due diligence regarding the customer should include the following: | Due diligence regarding the customer should include the following: |
| 2769ea5a8902-1fc4-41a2-8721-afb7d5dcffbd | Not Translated (0%) | Determining the parties with whom they will transact | Determining the parties with whom they will transact |
| 2770af0155ce-a6ea-46f8-b2ff-cba22f46f6bd | Not Translated (0%) | Understanding which customers (or types of customers) they target or market to | Understanding which customers (or types of customers) they target or market to |
| 277174507cb4-97fe-41f6-9bb6-8f9c6e5241be | Not Translated (0%) | Determining whether a static population of customers exists that can be reviewed or screened in advance | Determining whether a static population of customers exists that can be reviewed or screened in advance |
| 2772c038fbfa-d0df-4362-9eb2-7c2ab41ebe50 | Not Translated (0%) | Determining whether the customer’s behavior indicates attempts to evade sanctions, such as attempts to disguise company names so they will not appear when a financial organization screens the names against lists. | Determining whether the customer’s behavior indicates attempts to evade sanctions, such as attempts to disguise company names so they will not appear when a financial organization screens the names against lists. |
| 27730e986ea1-23ea-4956-b3e7-2293c9dc8793 | Not Translated (0%) | Another technique is to use generic names. | Another technique is to use generic names. |
| 27740e986ea1-23ea-4956-b3e7-2293c9dc8793 | Not Translated (0%) | The following is an example of a sanctions target listed on the EU sanctions list in relation to North Korea. | The following is an example of a sanctions target listed on the EU sanctions list in relation to North Korea. |
| 277589d1c6b4-7079-4ad2-9947-27e9c3052481 | Not Translated (0%) | “Foreign Trade Bank (FTB) is a State-owned bank and acts as the DPRK’s primary foreign exchange bank. | “Foreign Trade Bank (FTB) is a State-owned bank and acts as the DPRK’s primary foreign exchange bank. |
| 277689d1c6b4-7079-4ad2-9947-27e9c3052481 | Not Translated (0%) | It has provided key financial support to Kwangson Banking Corporation.” | It has provided key financial support to Kwangson Banking Corporation.” |
| 277757c93e05-8939-4b91-9a57-029675856c4e | Not Translated (0%) | Can you see how the use of this name might make its detection more difficult? | Can you see how the use of this name might make its detection more difficult? |
| 277857c93e05-8939-4b91-9a57-029675856c4e | Not Translated (0%) | A name like Foreign Trade Bank might be overlooked without further investigation. | A name like Foreign Trade Bank might be overlooked without further investigation. |
| 27791b01b6c5-55e7-4ca5-a6b5-7516c0a3c91d | Not Translated (0%) | Complex Corporate Ownership Arrangements | Complex Corporate Ownership Arrangements |
| 278093f82a09-dece-4c10-b0e5-c4f57b07bc63 | Not Translated (0%) | The second major technique used to conceal identity is through the use of complex corporate ownership schemes. | The second major technique used to conceal identity is through the use of complex corporate ownership schemes. |
| 278193f82a09-dece-4c10-b0e5-c4f57b07bc63 | Not Translated (0%) | It’s difficult to establish the identity of sanctions targets who are beneficiary owners when their ownership is held through a corporate structure. | It’s difficult to establish the identity of sanctions targets who are beneficiary owners when their ownership is held through a corporate structure. |
| 278293f82a09-dece-4c10-b0e5-c4f57b07bc63 | Not Translated (0%) | Getting to the bottom of these schemes is especially challenging when several different legal entities are part of the ownership chain. | Getting to the bottom of these schemes is especially challenging when several different legal entities are part of the ownership chain. |
| 278393f82a09-dece-4c10-b0e5-c4f57b07bc63 | Not Translated (0%) | Let’s look at some examples of how people and institutions use this tactic to evade sanctions. | Let’s look at some examples of how people and institutions use this tactic to evade sanctions. |
| 2784141e436d-e612-451e-a979-e32462bbe6c7 | Not Translated (0%) | Complex Corporate Ownership Schemes 1 | Complex Corporate Ownership Schemes 1 |
| 2785c52729ea-5575-4c91-95f0-8e1ce38c2f76 | Not Translated (0%) | The 50% ownership rule is important in both the United States and Europe. | The 50% ownership rule is important in both the United States and Europe. |
| 2786c52729ea-5575-4c91-95f0-8e1ce38c2f76 | Not Translated (0%) | In the United States, the rule is that when a business or other organization reviews the ownership of a customer or prospective customer, if that entity is owned at a 50% level or higher by a sanctioned individual or entity, it must also be considered sanctioned. | In the United States, the rule is that when a business or other organization reviews the ownership of a customer or prospective customer, if that entity is owned at a 50% level or higher by a sanctioned individual or entity, it must also be considered sanctioned. |
| 2787c52729ea-5575-4c91-95f0-8e1ce38c2f76 | Not Translated (0%) | The rule is similar in the EU, but the entity must be owned at a level higher than 50%. | The rule is similar in the EU, but the entity must be owned at a level higher than 50%. |
| 2788c52729ea-5575-4c91-95f0-8e1ce38c2f76 | Not Translated (0%) | The ownership can be direct or indirect, but the purpose of the rule is to identify legal entities through which the sanctioned entity or individual could conduct business and try to evade sanctions. | The ownership can be direct or indirect, but the purpose of the rule is to identify legal entities through which the sanctioned entity or individual could conduct business and try to evade sanctions. |
| 27890345ec14-2d54-4d17-9eb5-d2e810eeacf0 | Not Translated (0%) | The challenge is to establish who the owners or controllers are so that you can then determine whether any of them could be sanctions targets, and if so, whether they meet the 50% holdings rule. | The challenge is to establish who the owners or controllers are so that you can then determine whether any of them could be sanctions targets, and if so, whether they meet the 50% holdings rule. |
| 27900345ec14-2d54-4d17-9eb5-d2e810eeacf0 | Not Translated (0%) | Whenever a number of different owners are involved in a corporate structure, it can be a challenge to determine who the beneficial owners are and who has effective control over the entities involved. | Whenever a number of different owners are involved in a corporate structure, it can be a challenge to determine who the beneficial owners are and who has effective control over the entities involved. |
| 2791a7397290-6cb8-4f49-b58c-df67a1fd6089 | Not Translated (0%) | In this example, Person 5's ownership of Company A is hidden by a multi-layer corporate structure that distances his own name from that of Company A. | In this example, Person 5's ownership of Company A is hidden by a multi-layer corporate structure that distances his own name from that of Company A. |
| 279251cd93fe-3ea6-4b73-bca9-76a9511d6b57 | Not Translated (0%) | Complex Corporate Ownership Schemes 2 | Complex Corporate Ownership Schemes 2 |
| 2793a74b9add-4c88-423b-8574-3c38d4549f45 | Not Translated (0%) | Another way to conceal an owner’s identity is to use legal entities incorporated or established in jurisdictions where information on beneficial ownership is difficult to get. | Another way to conceal an owner’s identity is to use legal entities incorporated or established in jurisdictions where information on beneficial ownership is difficult to get. |
| 2794a74b9add-4c88-423b-8574-3c38d4549f45 | Not Translated (0%) | In some jurisdictions, the company register is not publicly accessible. | In some jurisdictions, the company register is not publicly accessible. |
| 2795a74b9add-4c88-423b-8574-3c38d4549f45 | Not Translated (0%) | In others, the register doesn’t include information about the beneficial owners of the companies listed on it. | In others, the register doesn’t include information about the beneficial owners of the companies listed on it. |
| 2796a74b9add-4c88-423b-8574-3c38d4549f45 | Not Translated (0%) | And in still other cases, it is possible to find out this information only by making a registrar request, which may not always be granted. | And in still other cases, it is possible to find out this information only by making a registrar request, which may not always be granted. |
| 2797c8296ba9-c0ae-4812-9eff-417a9694f054 | Not Translated (0%) | It’s also possible to conceal the identity of a corporation’s owners through bearer bonds or shares. | It’s also possible to conceal the identity of a corporation’s owners through bearer bonds or shares. |
| 2798c8296ba9-c0ae-4812-9eff-417a9694f054 | Not Translated (0%) | The records for these instruments don’t record the identity of the actual owner. | The records for these instruments don’t record the identity of the actual owner. |
| 2799c8296ba9-c0ae-4812-9eff-417a9694f054 | Not Translated (0%) | In theory, the owner of the legal entity is the party who physically holds the bearer share or bond certificate. | In theory, the owner of the legal entity is the party who physically holds the bearer share or bond certificate. |
| 2800c8296ba9-c0ae-4812-9eff-417a9694f054 | Not Translated (0%) | So the identity of the real owner is rarely, if ever, provided when a government or institution requests sanctions due diligence about the structure’s owners. | So the identity of the real owner is rarely, if ever, provided when a government or institution requests sanctions due diligence about the structure’s owners. |
| 2801e4d5a3de-35fa-45d4-98f9-74dbab103a85 | Not Translated (0%) | Luckily, the use of bearer bonds and shares has been in rapid decline and is largely discouraged for this reason. | Luckily, the use of bearer bonds and shares has been in rapid decline and is largely discouraged for this reason. |
| 2802e4d5a3de-35fa-45d4-98f9-74dbab103a85 | Not Translated (0%) | For example, since 2015, Swiss authorities have required that the holders of bearer shares in a Swiss company establish the identity of the real owner. | For example, since 2015, Swiss authorities have required that the holders of bearer shares in a Swiss company establish the identity of the real owner. |
| 2803e4d5a3de-35fa-45d4-98f9-74dbab103a85 | Not Translated (0%) | This information must be kept on a register and must include the identity of all individuals owning 25% or more of the shares. | This information must be kept on a register and must include the identity of all individuals owning 25% or more of the shares. |
| 28049c321d79-0782-431e-ac82-e7a3fe9810b1 | Not Translated (0%) | Dilution of Sanctioned Ownership | Dilution of Sanctioned Ownership |
| 2805c8a78ca9-54ea-4f07-89ff-cefa7ee9bfa5 | Not Translated (0%) | Complex ownership structures involving multiple entities in different jurisdictions can dilute the sanctioned ownership so that it falls below thresholds that would prevent trade. | Complex ownership structures involving multiple entities in different jurisdictions can dilute the sanctioned ownership so that it falls below thresholds that would prevent trade. |
| 2806c8a78ca9-54ea-4f07-89ff-cefa7ee9bfa5 | Not Translated (0%) | This dilution allows a sanctioned country or entity to avoid the restrictions the sanctions create. | This dilution allows a sanctioned country or entity to avoid the restrictions the sanctions create. |
| 2807c8a78ca9-54ea-4f07-89ff-cefa7ee9bfa5 | Not Translated (0%) | An example of this is Iran’s investments in Bahrain-based banking entities, which in turn fund Bahrain-based power companies. | An example of this is Iran’s investments in Bahrain-based banking entities, which in turn fund Bahrain-based power companies. |
| 2808c8a78ca9-54ea-4f07-89ff-cefa7ee9bfa5 | Not Translated (0%) | These banking entities and power companies can legitimately trade in Europe, while the Iranian State cannot. | These banking entities and power companies can legitimately trade in Europe, while the Iranian State cannot. |
| 2809c8a78ca9-54ea-4f07-89ff-cefa7ee9bfa5 | Not Translated (0%) | A web of subsidiaries, intermediaries, and authorized representatives ensure that—technically speaking—no sanctions are violated. | A web of subsidiaries, intermediaries, and authorized representatives ensure that—technically speaking—no sanctions are violated. |
| 2810c8a78ca9-54ea-4f07-89ff-cefa7ee9bfa5 | Not Translated (0%) | However, the result is that the sanctioned entity is able to obtain resources and goods to which the sanctions seek to block access. | However, the result is that the sanctioned entity is able to obtain resources and goods to which the sanctions seek to block access. |
| 28112eac8c49-8825-4bb0-b811-78a253da2b00 | Not Translated (0%) | Proxies or “Front” Parties | Proxies or “Front” Parties |
| 28129f1852f5-9fdd-4d24-9a3c-130ffc35ed47 | Not Translated (0%) | The next tactic involves the use of proxies. | The next tactic involves the use of proxies. |
| 28139f1852f5-9fdd-4d24-9a3c-130ffc35ed47 | Not Translated (0%) | This term refers to having someone else act as if they were the actual owner or controller of a fund, property, or business. | This term refers to having someone else act as if they were the actual owner or controller of a fund, property, or business. |
| 28149f1852f5-9fdd-4d24-9a3c-130ffc35ed47 | Not Translated (0%) | In some cases, even when you are able to obtain corporate records, they will contain only the names of nominee directors or shareholders. | In some cases, even when you are able to obtain corporate records, they will contain only the names of nominee directors or shareholders. |
| 28159f1852f5-9fdd-4d24-9a3c-130ffc35ed47 | Not Translated (0%) | These people are not the actual directors or shareholders. | These people are not the actual directors or shareholders. |
| 28169f1852f5-9fdd-4d24-9a3c-130ffc35ed47 | Not Translated (0%) | Instead, they are individuals appointed to act on behalf of these directors or shareholders. | Instead, they are individuals appointed to act on behalf of these directors or shareholders. |
| 28179f1852f5-9fdd-4d24-9a3c-130ffc35ed47 | Not Translated (0%) | This situation can happen in foundations, where the persons listed as the UBOs are actually legal representatives and not the true owners. | This situation can happen in foundations, where the persons listed as the UBOs are actually legal representatives and not the true owners. |
| 28189f1852f5-9fdd-4d24-9a3c-130ffc35ed47 | Not Translated (0%) | Although the use of nominee shareholders is also in rapid decline, the use of nominee directors is still common. | Although the use of nominee shareholders is also in rapid decline, the use of nominee directors is still common. |
| 2819f3b57ae5-fed0-4a25-a679-70062bf4fa44 | Not Translated (0%) | Sanctioned targets sometimes use straw men or “front men.” | Sanctioned targets sometimes use straw men or “front men.” |
| 2820f3b57ae5-fed0-4a25-a679-70062bf4fa44 | Not Translated (0%) | This is essentially a non-sanctioned person with a low public profile who acts for, or stands in the place of, a sanctions target. | This is essentially a non-sanctioned person with a low public profile who acts for, or stands in the place of, a sanctions target. |
| 2821f3b57ae5-fed0-4a25-a679-70062bf4fa44 | Not Translated (0%) | The straw man does not act in any real sense as an owner or controller. | The straw man does not act in any real sense as an owner or controller. |
| 2822f3b57ae5-fed0-4a25-a679-70062bf4fa44 | Not Translated (0%) | Instead, he or she carries out activities at the direction of the sanctions target, who is active in the background. | Instead, he or she carries out activities at the direction of the sanctions target, who is active in the background. |
| 2823f3b57ae5-fed0-4a25-a679-70062bf4fa44 | Not Translated (0%) | Often, a straw man will act as a consultant, commercial representative, or other similar role for the target. | Often, a straw man will act as a consultant, commercial representative, or other similar role for the target. |
| 2824f3b57ae5-fed0-4a25-a679-70062bf4fa44 | Not Translated (0%) | Straw men often take steps to ensure that there is no evidence of the sanctions target’s involvement with the legal entity. | Straw men often take steps to ensure that there is no evidence of the sanctions target’s involvement with the legal entity. |
| 2825f3b57ae5-fed0-4a25-a679-70062bf4fa44 | Not Translated (0%) | So there will generally not be any formal written agreements appointing a straw man. | So there will generally not be any formal written agreements appointing a straw man. |
| 28262db5b94c-5ea5-4292-b018-90a29b92f169 | Not Translated (0%) | Some evaders use front companies to violate trade restrictions. | Some evaders use front companies to violate trade restrictions. |
| 28272db5b94c-5ea5-4292-b018-90a29b92f169 | Not Translated (0%) | Front companies are also used in evasion tactics that are unrelated to trade. | Front companies are also used in evasion tactics that are unrelated to trade. |
| 28282db5b94c-5ea5-4292-b018-90a29b92f169 | Not Translated (0%) | In these instances, the front company conceals the identity of targets who are beneficial owners or controllers. | In these instances, the front company conceals the identity of targets who are beneficial owners or controllers. |
| 28292db5b94c-5ea5-4292-b018-90a29b92f169 | Not Translated (0%) | Evaders often use this tactic in combination with straw men or nominee directors. | Evaders often use this tactic in combination with straw men or nominee directors. |
| 2830aadf0749-a000-4fb5-a529-35a680b0259e | Not Translated (0%) | Finally, there is the use of isolation companies. | Finally, there is the use of isolation companies. |
| 2831aadf0749-a000-4fb5-a529-35a680b0259e | Not Translated (0%) | Similar to front companies, an isolation company helps evaders avoid the appearance of involvement of either a sanctioned entity or an entity that is trying to do business with a sanctions target. | Similar to front companies, an isolation company helps evaders avoid the appearance of involvement of either a sanctioned entity or an entity that is trying to do business with a sanctions target. |
| 2832aadf0749-a000-4fb5-a529-35a680b0259e | Not Translated (0%) | The main difference between a front company and an isolation company is that evaders choose an isolation company either for its past business activities or its lack of traceable connection to the entities involved in the evasive activity. | The main difference between a front company and an isolation company is that evaders choose an isolation company either for its past business activities or its lack of traceable connection to the entities involved in the evasive activity. |
| 2833dbcb760e-33ec-421c-92a8-df34b1ad8ffa | Not Translated (0%) | In 2017, the Chinese telecom giant ZTE agreed to pay a total fine of $892 million to several regulators for violating US sanctions on Iran and North Korea. | In 2017, the Chinese telecom giant ZTE agreed to pay a total fine of $892 million to several regulators for violating US sanctions on Iran and North Korea. |
| 2834dbcb760e-33ec-421c-92a8-df34b1ad8ffa | Not Translated (0%) | ZTE used several evasion tactics to export goods from the United States to Iran. | ZTE used several evasion tactics to export goods from the United States to Iran. |
| 2835dbcb760e-33ec-421c-92a8-df34b1ad8ffa | Not Translated (0%) | ZTE used third-party companies to conceal and facilitate its business with the two sanctioned jurisdictions. | ZTE used third-party companies to conceal and facilitate its business with the two sanctioned jurisdictions. |
| 2836dbcb760e-33ec-421c-92a8-df34b1ad8ffa | Not Translated (0%) | These isolation companies were intended to provide a pass-through or buffer and obscure ZTE’s shipment activity into, and with, Iran. | These isolation companies were intended to provide a pass-through or buffer and obscure ZTE’s shipment activity into, and with, Iran. |
| 2837dbcb760e-33ec-421c-92a8-df34b1ad8ffa | Not Translated (0%) | The companies had no previous commercial connection to ZTE. | The companies had no previous commercial connection to ZTE. |
| 2838a35c3678-3b59-4eea-b7de-4c23e31b5dcd | Not Translated (0%) | The isolation companies removed all evidence of ZTE’s involvement with the export activity. | The isolation companies removed all evidence of ZTE’s involvement with the export activity. |
| 2839a35c3678-3b59-4eea-b7de-4c23e31b5dcd | Not Translated (0%) | They removed ZTE’s logos and any references to ZTE from shipping documentation. | They removed ZTE’s logos and any references to ZTE from shipping documentation. |
| 2840a35c3678-3b59-4eea-b7de-4c23e31b5dcd | Not Translated (0%) | The goal was to make it look as though the isolation companies were the ones doing business with Iran. | The goal was to make it look as though the isolation companies were the ones doing business with Iran. |
| 2841b80881ff-a017-448e-8443-2ada61af600c | Not Translated (0%) | In this case, outside parties established and owned the isolation companies. | In this case, outside parties established and owned the isolation companies. |
| 2842b80881ff-a017-448e-8443-2ada61af600c | Not Translated (0%) | They weren’t a member of ZTE’s group of companies. | They weren’t a member of ZTE’s group of companies. |
| 2843b80881ff-a017-448e-8443-2ada61af600c | Not Translated (0%) | However, ZTE arranged with the owners to provide the companies with operating capital. | However, ZTE arranged with the owners to provide the companies with operating capital. |
| 2844b80881ff-a017-448e-8443-2ada61af600c | Not Translated (0%) | In exchange, the outside parties gave day-to-day control of the companies to ZTE. | In exchange, the outside parties gave day-to-day control of the companies to ZTE. |
| 2845b80881ff-a017-448e-8443-2ada61af600c | Not Translated (0%) | As a result, the isolation companies appeared as though they, and not ZTE, were doing business with sanctions targets. | As a result, the isolation companies appeared as though they, and not ZTE, were doing business with sanctions targets. |
| 2846416e4088-f084-4929-b498-d303913e57bb | Not Translated (0%) | Restructuring of Ownership Interests | Restructuring of Ownership Interests |
| 2847df300697-fcf5-4602-99a2-db577914f941 | Not Translated (0%) | Another evasion tactic is restructuring, which will be addressed in two respects—the divestment or “sale” of ownership interests and the reorganization of existing ownership interests. | Another evasion tactic is restructuring, which will be addressed in two respects—the divestment or “sale” of ownership interests and the reorganization of existing ownership interests. |
| 2848fbdd1c39-4011-4ff4-a9dc-596fa6a992de | Not Translated (0%) | DIVESTMENT OF OWNERSHIP INTERESTS | DIVESTMENT OF OWNERSHIP INTERESTS |
| 28496b679824-c1d7-46ed-bfdd-e6ff21e8de7c | Not Translated (0%) | The term sham divestments refer to transactions in which sanctions targets sell assets or equity to close associates or other affiliated persons. | The term sham divestments refer to transactions in which sanctions targets sell assets or equity to close associates or other affiliated persons. |
| 28506b679824-c1d7-46ed-bfdd-e6ff21e8de7c | Not Translated (0%) | These can include friends, colleagues, subordinates, business partners, and family members. | These can include friends, colleagues, subordinates, business partners, and family members. |
| 28516b679824-c1d7-46ed-bfdd-e6ff21e8de7c | Not Translated (0%) | Similar to using an isolation company, the idea is that the sanctions target no longer appears to “own” the asset or shares in a company. | Similar to using an isolation company, the idea is that the sanctions target no longer appears to “own” the asset or shares in a company. |
| 28526b679824-c1d7-46ed-bfdd-e6ff21e8de7c | Not Translated (0%) | However, the target continues to influence or control the asset or the company’s operations. | However, the target continues to influence or control the asset or the company’s operations. |
| 2853eb1d9ea0-3712-4bc5-82c8-94bd35e2d401 | Not Translated (0%) | The following is an example: | The following is an example: |
| 28549b48c063-8560-4f8b-9418-809b8b9c173f | Not Translated (0%) | Concealment of Identity 1 | Concealment of Identity 1 |
| 28550e4d0da6-2bd1-4cb7-b99d-c42ae89a44ec | Not Translated (0%) | Billionaire brothers Arkady and Boris Rotenberg are alleged to be close friends of Russian president Vladimir Putin. | Billionaire brothers Arkady and Boris Rotenberg are alleged to be close friends of Russian president Vladimir Putin. |
| 28560e4d0da6-2bd1-4cb7-b99d-c42ae89a44ec | Not Translated (0%) | The United States named both brothers as sanctions targets in early 2014. | The United States named both brothers as sanctions targets in early 2014. |
| 28570e4d0da6-2bd1-4cb7-b99d-c42ae89a44ec | Not Translated (0%) | The European Union also listed Boris as a sanctions target. | The European Union also listed Boris as a sanctions target. |
| 2858f01f4a21-9680-4b57-89a3-5f5b0c088cf6 | Not Translated (0%) | Several months after they were listed, Boris sold his 50% stake in a Finnish company called Arena Events Oy to his son Roman. | Several months after they were listed, Boris sold his 50% stake in a Finnish company called Arena Events Oy to his son Roman. |
| 2859f01f4a21-9680-4b57-89a3-5f5b0c088cf6 | Not Translated (0%) | This sale of his interest in Arena Events was an attempt to prevent the assets and activities of Arena from being restricted under the same sanctions that applied to Boris. | This sale of his interest in Arena Events was an attempt to prevent the assets and activities of Arena from being restricted under the same sanctions that applied to Boris. |
| 2860f01f4a21-9680-4b57-89a3-5f5b0c088cf6 | Not Translated (0%) | It was believed that Boris planned to continue to exercise full control over the company despite this divestment. | It was believed that Boris planned to continue to exercise full control over the company despite this divestment. |
| 28613b83d76c-a7e6-48e0-b3c7-e15325a6d567 | Not Translated (0%) | OFAC AND THE 50 PERCENT RULE | OFAC AND THE 50 PERCENT RULE |
| 28625827fbe5-df74-4950-ba28-16d078ec1ff5 | Not Translated (0%) | OFAC specifies that entities are blocked if one or more blocked persons owns a total of 50% of the entity—directly or indirectly. | OFAC specifies that entities are blocked if one or more blocked persons owns a total of 50% of the entity—directly or indirectly. |
| 28635827fbe5-df74-4950-ba28-16d078ec1ff5 | Not Translated (0%) | Any divestment transactions for such entities must take place outside of US jurisdiction and must not involve US persons. | Any divestment transactions for such entities must take place outside of US jurisdiction and must not involve US persons. |
| 28645827fbe5-df74-4950-ba28-16d078ec1ff5 | Not Translated (0%) | However, entities that have less than 50% ownership by blocked persons are not blocked, according to OFAC. | However, entities that have less than 50% ownership by blocked persons are not blocked, according to OFAC. |
| 28655827fbe5-df74-4950-ba28-16d078ec1ff5 | Not Translated (0%) | It is important to conduct due diligence to be certain that any alleged divestment actually happened and was not a sham transaction. | It is important to conduct due diligence to be certain that any alleged divestment actually happened and was not a sham transaction. |
| 2866dbbfb2aa-ab06-486b-ab31-7360e2d0fbc7 | Not Translated (0%) | What happens when the property of an entity blocked because of the 50 Percent Rule comes within the United States or comes within the control of a US person? | What happens when the property of an entity blocked because of the 50 Percent Rule comes within the United States or comes within the control of a US person? |
| 2867dbbfb2aa-ab06-486b-ab31-7360e2d0fbc7 | Not Translated (0%) | In that case, the property is blocked until one of these events takes place: | In that case, the property is blocked until one of these events takes place: |
| 28684ee168c9-ced7-4cd3-bce3-69f2d05c88e3 | Not Translated (0%) | OFAC allows the unblocking, or | OFAC allows the unblocking, or |
| 2869fdeb2858-aa3c-4544-a333-7385d5aa8da0 | Not Translated (0%) | OFAC takes the blocked person off the SDN list. | OFAC takes the blocked person off the SDN list. |
| 287089f09a8d-fd6f-49dd-92e3-9285dec95977 | Not Translated (0%) | Even if the blocked person’s ownership of the entity later falls below 50%, the property remains blocked. | Even if the blocked person’s ownership of the entity later falls below 50%, the property remains blocked. |
| 287189f09a8d-fd6f-49dd-92e3-9285dec95977 | Not Translated (0%) | Why? | Why? |
| 287289f09a8d-fd6f-49dd-92e3-9285dec95977 | Not Translated (0%) | OFAC considers the blocked person to have an interest in the blocked property. | OFAC considers the blocked person to have an interest in the blocked property. |
| 287389f09a8d-fd6f-49dd-92e3-9285dec95977 | Not Translated (0%) | Someone holding this type of property may ask for authorization from OFAC to transfer or otherwise deal in the property. | Someone holding this type of property may ask for authorization from OFAC to transfer or otherwise deal in the property. |
| 2874380ffbd2-abfa-4c2c-84fd-1ddc85b0b230 | Not Translated (0%) | Similarly, if the combined ownership of blocked persons in an entity falls below 50% because of actions by the blocked persons, then that property remains blocked according to OFAC. | Similarly, if the combined ownership of blocked persons in an entity falls below 50% because of actions by the blocked persons, then that property remains blocked according to OFAC. |
| 2875380ffbd2-abfa-4c2c-84fd-1ddc85b0b230 | Not Translated (0%) | However, if the ownership by blocked persons falls below 50% because OFAC has removed certain persons from the SDN list, then the entity is no longer blocked. | However, if the ownership by blocked persons falls below 50% because OFAC has removed certain persons from the SDN list, then the entity is no longer blocked. |
| 28768163060a-caa6-41fb-9ee9-119e25490bb4 | Not Translated (0%) | REORGANIZATION OF OWNERSHIP INTERESTS | REORGANIZATION OF OWNERSHIP INTERESTS |
| 2877fdb2251f-5659-4e16-86b1-4ae7349a3d64 | Not Translated (0%) | Finally, there’s the reorganization of existing ownership interests. | Finally, there’s the reorganization of existing ownership interests. |
| 2878fdb2251f-5659-4e16-86b1-4ae7349a3d64 | Not Translated (0%) | If the sanctions target divests its ownership stake in a company so that its total or aggregate ownership is less than 50%, then the entities involved may no longer be subject to sanctions restrictions. | If the sanctions target divests its ownership stake in a company so that its total or aggregate ownership is less than 50%, then the entities involved may no longer be subject to sanctions restrictions. |
| 2879fdb2251f-5659-4e16-86b1-4ae7349a3d64 | Not Translated (0%) | This tactic is designed to make it appear as if the sanctions target’s ownership falls below the 50% threshold. | This tactic is designed to make it appear as if the sanctions target’s ownership falls below the 50% threshold. |
| 2880fdb2251f-5659-4e16-86b1-4ae7349a3d64 | Not Translated (0%) | Sanctions targets use different strategies to make it appear that they no longer own or control legal entities to prevent government agencies from restricting their activities. | Sanctions targets use different strategies to make it appear that they no longer own or control legal entities to prevent government agencies from restricting their activities. |
| 2881acc402bf-1a16-4d90-9134-b867c99acebb | Not Translated (0%) | Here’s an example of reorganization of ownership interests. | Here’s an example of reorganization of ownership interests. |
| 2882acc402bf-1a16-4d90-9134-b867c99acebb | Not Translated (0%) | In 2014, shortly before being listed as an SDN on OFAC’s Crimea sanctions list, Bank Rossiya decreased its indirect stake in the SOGAZ insurance company from 51% to 48.5%. | In 2014, shortly before being listed as an SDN on OFAC’s Crimea sanctions list, Bank Rossiya decreased its indirect stake in the SOGAZ insurance company from 51% to 48.5%. |
| 2883acc402bf-1a16-4d90-9134-b867c99acebb | Not Translated (0%) | However, SOGAZ continued to be 12.5% owned by Gennady | However, SOGAZ continued to be 12.5% owned by Gennady |
| 2884a2e11ae9-0e3f-4fbd-a6f1-69a02dc20e29 | Not Translated (0%) | Concealment of Identity 2 | Concealment of Identity 2 |
| 2885700a103d-84f8-48c3-9118-e9a7d1764bc4 | Not Translated (0%) | Timchenko through an entity named Kordeks, also an OFAC SDN. | Timchenko through an entity named Kordeks, also an OFAC SDN. |
| 2886700a103d-84f8-48c3-9118-e9a7d1764bc4 | Not Translated (0%) | Following the introduction of the aggregate ownership rule by OFAC, Bank Rossiya’s subsidiary, ABRos, further reduced its ownership to 32.3%. | Following the introduction of the aggregate ownership rule by OFAC, Bank Rossiya’s subsidiary, ABRos, further reduced its ownership to 32.3%. |
| 2887700a103d-84f8-48c3-9118-e9a7d1764bc4 | Not Translated (0%) | As a result, both Bank Rossiya and Timchenko, through the entity Kordeks, owned, in total, less than 50% in SOGAZ. | As a result, both Bank Rossiya and Timchenko, through the entity Kordeks, owned, in total, less than 50% in SOGAZ. |
| 2888bf9e78f3-0c15-4ca0-beae-49ebbcf76297 | Not Translated (0%) | Ownership structures such as this show how challenging it can be for an organization to stay on top of its customer population, understand who it can and cannot do business with, and ensure that it stays compliant with all relevant laws. | Ownership structures such as this show how challenging it can be for an organization to stay on top of its customer population, understand who it can and cannot do business with, and ensure that it stays compliant with all relevant laws. |
| 2889bf9e78f3-0c15-4ca0-beae-49ebbcf76297 | Not Translated (0%) | In most jurisdictions, ownership changes can be completed quickly by simply filing the updated information with the proper authority or registry for a small fee. | In most jurisdictions, ownership changes can be completed quickly by simply filing the updated information with the proper authority or registry for a small fee. |
| 2890bf9e78f3-0c15-4ca0-beae-49ebbcf76297 | Not Translated (0%) | Sanctioned individuals intent on operating in the global financial system without restriction can reduce or conceal their ownership long enough to satisfy requirements and secure accounts or relationships with the banks they seek to deal with. | Sanctioned individuals intent on operating in the global financial system without restriction can reduce or conceal their ownership long enough to satisfy requirements and secure accounts or relationships with the banks they seek to deal with. |
| 2891bf9e78f3-0c15-4ca0-beae-49ebbcf76297 | Not Translated (0%) | Then they revert to a controlling interest in the account-holding entities until the next review of information takes place. | Then they revert to a controlling interest in the account-holding entities until the next review of information takes place. |
| 2892bf9e78f3-0c15-4ca0-beae-49ebbcf76297 | Not Translated (0%) | Until ownership information is governed globally, and a financial institution’s systems are capable of monitoring all changes, the ability to flag these entities is only as accurate as the last full review and verification of their ownership information. | Until ownership information is governed globally, and a financial institution’s systems are capable of monitoring all changes, the ability to flag these entities is only as accurate as the last full review and verification of their ownership information. |
| 28934de3f9dc-e8c9-4e82-bdb7-89cb69546d1f | Not Translated (0%) | What are the steps to take before considering doing business with an entity that is partly owned by a sanctioned individual or entity? | What are the steps to take before considering doing business with an entity that is partly owned by a sanctioned individual or entity? |
| 28944de3f9dc-e8c9-4e82-bdb7-89cb69546d1f | Not Translated (0%) | Even if the ownership percentage is well below the threshold, it makes sense to apply additional due diligence to the entity’s ownership history. | Even if the ownership percentage is well below the threshold, it makes sense to apply additional due diligence to the entity’s ownership history. |
| 28954de3f9dc-e8c9-4e82-bdb7-89cb69546d1f | Not Translated (0%) | It is vital to ensure the sanctioned individual or entity is not in effective control through a complex ownership scenario. | It is vital to ensure the sanctioned individual or entity is not in effective control through a complex ownership scenario. |
| 28964de3f9dc-e8c9-4e82-bdb7-89cb69546d1f | Not Translated (0%) | An organization must make sure the entity didn’t alter its ownership history before making contact with the organization. | An organization must make sure the entity didn’t alter its ownership history before making contact with the organization. |
| 2897d4b75fa7-671f-4416-a749-f337d7c04af7 | Not Translated (0%) | Final Note | Final Note |
| 28985491843c-2570-4aa5-9cba-5b3bb0ec2fdc | Not Translated (0%) | We’ve looked at a number of ways sanctioned entities and individuals seek to avoid government sanctions, restrictions, and prohibitions. | We’ve looked at a number of ways sanctioned entities and individuals seek to avoid government sanctions, restrictions, and prohibitions. |
| 28995491843c-2570-4aa5-9cba-5b3bb0ec2fdc | Not Translated (0%) | In some significant instances, some of these evaders have been successful for a time—often with the aid of major financial institutions and their employees. | In some significant instances, some of these evaders have been successful for a time—often with the aid of major financial institutions and their employees. |
| 29005491843c-2570-4aa5-9cba-5b3bb0ec2fdc | Not Translated (0%) | We’ve seen how important it is to have a robust sanctions screening program, with controls that take into account the motivations of those involved. | We’ve seen how important it is to have a robust sanctions screening program, with controls that take into account the motivations of those involved. |
| 29015491843c-2570-4aa5-9cba-5b3bb0ec2fdc | Not Translated (0%) | It is vital that senior management appreciate the importance of sanctions compliance so that the program can effectively operate within your business. | It is vital that senior management appreciate the importance of sanctions compliance so that the program can effectively operate within your business. |
| 29025491843c-2570-4aa5-9cba-5b3bb0ec2fdc | Not Translated (0%) | We’ve also seen that it’s necessary to regularly review, test, and update your sanctions screening program so it reflects the latest information in your jurisdiction. | We’ve also seen that it’s necessary to regularly review, test, and update your sanctions screening program so it reflects the latest information in your jurisdiction. |
| 29032c62bfbe-eb4d-4ad9-8241-5e95ca06b309 | Not Translated (0%) | Sanctions Due Diligence | Sanctions Due Diligence |
| 290405bf280c-3263-4319-8239-332a8e029171 | Not Translated (0%) | Perform Sanctions Due Diligence | Perform Sanctions Due Diligence |
| 2905e8911de8-4b35-4a3b-a1c2-bcb7580b0d74 | Not Translated (0%) | Today’s world involves increasingly complex laws, regulations, and policies. | Today’s world involves increasingly complex laws, regulations, and policies. |
| 2906e8911de8-4b35-4a3b-a1c2-bcb7580b0d74 | Not Translated (0%) | Add to that the variety of types and scopes of sanctions, and an organization should recognize the absolute need for an effective sanctions due diligence process to mitigate risk. | Add to that the variety of types and scopes of sanctions, and an organization should recognize the absolute need for an effective sanctions due diligence process to mitigate risk. |
| 29079b3fe56a-229c-4c1f-99fd-b65e9186fb9b | Not Translated (0%) | Know your customer (KYC) / Customer due diligence (CDD) is a set of internal controls that enable a financial institution to establish a customer’s identity, predict with relative certainty the types of transactions in which the customer is likely to engage, and assess the extent to which the customer exposes the institution to a range of risks (e.g., money laundering and sanctions). | Know your customer (KYC) / Customer due diligence (CDD) is a set of internal controls that enable a financial institution to establish a customer’s identity, predict with relative certainty the types of transactions in which the customer is likely to engage, and assess the extent to which the customer exposes the institution to a range of risks (e.g., money laundering and sanctions). |
| 29089b3fe56a-229c-4c1f-99fd-b65e9186fb9b | Not Translated (0%) | Note that in Europe, the terms KYC and CDD are used interchangeably, while in the US, there is a slight difference between KYC and CDD. | Note that in Europe, the terms KYC and CDD are used interchangeably, while in the US, there is a slight difference between KYC and CDD. |
| 29099b3fe56a-229c-4c1f-99fd-b65e9186fb9b | Not Translated (0%) | Organizations also need to know their customers through KYC to guard against fraud and to comply with the requirements of relevant legislation and regulation. | Organizations also need to know their customers through KYC to guard against fraud and to comply with the requirements of relevant legislation and regulation. |
| 29109b3fe56a-229c-4c1f-99fd-b65e9186fb9b | Not Translated (0%) | Effective KYC programs also help to protect banks’ reputation and the integrity of banking systems by reducing the likelihood of banks becoming a vehicle for, or a victim of, financial crime. | Effective KYC programs also help to protect banks’ reputation and the integrity of banking systems by reducing the likelihood of banks becoming a vehicle for, or a victim of, financial crime. |
| 29119b3fe56a-229c-4c1f-99fd-b65e9186fb9b | Not Translated (0%) | As such, these programs constitute an essential part of sound risk management. | As such, these programs constitute an essential part of sound risk management. |
| 29121e767292-81cd-4345-a2bf-75a2d06616ea | Not Translated (0%) | Sanctions due diligence (SDD) is related to KYC and focuses on the risks specific to sanctions, as sanctions regulations are not part of AML regulations. | Sanctions due diligence (SDD) is related to KYC and focuses on the risks specific to sanctions, as sanctions regulations are not part of AML regulations. |
| 29131e767292-81cd-4345-a2bf-75a2d06616ea | Not Translated (0%) | SDD includes establishing the identity of the customer and determining the customer’s beneficial ownership and controlling influences. | SDD includes establishing the identity of the customer and determining the customer’s beneficial ownership and controlling influences. |
| 29141e767292-81cd-4345-a2bf-75a2d06616ea | Not Translated (0%) | However, depending on the context, it may be more or less expansive than KYC. | However, depending on the context, it may be more or less expansive than KYC. |
| 29151e767292-81cd-4345-a2bf-75a2d06616ea | Not Translated (0%) | For example, SDD may not include AML–related information, such as the name of the primary regulator as identified in the Wolfsberg questionnaire or whether a person is a politically exposed person, but it may include a full understanding of the end user and supply chain. | For example, SDD may not include AML–related information, such as the name of the primary regulator as identified in the Wolfsberg questionnaire or whether a person is a politically exposed person, but it may include a full understanding of the end user and supply chain. |
| 29161e767292-81cd-4345-a2bf-75a2d06616ea | Not Translated (0%) | Importantly, it takes into account governance and risk assessment, which are described below. | Importantly, it takes into account governance and risk assessment, which are described below. |
| 29171e767292-81cd-4345-a2bf-75a2d06616ea | Not Translated (0%) | SDD utilizes and builds upon the valuable KYC information an organization collects as part of its existing AML program. | SDD utilizes and builds upon the valuable KYC information an organization collects as part of its existing AML program. |
| 29181e767292-81cd-4345-a2bf-75a2d06616ea | Not Translated (0%) | SDD is also applied in the same way as AML KYC throughout the life cycle of a relationship. | SDD is also applied in the same way as AML KYC throughout the life cycle of a relationship. |
| 2919663dde18-a580-42a5-8c2b-c05f33899a9a | Not Translated (0%) | In other words, SDD is applied: | In other words, SDD is applied: |
| 2920c4e88e0d-2afa-491c-bad4-fcb340467016 | Not Translated (0%) | At the start of a relationship (i.e., onboarding) | At the start of a relationship (i.e., onboarding) |
| 2921c4e4f317-3999-4bd6-b2b1-b0e583765c6b | Not Translated (0%) | Upon the introduction of a new product | Upon the introduction of a new product |
| 29228a3164e6-a877-40bc-ab69-8aab8e00ff19 | Not Translated (0%) | In response to trigger events during a relationship, such as a target match generated by a screening tool | In response to trigger events during a relationship, such as a target match generated by a screening tool |
| 292373de464d-2a6a-4d39-bb6d-7ab25aae0c32 | Not Translated (0%) | During periodic reviews | During periodic reviews |
| 29242183848c-dabe-4b34-a460-d7124cb17e22 | Not Translated (0%) | When a relationship comes to an end | When a relationship comes to an end |
| 2925f41856cb-d8df-4116-a94e-5248270cfe47 | Not Translated (0%) | Given the frequently changing nature of sanctions, it is imperative that institutions keep up-to-date SDD data with which to effectively mitigate sanctions risks. | Given the frequently changing nature of sanctions, it is imperative that institutions keep up-to-date SDD data with which to effectively mitigate sanctions risks. |
| 2926f41856cb-d8df-4116-a94e-5248270cfe47 | Not Translated (0%) | Full sanctions are relatively straightforward to implement. | Full sanctions are relatively straightforward to implement. |
| 2927f41856cb-d8df-4116-a94e-5248270cfe47 | Not Translated (0%) | However, sanctions become more complicated with gradual easing. | However, sanctions become more complicated with gradual easing. |
| 2928f41856cb-d8df-4116-a94e-5248270cfe47 | Not Translated (0%) | For example, the gradual easing of European economic and financial sanctions imposed on Iran requires that European businesses assess the extent to which they or one of their counterparties might have some involvement in permitted activities. | For example, the gradual easing of European economic and financial sanctions imposed on Iran requires that European businesses assess the extent to which they or one of their counterparties might have some involvement in permitted activities. |
| 2929f41856cb-d8df-4116-a94e-5248270cfe47 | Not Translated (0%) | The same situation applies to targeted sanctions against Russian entities and individuals, in which case the specific nature of the transactions must be assessed in order to determine whether the transactions are permitted. | The same situation applies to targeted sanctions against Russian entities and individuals, in which case the specific nature of the transactions must be assessed in order to determine whether the transactions are permitted. |
| 29309133015b-99c7-488d-8564-4a2e32a70ff8 | Not Translated (0%) | In some cases, US individuals and entities are subject to primary US sanctions and are thus prohibited from engaging in transactions and dealings with a country and its government. | In some cases, US individuals and entities are subject to primary US sanctions and are thus prohibited from engaging in transactions and dealings with a country and its government. |
| 29319133015b-99c7-488d-8564-4a2e32a70ff8 | Not Translated (0%) | However, case-by-case licensing applications are possible for certain transactions. | However, case-by-case licensing applications are possible for certain transactions. |
| 29329133015b-99c7-488d-8564-4a2e32a70ff8 | Not Translated (0%) | Secondary sanctions apply to non–US persons who are involved in transactions with individuals and entities in other countries. | Secondary sanctions apply to non–US persons who are involved in transactions with individuals and entities in other countries. |
| 293362c7dec6-406a-44a4-8c4f-01122806e6b5 | Not Translated (0%) | The continued restrictions on US persons requires that financial institutions conduct thorough due diligence to ensure that the services and products they provide do not violate these restrictions, especially where several different parties or entities may be involved. | The continued restrictions on US persons requires that financial institutions conduct thorough due diligence to ensure that the services and products they provide do not violate these restrictions, especially where several different parties or entities may be involved. |
| 29347903b4ca-5ab0-4076-b629-8372ef6b1720 | Not Translated (0%) | Sometimes there is a conflict between laws, in which case the entity must decide which laws to follow when they compete for compliance. | Sometimes there is a conflict between laws, in which case the entity must decide which laws to follow when they compete for compliance. |
| 29357903b4ca-5ab0-4076-b629-8372ef6b1720 | Not Translated (0%) | This is particularly relevant in the case of Iran following the United States “snap-back” in early 2019, at which point the EU’s Iran sanctions regime significantly deviated from that of the United States. | This is particularly relevant in the case of Iran following the United States “snap-back” in early 2019, at which point the EU’s Iran sanctions regime significantly deviated from that of the United States. |
| 29367903b4ca-5ab0-4076-b629-8372ef6b1720 | Not Translated (0%) | If a US nexus exists, the Office of Foreign Assets Control (OFAC) regulations apply. | If a US nexus exists, the Office of Foreign Assets Control (OFAC) regulations apply. |
| 29371a39953e-3bd4-4f0e-9704-ab0051ae06cc | Not Translated (0%) | Ongoing monitoring measures are necessary to ensure that transactions are screened in real time (i.e., ex ante) and payments are checked to ensure that ongoing restrictions related to any relevant sanctions regime are not being violated. | Ongoing monitoring measures are necessary to ensure that transactions are screened in real time (i.e., ex ante) and payments are checked to ensure that ongoing restrictions related to any relevant sanctions regime are not being violated. |
| 2938c3d2d1fe-87fc-4118-8ef1-c7f8f7f5efd3 | Not Translated (0%) | Governance | Governance |
| 2939432ffe95-6042-4e44-a1ec-b5f1735020b2 | Not Translated (0%) | Sanctions due diligence is driven by sanctions regimes and governance. | Sanctions due diligence is driven by sanctions regimes and governance. |
| 2940432ffe95-6042-4e44-a1ec-b5f1735020b2 | Not Translated (0%) | Sanctions regimes are both far-reaching and very targeted, which can complicate the SDD measures that are necessary to meet sanctions requirements. | Sanctions regimes are both far-reaching and very targeted, which can complicate the SDD measures that are necessary to meet sanctions requirements. |
| 2941432ffe95-6042-4e44-a1ec-b5f1735020b2 | Not Translated (0%) | This situation often requires institutions to conduct in-depth investigations in order to manage the risks. | This situation often requires institutions to conduct in-depth investigations in order to manage the risks. |
| 2942afc7e5e0-9666-446a-9a0f-a729a8240817 | Not Translated (0%) | “Enhanced Due Diligence in Managing Sanctions Risks,” ACAMS Today, March 7, 2016. | “Enhanced Due Diligence in Managing Sanctions Risks,” ACAMS Today, March 7, 2016. |
| 29438d8e3b32-8e08-4832-87c0-545a56ad2077 | Not Translated (0%) | The greatest risk in relation to sanctions breaches is the use of intermediaries and other means to hide the ultimate customer or user of a product. | The greatest risk in relation to sanctions breaches is the use of intermediaries and other means to hide the ultimate customer or user of a product. |
| 29448d8e3b32-8e08-4832-87c0-545a56ad2077 | Not Translated (0%) | Thus, transactions in which there is a transfer of ownership and more than one party involved can be used to disguise the true reason behind a transaction. | Thus, transactions in which there is a transfer of ownership and more than one party involved can be used to disguise the true reason behind a transaction. |
| 29458d8e3b32-8e08-4832-87c0-545a56ad2077 | Not Translated (0%) | Trade finance transactions are well-suited to these types of activities. | Trade finance transactions are well-suited to these types of activities. |
| 29468a9dfe3c-4445-4eb9-903e-eaab62c948e8 | Not Translated (0%) | Due to the targeted nature of the sanctions and the risks of links to terrorist financing, it is important to have in place solid governance frameworks for business activities in or related to sanctioned countries and terrorist financing networks. | Due to the targeted nature of the sanctions and the risks of links to terrorist financing, it is important to have in place solid governance frameworks for business activities in or related to sanctioned countries and terrorist financing networks. |
| 29478a9dfe3c-4445-4eb9-903e-eaab62c948e8 | Not Translated (0%) | Organizations should therefore develop appropriate risk assessment tools with which to identify high-risk customers and then subsequently undertake enhanced due diligence (EDD) to identify the direct and, more importantly, the indirect links to sanctioned entities and individuals. | Organizations should therefore develop appropriate risk assessment tools with which to identify high-risk customers and then subsequently undertake enhanced due diligence (EDD) to identify the direct and, more importantly, the indirect links to sanctioned entities and individuals. |
| 29488a9dfe3c-4445-4eb9-903e-eaab62c948e8 | Not Translated (0%) | Finally, based on the results of a risk assessment, risk mitigation measures and monitoring procedures should be implemented to manage and minimize sanctions risk exposure. | Finally, based on the results of a risk assessment, risk mitigation measures and monitoring procedures should be implemented to manage and minimize sanctions risk exposure. |
| 2949c7154746-9ad0-4483-87e6-8b3821c4d69b | Not Translated (0%) | Within a financial institution, the governance structure that supports a sanctions compliance program is generally comprised of two components: | Within a financial institution, the governance structure that supports a sanctions compliance program is generally comprised of two components: |
| 2950c7154746-9ad0-4483-87e6-8b3821c4d69b | Not Translated (0%) | (1) the board of directors (or equivalent oversight body), including senior management, and (2) the “three lines of defense.” | (1) the board of directors (or equivalent oversight body), including senior management, and (2) the “three lines of defense.” |
| 2951a0deddb7-bb5d-456d-a053-8b8513aa2dc4 | Not Translated (0%) | The board of directors is responsible for approving the sanctions compliance program and providing oversight of the program. | The board of directors is responsible for approving the sanctions compliance program and providing oversight of the program. |
| 2952a0deddb7-bb5d-456d-a053-8b8513aa2dc4 | Not Translated (0%) | The board will often sign off on the organization’s sanctions risk assessment. | The board will often sign off on the organization’s sanctions risk assessment. |
| 2953a0deddb7-bb5d-456d-a053-8b8513aa2dc4 | Not Translated (0%) | In addition, the board is responsible for establishing the “risk appetite” of the business and ensuring that the program is sufficiently resourced based on the results of the risk assessment. | In addition, the board is responsible for establishing the “risk appetite” of the business and ensuring that the program is sufficiently resourced based on the results of the risk assessment. |
| 2954a543ca50-c702-4db7-8851-ab1d6b349dba | Not Translated (0%) | There are three lines of defense within the governance structure of a sanctions compliance program (<6685/>): the business line, sanctions compliance, and internal audit. | There are three lines of defense within the governance structure of a sanctions compliance program (<6685/>): the business line, sanctions compliance, and internal audit. |
| 29552ebb5869-6373-4921-a4b7-b24acc5e6976 | Not Translated (0%) | The first line of defense is the business line, also referred to as the “front line.” | The first line of defense is the business line, also referred to as the “front line.” |
| 29562ebb5869-6373-4921-a4b7-b24acc5e6976 | Not Translated (0%) | The first-line defense includes relationship managers and other customer-facing employees. | The first-line defense includes relationship managers and other customer-facing employees. |
| 29572ebb5869-6373-4921-a4b7-b24acc5e6976 | Not Translated (0%) | These individuals are closest to the customers and counterparties during the onboarding and contracting phase of relationships. | These individuals are closest to the customers and counterparties during the onboarding and contracting phase of relationships. |
| 29582ebb5869-6373-4921-a4b7-b24acc5e6976 | Not Translated (0%) | They are the first to identify unusual activity in relation to a customer’s business or behavior. | They are the first to identify unusual activity in relation to a customer’s business or behavior. |
| 29592ebb5869-6373-4921-a4b7-b24acc5e6976 | Not Translated (0%) | The first-line defense is responsible for ensuring that adequate information is obtained so that effective screening of customers and their owners and controllers can be performed. | The first-line defense is responsible for ensuring that adequate information is obtained so that effective screening of customers and their owners and controllers can be performed. |
| 29602ebb5869-6373-4921-a4b7-b24acc5e6976 | Not Translated (0%) | In general, the first-line defense owns and manages the collection of SDD information. | In general, the first-line defense owns and manages the collection of SDD information. |
| 2961bb078ca9-09e6-4a15-be48-b0e3bd8c97e0 | Not Translated (0%) | Three Lines of Defense | Three Lines of Defense |
| 2962ff710120-486b-46be-b8d5-6f3c7a64e64c | Not Translated (0%) | Effective employee training is a key component of a solid front-line defense. | Effective employee training is a key component of a solid front-line defense. |
| 2963ff710120-486b-46be-b8d5-6f3c7a64e64c | Not Translated (0%) | The institution must establish processes for screening employees to ensure high ethical and professional standards, and it must deliver appropriate training on SDD policies and procedures based on roles and functions performed so employees are keenly aware of their responsibilities. | The institution must establish processes for screening employees to ensure high ethical and professional standards, and it must deliver appropriate training on SDD policies and procedures based on roles and functions performed so employees are keenly aware of their responsibilities. |
| 2964ff710120-486b-46be-b8d5-6f3c7a64e64c | Not Translated (0%) | To facilitate this, employees should be trained as soon as possible after being hired, with refresher training as appropriate. | To facilitate this, employees should be trained as soon as possible after being hired, with refresher training as appropriate. |
| 2965a4c0670f-8549-4075-8541-dd584ccfa901 | Not Translated (0%) | The sanctions compliance function, as well as the larger compliance function, and the human resources and technology departments comprise the second line of defense. | The sanctions compliance function, as well as the larger compliance function, and the human resources and technology departments comprise the second line of defense. |
| 2966a4c0670f-8549-4075-8541-dd584ccfa901 | Not Translated (0%) | In all cases, the sanctions compliance officer (SCO) is responsible for ongoing monitoring for sanctions compliance, including sample testing and a review of exception reports, to enable the escalation of identified noncompliance or other issues to senior management and, where appropriate, the board. | In all cases, the sanctions compliance officer (SCO) is responsible for ongoing monitoring for sanctions compliance, including sample testing and a review of exception reports, to enable the escalation of identified noncompliance or other issues to senior management and, where appropriate, the board. |
| 2967a4c0670f-8549-4075-8541-dd584ccfa901 | Not Translated (0%) | The sanctions compliance officer should be the contact point for all sanctions-related issues for internal and external authorities and should have the responsibility for reporting suspicious transactions. | The sanctions compliance officer should be the contact point for all sanctions-related issues for internal and external authorities and should have the responsibility for reporting suspicious transactions. |
| 2968a4c0670f-8549-4075-8541-dd584ccfa901 | Not Translated (0%) | To enable the successful oversight of the sanctions compliance program, the sanctions compliance officer must have sufficient independence from the business lines to prevent conflicts of interest and to facilitate unbiased advice and counsel. | To enable the successful oversight of the sanctions compliance program, the sanctions compliance officer must have sufficient independence from the business lines to prevent conflicts of interest and to facilitate unbiased advice and counsel. |
| 2969a4c0670f-8549-4075-8541-dd584ccfa901 | Not Translated (0%) | The compliance officer should not be entrusted with the responsibilities of data protection or internal audit. | The compliance officer should not be entrusted with the responsibilities of data protection or internal audit. |
| 2970f75d8d49-548e-4ebb-badc-831fa94414f3 | Not Translated (0%) | In general, the second line exists to ensure that SDD procedures and processes applied by the first line are designed properly, established firmly, and applied as intended. | In general, the second line exists to ensure that SDD procedures and processes applied by the first line are designed properly, established firmly, and applied as intended. |
| 2971f75d8d49-548e-4ebb-badc-831fa94414f3 | Not Translated (0%) | Individuals supporting the second line of defense should review the effectiveness of controls used to mitigate sanctions risks, provide information to the first line, and, depending on the business, investigate possible noncompliance with sanctions restrictions. | Individuals supporting the second line of defense should review the effectiveness of controls used to mitigate sanctions risks, provide information to the first line, and, depending on the business, investigate possible noncompliance with sanctions restrictions. |
| 2972f75d8d49-548e-4ebb-badc-831fa94414f3 | Not Translated (0%) | If necessary, they submit reports to the relevant authorities. | If necessary, they submit reports to the relevant authorities. |
| 2973ff0fd901-e34e-4e8c-82bc-0712e48d4453 | Not Translated (0%) | Within the second-line defense function, there is typically a subject-matter expert who is also a manager. | Within the second-line defense function, there is typically a subject-matter expert who is also a manager. |
| 2974ff0fd901-e34e-4e8c-82bc-0712e48d4453 | Not Translated (0%) | This individual may or may not be the Money Laundering Reporting Officer (MLRO). | This individual may or may not be the Money Laundering Reporting Officer (MLRO). |
| 29757a2df135-b683-4fc8-8b27-f366b4cc89c8 | Not Translated (0%) | Embedded within the various lines of defense, sanctions programs should have dual controls in place. | Embedded within the various lines of defense, sanctions programs should have dual controls in place. |
| 29767a2df135-b683-4fc8-8b27-f366b4cc89c8 | Not Translated (0%) | Dual control is a principle whereby at least two employees are required in order to complete an internal control task. | Dual control is a principle whereby at least two employees are required in order to complete an internal control task. |
| 29777a2df135-b683-4fc8-8b27-f366b4cc89c8 | Not Translated (0%) | The purpose of dual control is to protect against internal fraud and prevent internal control failure at a single point. | The purpose of dual control is to protect against internal fraud and prevent internal control failure at a single point. |
| 29787a2df135-b683-4fc8-8b27-f366b4cc89c8 | Not Translated (0%) | In some circumstances, this is referred to as “maker-checker” or “four-eyes.” | In some circumstances, this is referred to as “maker-checker” or “four-eyes.” |
| 2979c2ddde12-bbcd-48e4-a104-dc644540e215 | Not Translated (0%) | The dual-control process varies based on institution size; it can reside solely within the second-line defense or involve the first line, including the operations department. | The dual-control process varies based on institution size; it can reside solely within the second-line defense or involve the first line, including the operations department. |
| 2980c2ddde12-bbcd-48e4-a104-dc644540e215 | Not Translated (0%) | The escalation paths and related dual-control functions depend on the size and complexity of both the institution and the business profile. | The escalation paths and related dual-control functions depend on the size and complexity of both the institution and the business profile. |
| 298199311302-4709-4099-931b-6f2e7e2ee5fb | Not Translated (0%) | The third line of defense is internal audit (the same as the testing and auditing step, per the OFAC guidance), which involves independent reviews of the controls applied by the first two lines of defense. | The third line of defense is internal audit (the same as the testing and auditing step, per the OFAC guidance), which involves independent reviews of the controls applied by the first two lines of defense. |
| 298299311302-4709-4099-931b-6f2e7e2ee5fb | Not Translated (0%) | Individuals who conduct the internal audit should report to the audit committee of the board of directors (or a similar oversight body) and independently evaluate the risk management and controls of the bank through periodic assessments. | Individuals who conduct the internal audit should report to the audit committee of the board of directors (or a similar oversight body) and independently evaluate the risk management and controls of the bank through periodic assessments. |
| 298399311302-4709-4099-931b-6f2e7e2ee5fb | Not Translated (0%) | Specific aspects of the audit include assessment of the following: the adequacy of the bank’s controls to mitigate the identified risks, the effectiveness of the staff’s execution of the controls, the effectiveness of the compliance oversight and quality controls, and the effectiveness of training. | Specific aspects of the audit include assessment of the following: the adequacy of the bank’s controls to mitigate the identified risks, the effectiveness of the staff’s execution of the controls, the effectiveness of the compliance oversight and quality controls, and the effectiveness of training. |
| 298499311302-4709-4099-931b-6f2e7e2ee5fb | Not Translated (0%) | The audit function relies on knowledgeable employees with sufficient audit expertise and comprehensive training on sanctions risks, how they arise, and the types of controls used to mitigate risks. | The audit function relies on knowledgeable employees with sufficient audit expertise and comprehensive training on sanctions risks, how they arise, and the types of controls used to mitigate risks. |
| 298599311302-4709-4099-931b-6f2e7e2ee5fb | Not Translated (0%) | Audits should be conducted on a risk-based frequency, and a bank-wide audit should be conducted periodically. | Audits should be conducted on a risk-based frequency, and a bank-wide audit should be conducted periodically. |
| 298699311302-4709-4099-931b-6f2e7e2ee5fb | Not Translated (0%) | Audits need to be properly scoped to evaluate the effectiveness of the program, including where external auditors are used. | Audits need to be properly scoped to evaluate the effectiveness of the program, including where external auditors are used. |
| 298799311302-4709-4099-931b-6f2e7e2ee5fb | Not Translated (0%) | Auditors should proactively follow up on their findings and recommendations. | Auditors should proactively follow up on their findings and recommendations. |
| 2988c31d60bf-8750-42d6-9b05-426f9bdf0ca0 | Not Translated (0%) | Know Your Customer | Know Your Customer |
| 298927a9c538-5d65-469f-acfe-16b5f94504c3 | Not Translated (0%) | Customers are the core of business—whether in the public or the private sector. | Customers are the core of business—whether in the public or the private sector. |
| 299027a9c538-5d65-469f-acfe-16b5f94504c3 | Not Translated (0%) | Yet customers also present a risk to an institution with regard to sanctions compliance. | Yet customers also present a risk to an institution with regard to sanctions compliance. |
| 299127a9c538-5d65-469f-acfe-16b5f94504c3 | Not Translated (0%) | For this reason, knowing and understanding the customer is critical in sanctions compliance programs, including identifying and verifying a customer’s identity and understanding the nature and purpose of the customer’s business. | For this reason, knowing and understanding the customer is critical in sanctions compliance programs, including identifying and verifying a customer’s identity and understanding the nature and purpose of the customer’s business. |
| 299227a9c538-5d65-469f-acfe-16b5f94504c3 | Not Translated (0%) | In fact, the more an institution knows about its customers, the better it can mitigate the risk of noncompliance. | In fact, the more an institution knows about its customers, the better it can mitigate the risk of noncompliance. |
| 299327a9c538-5d65-469f-acfe-16b5f94504c3 | Not Translated (0%) | Note that “customer” as used herein also refers to related parties, which may include suppliers to a business, executive management, and beneficial owners. | Note that “customer” as used herein also refers to related parties, which may include suppliers to a business, executive management, and beneficial owners. |
| 2994b0b2bb63-b524-4cf4-8425-93cf4968530c | Not Translated (0%) | Comprehensive policies, procedures, and processes for all customers comprise a sound KYC program that works to prevent financial crimes and ensure compliance with global sanctions. | Comprehensive policies, procedures, and processes for all customers comprise a sound KYC program that works to prevent financial crimes and ensure compliance with global sanctions. |
| 2995b0b2bb63-b524-4cf4-8425-93cf4968530c | Not Translated (0%) | In fact, KYC is Recommendation 10 in the Financial Action Task Force (FATF) Recommendations of February 2012 and updated in 2018. | In fact, KYC is Recommendation 10 in the Financial Action Task Force (FATF) Recommendations of February 2012 and updated in 2018. |
| 2996b0b2bb63-b524-4cf4-8425-93cf4968530c | Not Translated (0%) | FATF recommends that institutions incorporate the following measures into their KYC programs: | FATF recommends that institutions incorporate the following measures into their KYC programs: |
| 299778805aa9-fb78-41d0-b983-2e9a1358a63a | Not Translated (0%) | Identifying the customer and verifying the customer’s identity using reliable independent source documents, data, or information | Identifying the customer and verifying the customer’s identity using reliable independent source documents, data, or information |
| 29980ea0ae75-1d64-4eec-999c-81af4a58d28c | Not Translated (0%) | Identifying the beneficial owners and taking reasonable measures to verify the identity of the beneficial owners | Identifying the beneficial owners and taking reasonable measures to verify the identity of the beneficial owners |
| 2999eb9ee42a-4204-42b6-980f-eaf1c7bcb978 | Not Translated (0%) | Understanding and, as appropriate, obtaining information on the purpose and intended nature of the business relationship | Understanding and, as appropriate, obtaining information on the purpose and intended nature of the business relationship |
| 300071a5a4e7-ead2-416c-a3c2-f204c2014a8f | Not Translated (0%) | Conducting ongoing due diligence on the business relationship and scrutinizing transactions undertaken throughout the course of the relationship to ensure that the transactions being conducted are consistent with the institution’s knowledge of the customer, their business, their risk profile, and, where necessary, the source of their funds | Conducting ongoing due diligence on the business relationship and scrutinizing transactions undertaken throughout the course of the relationship to ensure that the transactions being conducted are consistent with the institution’s knowledge of the customer, their business, their risk profile, and, where necessary, the source of their funds |
| 3001c07f226a-5e6d-41ca-adb8-32d559fe2d6a | Not Translated (0%) | Although not all elements of a complete KYC program are directly relevant to a sanctions program (e.g., customer risk rating), a sanctions program should encompass the following basic elements, tailored to the firm’s business profile: | Although not all elements of a complete KYC program are directly relevant to a sanctions program (e.g., customer risk rating), a sanctions program should encompass the following basic elements, tailored to the firm’s business profile: |
| 3002df3a3b27-7741-4f68-a5b8-71ba61896537 | Not Translated (0%) | Knowing and verifying the identity of a customer and any counterparties | Knowing and verifying the identity of a customer and any counterparties |
| 30033ead6e48-ba01-44d7-aa57-78f951aca9ff | Not Translated (0%) | Knowing and verifying the beneficial owners | Knowing and verifying the beneficial owners |
| 3004302cdc5c-b025-422d-8b60-efb1e6049b0d | Not Translated (0%) | Understanding the nature and purpose of the customer’s account or transactions, including: | Understanding the nature and purpose of the customer’s account or transactions, including: |
| 30054ec965b4-414b-491c-9ed5-38e15a74aa9d | Not Translated (0%) | The underlying business activity of the customer, what goods and services it trades in, and why it is seeking funding or other services | The underlying business activity of the customer, what goods and services it trades in, and why it is seeking funding or other services |
| 30062f44d132-26ec-4eb8-b082-fd44c35effab | Not Translated (0%) | Where the customer is located and, if different, its principal place of business | Where the customer is located and, if different, its principal place of business |
| 300773e33303-fbb6-4519-9123-83caa092a63b | Not Translated (0%) | Where the customer intends to send funds or receive funds from | Where the customer intends to send funds or receive funds from |
| 300840053c78-29bf-40bc-964d-f370ea61151f | Not Translated (0%) | The source of funds and the source of wealth | The source of funds and the source of wealth |
| 30098c2c495a-8ae4-40f9-ae40-458f4845a93d | Not Translated (0%) | For sanctions purposes, the scope of SDD can be more limited (although it is never appropriate to neglect AML responsibilities) and depends on the business profile. | For sanctions purposes, the scope of SDD can be more limited (although it is never appropriate to neglect AML responsibilities) and depends on the business profile. |
| 30108c2c495a-8ae4-40f9-ae40-458f4845a93d | Not Translated (0%) | Some of the basic elements of SDD will be obvious, such as when the customer is a publicly traded company on a well-regulated stock exchange that requires voluminous disclosures, or when the customer is a small, local retail business within the community. | Some of the basic elements of SDD will be obvious, such as when the customer is a publicly traded company on a well-regulated stock exchange that requires voluminous disclosures, or when the customer is a small, local retail business within the community. |
| 30118c2c495a-8ae4-40f9-ae40-458f4845a93d | Not Translated (0%) | The difficulty is in finding the middle ground. | The difficulty is in finding the middle ground. |
| 30128c2c495a-8ae4-40f9-ae40-458f4845a93d | Not Translated (0%) | The core element of SDD is an understanding of the sanctions exposure that emanates from the customer and its business. | The core element of SDD is an understanding of the sanctions exposure that emanates from the customer and its business. |
| 3013b049e5af-f5ce-4360-804a-38784520892d | Not Translated (0%) | Contrasted with AML requirements, sanctions information can be focused, for example, when considering geographic risk exposure. | Contrasted with AML requirements, sanctions information can be focused, for example, when considering geographic risk exposure. |
| 3014b049e5af-f5ce-4360-804a-38784520892d | Not Translated (0%) | For AML purposes, understanding a customer’s exposure to high-risk countries may be appropriate. | For AML purposes, understanding a customer’s exposure to high-risk countries may be appropriate. |
| 3015b049e5af-f5ce-4360-804a-38784520892d | Not Translated (0%) | However, for sanctions purposes, this understanding may be narrowed to identifying a customer’s risk exposure to those sanctioned countries, which represent a smaller list. | However, for sanctions purposes, this understanding may be narrowed to identifying a customer’s risk exposure to those sanctioned countries, which represent a smaller list. |
| 30162ed10377-733c-4695-a596-5d58b462d79a | Not Translated (0%) | Because sanctions risks can also linger in complex supply chain structures, it is important to determine how the customer’s supply chain can be exposed to sanctions risk, even indirectly, in addition to understanding the geographic risk exposure. | Because sanctions risks can also linger in complex supply chain structures, it is important to determine how the customer’s supply chain can be exposed to sanctions risk, even indirectly, in addition to understanding the geographic risk exposure. |
| 30172ed10377-733c-4695-a596-5d58b462d79a | Not Translated (0%) | This fact highlights the importance of also knowing third parties. | This fact highlights the importance of also knowing third parties. |
| 30184d3b9de0-2894-485c-9387-6b1172f33e31 | Not Translated (0%) | An effective SDD process is essential for mitigating risk. | An effective SDD process is essential for mitigating risk. |
| 30194d3b9de0-2894-485c-9387-6b1172f33e31 | Not Translated (0%) | SDD includes establishing the customer’s identity, beneficial ownership, controlling influences, and sanctions risk exposure. | SDD includes establishing the customer’s identity, beneficial ownership, controlling influences, and sanctions risk exposure. |
| 30204d3b9de0-2894-485c-9387-6b1172f33e31 | Not Translated (0%) | That process begins with collecting key information on customers. | That process begins with collecting key information on customers. |
| 3021473f4fbc-01e4-40b9-87ff-493c42bff065 | Not Translated (0%) | KEY INFORMATION TO COLLECT | KEY INFORMATION TO COLLECT |
| 30226e8e3e58-8b4a-4bd3-8f24-083a52ef878d | Not Translated (0%) | As with AML programs, because customers present various degrees of risk, SDD programs need to incorporate different levels of due diligence for collecting information on customers. | As with AML programs, because customers present various degrees of risk, SDD programs need to incorporate different levels of due diligence for collecting information on customers. |
| 30236e8e3e58-8b4a-4bd3-8f24-083a52ef878d | Not Translated (0%) | Knowledge about a customer will drive the determination of where a customer falls in that risk spectrum, and a standard process will outline the specific SDD methods. | Knowledge about a customer will drive the determination of where a customer falls in that risk spectrum, and a standard process will outline the specific SDD methods. |
| 3024cb129bfa-0f11-4ece-b896-83e4ee5b10cf | Not Translated (0%) | A customer can pose a sanctions compliance risk for an organization via its supply chain, affiliates, counterparties, products and services, and even from the nature of its business. | A customer can pose a sanctions compliance risk for an organization via its supply chain, affiliates, counterparties, products and services, and even from the nature of its business. |
| 3025cb129bfa-0f11-4ece-b896-83e4ee5b10cf | Not Translated (0%) | Undertaking SDD at onboarding is critical to identify potential sanctions risks and to identify customers who might later become sanctions targets. | Undertaking SDD at onboarding is critical to identify potential sanctions risks and to identify customers who might later become sanctions targets. |
| 30263b13b562-226e-4252-8ad4-d7c4e731a583 | Not Translated (0%) | Key information to collect about customers includes: | Key information to collect about customers includes: |
| 30271df359fb-e433-448e-abc1-cc5f9b7dcf83 | Not Translated (0%) | The customer: | The customer: |
| 30281df359fb-e433-448e-abc1-cc5f9b7dcf83 | Not Translated (0%) | Who is the customer? | Who is the customer? |
| 30291df359fb-e433-448e-abc1-cc5f9b7dcf83 | Not Translated (0%) | If it is a legal entity, who owns and controls it, and who are the beneficial owners and intermediate owners (i.e., those legal intermediary owners that are not natural persons), if appropriate? | If it is a legal entity, who owns and controls it, and who are the beneficial owners and intermediate owners (i.e., those legal intermediary owners that are not natural persons), if appropriate? |
| 30301df359fb-e433-448e-abc1-cc5f9b7dcf83 | Not Translated (0%) | What assets do they hold, directly or indirectly? | What assets do they hold, directly or indirectly? |
| 3031a53bc4e0-b039-4ca4-96ee-7e59c32517f3 | Not Translated (0%) | The nature of the business: | The nature of the business: |
| 3032a53bc4e0-b039-4ca4-96ee-7e59c32517f3 | Not Translated (0%) | What goods/products and services do they use? | What goods/products and services do they use? |
| 3033a53bc4e0-b039-4ca4-96ee-7e59c32517f3 | Not Translated (0%) | What activities do they engage in? | What activities do they engage in? |
| 3034a53bc4e0-b039-4ca4-96ee-7e59c32517f3 | Not Translated (0%) | Could the goods or services have a military purpose? | Could the goods or services have a military purpose? |
| 303585852f06-c5cf-4164-9141-7f30d4667ebb | Not Translated (0%) | The jurisdiction or geographical connections: | The jurisdiction or geographical connections: |
| 303685852f06-c5cf-4164-9141-7f30d4667ebb | Not Translated (0%) | In what jurisdictions do the parties operate? | In what jurisdictions do the parties operate? |
| 303785852f06-c5cf-4164-9141-7f30d4667ebb | Not Translated (0%) | With which jurisdictions do they intend to interact (involving your institution as opposed to its overall operations)? | With which jurisdictions do they intend to interact (involving your institution as opposed to its overall operations)? |
| 3038048f6874-5251-4bff-8b63-0e93600069e7 | Not Translated (0%) | MAINTAINING UP-TO-DATE INFORMATION | MAINTAINING UP-TO-DATE INFORMATION |
| 30393a5f8a18-9325-47f3-a801-73895f6f88dc | Not Translated (0%) | After the onboarding stage, it is extremely important to maintain up-to-date SDD about the customer, its controllers and beneficial owners, and any assets held, directly or indirectly. | After the onboarding stage, it is extremely important to maintain up-to-date SDD about the customer, its controllers and beneficial owners, and any assets held, directly or indirectly. |
| 30403a5f8a18-9325-47f3-a801-73895f6f88dc | Not Translated (0%) | Up-to-date SDD will help in the efficient and effective identification of new and existing customers named as sanctions targets and their assets. | Up-to-date SDD will help in the efficient and effective identification of new and existing customers named as sanctions targets and their assets. |
| 30413a5f8a18-9325-47f3-a801-73895f6f88dc | Not Translated (0%) | Industry practices include having periodic reviews and event-trigger reviews on the customer to determine whether the information collected and verified at onboarding remains relevant to the current information and the transactional activity observed. | Industry practices include having periodic reviews and event-trigger reviews on the customer to determine whether the information collected and verified at onboarding remains relevant to the current information and the transactional activity observed. |
| 30427053702f-bd08-46d1-8307-f0c25e133511 | Not Translated (0%) | Know the Ultimate Beneficial Owner | Know the Ultimate Beneficial Owner |
| 30435877a255-119d-453a-9288-cc846125e799 | Not Translated (0%) | In addition to knowing the customer, an essential component of sanctions due diligence is complete knowledge about legal entities and their ownership as part of a larger corporate structure—that is, to know any beneficial owners of the customer. | In addition to knowing the customer, an essential component of sanctions due diligence is complete knowledge about legal entities and their ownership as part of a larger corporate structure—that is, to know any beneficial owners of the customer. |
| 30445877a255-119d-453a-9288-cc846125e799 | Not Translated (0%) | Financial institutions must look beyond named account holders to the beneficiaries of transactions and the beneficial owners of the entities involved. | Financial institutions must look beyond named account holders to the beneficiaries of transactions and the beneficial owners of the entities involved. |
| 3045a8e78a9d-8baa-4596-9f46-de0c83c4f0cb | Not Translated (0%) | The concept of beneficial ownership, also referred to as ultimate beneficial ownership (UBO), is distinguished from legal or intermediary ownership. | The concept of beneficial ownership, also referred to as ultimate beneficial ownership (UBO), is distinguished from legal or intermediary ownership. |
| 3046a8e78a9d-8baa-4596-9f46-de0c83c4f0cb | Not Translated (0%) | According to FATF and the US Financial Crimes Enforcement Network (FinCEN), beneficial owner refers to the natural person(s) who ultimately owns or controls a customer and/or the natural person on whose behalf a transaction is being conducted. | According to FATF and the US Financial Crimes Enforcement Network (FinCEN), beneficial owner refers to the natural person(s) who ultimately owns or controls a customer and/or the natural person on whose behalf a transaction is being conducted. |
| 3047a8e78a9d-8baa-4596-9f46-de0c83c4f0cb | Not Translated (0%) | It also includes natural person(s) who exercise effective control over a legal person or arrangement. | It also includes natural person(s) who exercise effective control over a legal person or arrangement. |
| 3048a8e78a9d-8baa-4596-9f46-de0c83c4f0cb | Not Translated (0%) | The phrases “ultimately owns or controls” and “ultimate effective control” refer to situations in which ownership or control is exercised through a chain of ownership or by means of control other than direct control. | The phrases “ultimately owns or controls” and “ultimate effective control” refer to situations in which ownership or control is exercised through a chain of ownership or by means of control other than direct control. |
| 3049a8e78a9d-8baa-4596-9f46-de0c83c4f0cb | Not Translated (0%) | This definition should also apply to the beneficial owner of a beneficiary under a life or other investment-linked insurance policy. | This definition should also apply to the beneficial owner of a beneficiary under a life or other investment-linked insurance policy. |
| 30504343a8aa-4b0a-43d7-8220-81d78fe95418 | Not Translated (0%) | The term “beneficial ownership,” when used to refer to the beneficial ownership of an account, is conventionally understood to equate to ultimate control over funds in such account, whether through ownership or other means. | The term “beneficial ownership,” when used to refer to the beneficial ownership of an account, is conventionally understood to equate to ultimate control over funds in such account, whether through ownership or other means. |
| 30514343a8aa-4b0a-43d7-8220-81d78fe95418 | Not Translated (0%) | “Control” in this sense is distinguished from mere signature authority or legal title; it reflects the recognition that a person in whose name an account is opened with a bank is not necessarily the person who ultimately controls such funds. | “Control” in this sense is distinguished from mere signature authority or legal title; it reflects the recognition that a person in whose name an account is opened with a bank is not necessarily the person who ultimately controls such funds. |
| 30524343a8aa-4b0a-43d7-8220-81d78fe95418 | Not Translated (0%) | This distinction is important because the focus of AML efforts needs to be on the person who has this ultimate level of control. | This distinction is important because the focus of AML efforts needs to be on the person who has this ultimate level of control. |
| 3053ef3423f2-9b1c-4bf1-80e6-cc14f82bb56f | Not Translated (0%) | The Wolfsberg Group. | The Wolfsberg Group. |
| 3054ef3423f2-9b1c-4bf1-80e6-cc14f82bb56f | Not Translated (0%) | The Wolfsberg AML Principles: | The Wolfsberg AML Principles: |
| 3055ef3423f2-9b1c-4bf1-80e6-cc14f82bb56f | Not Translated (0%) | Frequently Asked Questions with Regard to Beneficial Ownership in the Context of Private Banking. | Frequently Asked Questions with Regard to Beneficial Ownership in the Context of Private Banking. |
| 305622c07391-b872-4be4-916c-0406881b7598 | Not Translated (0%) | Under the EU’s control prong, the EU sets out criteria to determine when a person or entity is controlled by another person. | Under the EU’s control prong, the EU sets out criteria to determine when a person or entity is controlled by another person. |
| 305722c07391-b872-4be4-916c-0406881b7598 | Not Translated (0%) | The criteria include, among other things: | The criteria include, among other things: |
| 3058e15ef7b3-a1e2-47f9-8bcc-f7e371c66444 | Not Translated (0%) | “Having the right or exercising the power to appoint or remove a majority of the members of the administrative, management, or supervisory body of such legal person or entity | “Having the right or exercising the power to appoint or remove a majority of the members of the administrative, management, or supervisory body of such legal person or entity |
| 3059caa6c4c7-6f81-4934-a0ce-23cf85d4fca1 | Not Translated (0%) | Having appointed solely as a result of the exercise of one’s voting rights a majority of the members of the administrative, management, or supervisory bodies of such legal person or entity who have held office during the present and previous financial year | Having appointed solely as a result of the exercise of one’s voting rights a majority of the members of the administrative, management, or supervisory bodies of such legal person or entity who have held office during the present and previous financial year |
| 3060fc72e7cf-bebc-4ca9-a926-92a1da26342a | Not Translated (0%) | Controlling alone, pursuant to an agreement with other shareholders in or members of a legal person or entity, a majority of shareholders’ or members’ voting rights in that legal person or entity” | Controlling alone, pursuant to an agreement with other shareholders in or members of a legal person or entity, a majority of shareholders’ or members’ voting rights in that legal person or entity” |
| 306118d939da-e30a-4a44-89f9-772b0179136b | Not Translated (0%) | Having the power to exercise a dominant influence pursuant to an agreement | Having the power to exercise a dominant influence pursuant to an agreement |
| 3062263455bd-a84a-4030-9109-19d69291fe41 | Not Translated (0%) | Council of the European Union, Update of the EU Best Practices for the Effective Implementation of Restrictive Measures, Brussels, June 24, 2015. | Council of the European Union, Update of the EU Best Practices for the Effective Implementation of Restrictive Measures, Brussels, June 24, 2015. |
| 30634da8984d-8281-4f2b-a904-3e2b951ce6e1 | Not Translated (0%) | Perpetrators of financial crimes can use front companies, shell companies, trusts, and other company structures to hide beneficial ownerships and links to known criminals, as well as disguise the ultimate beneficial ownership of an asset. | Perpetrators of financial crimes can use front companies, shell companies, trusts, and other company structures to hide beneficial ownerships and links to known criminals, as well as disguise the ultimate beneficial ownership of an asset. |
| 30642899e542-58f3-4f45-a287-5c108be332fd | Not Translated (0%) | DETERMINE BENEFICIAL OWNERSHIP | DETERMINE BENEFICIAL OWNERSHIP |
| 30658c5a3847-4555-4873-8af6-04e66b4a7ba7 | Not Translated (0%) | The concept of “ownership” has evolved over time. | The concept of “ownership” has evolved over time. |
| 30668c5a3847-4555-4873-8af6-04e66b4a7ba7 | Not Translated (0%) | Many businesses are so complex that it can be challenging to determine who “owns” or controls them. | Many businesses are so complex that it can be challenging to determine who “owns” or controls them. |
| 30678c5a3847-4555-4873-8af6-04e66b4a7ba7 | Not Translated (0%) | However, regulators across the world have begun instituting measures requiring financial institutions and other covered institutions to collect and verify beneficial ownership, making this task more feasible. | However, regulators across the world have begun instituting measures requiring financial institutions and other covered institutions to collect and verify beneficial ownership, making this task more feasible. |
| 30688c5a3847-4555-4873-8af6-04e66b4a7ba7 | Not Translated (0%) | Jurisdictions have taken two primary approaches to this task. | Jurisdictions have taken two primary approaches to this task. |
| 30698c5a3847-4555-4873-8af6-04e66b4a7ba7 | Not Translated (0%) | The first, as utilized by the UK and Australia, is the maintenance of a centralized repository at the state level in which beneficial ownership is entered. | The first, as utilized by the UK and Australia, is the maintenance of a centralized repository at the state level in which beneficial ownership is entered. |
| 30708c5a3847-4555-4873-8af6-04e66b4a7ba7 | Not Translated (0%) | However, these registries can become outdated and therefore cannot be relied upon completely. | However, these registries can become outdated and therefore cannot be relied upon completely. |
| 30718c5a3847-4555-4873-8af6-04e66b4a7ba7 | Not Translated (0%) | Financial institutions still are obligated to ensure or independently verify that the correct beneficial ownership is collected. | Financial institutions still are obligated to ensure or independently verify that the correct beneficial ownership is collected. |
| 30728c5a3847-4555-4873-8af6-04e66b4a7ba7 | Not Translated (0%) | The second approach, as recently exemplified in the United States, is to require financial institutions to independently collect and verify beneficial ownership information on their own. | The second approach, as recently exemplified in the United States, is to require financial institutions to independently collect and verify beneficial ownership information on their own. |
| 3073ab4173aa-4cbe-48e2-83fc-1cfbcd56d71c | Not Translated (0%) | Performing Beneficial Ownership Due Diligence | Performing Beneficial Ownership Due Diligence |
| 3074901924e3-a7e3-4063-bfc5-9c35cbe96874 | Not Translated (0%) | Provisions requiring the disclosure of beneficial ownership information may include a reliance provision on the information provided by the customer; however, reliance should in all cases be reasonable. | Provisions requiring the disclosure of beneficial ownership information may include a reliance provision on the information provided by the customer; however, reliance should in all cases be reasonable. |
| 3075901924e3-a7e3-4063-bfc5-9c35cbe96874 | Not Translated (0%) | Moreover, financial institutions must establish clear requirements for how this information will be used within their compliance programs, such as subjecting these customers to ongoing screening and factoring the beneficial owners’ geographic location into the sanctions risk assessment. | Moreover, financial institutions must establish clear requirements for how this information will be used within their compliance programs, such as subjecting these customers to ongoing screening and factoring the beneficial owners’ geographic location into the sanctions risk assessment. |
| 30764c7f34f8-74c2-4fcd-a618-5b582b95a181 | Not Translated (0%) | Firms also should trust and verify the identity of beneficial owners using reliable documents, such as government-issued passports. | Firms also should trust and verify the identity of beneficial owners using reliable documents, such as government-issued passports. |
| 30774c7f34f8-74c2-4fcd-a618-5b582b95a181 | Not Translated (0%) | Additional name screening using keyword searches in search engines such as Google also can provide useful information that a third-party vendor automated screening tool (AST) may not have identified, particularly when the beneficial owners are located in developing countries. | Additional name screening using keyword searches in search engines such as Google also can provide useful information that a third-party vendor automated screening tool (AST) may not have identified, particularly when the beneficial owners are located in developing countries. |
| 30784c7f34f8-74c2-4fcd-a618-5b582b95a181 | Not Translated (0%) | For example, searching for beneficial owners using a Chinese search string in the search engine Baidu is a good practice for discovering beneficial owners found in China. | For example, searching for beneficial owners using a Chinese search string in the search engine Baidu is a good practice for discovering beneficial owners found in China. |
| 3079cf4f6c02-e7c0-4a73-a132-e3d0ea3cecdd | Not Translated (0%) | If the risk exposure is high, it may be appropriate to undertake a more in-depth customer due diligence and sanctions due diligence investigation, particularly when details pertaining to beneficial ownership remain unclear. | If the risk exposure is high, it may be appropriate to undertake a more in-depth customer due diligence and sanctions due diligence investigation, particularly when details pertaining to beneficial ownership remain unclear. |
| 3080cf4f6c02-e7c0-4a73-a132-e3d0ea3cecdd | Not Translated (0%) | In addition, escalate the case to senior management or the risk committee to allow for a risk-based and well-documented decision. | In addition, escalate the case to senior management or the risk committee to allow for a risk-based and well-documented decision. |
| 3081cf4f6c02-e7c0-4a73-a132-e3d0ea3cecdd | Not Translated (0%) | Depending on the regions in which the firm is active, the available databases may not include all of the relevant information, and these sources can become outdated. | Depending on the regions in which the firm is active, the available databases may not include all of the relevant information, and these sources can become outdated. |
| 3082cf4f6c02-e7c0-4a73-a132-e3d0ea3cecdd | Not Translated (0%) | Further complicating matters, many countries do not disclose UBO information. | Further complicating matters, many countries do not disclose UBO information. |
| 3083cf4f6c02-e7c0-4a73-a132-e3d0ea3cecdd | Not Translated (0%) | In Russia, for example, access to corporate information has become more restrictive, and this is only one example of many countries for which ultimate beneficial ownership information is not available. | In Russia, for example, access to corporate information has become more restrictive, and this is only one example of many countries for which ultimate beneficial ownership information is not available. |
| 3084cf4f6c02-e7c0-4a73-a132-e3d0ea3cecdd | Not Translated (0%) | This is true for many high-risk countries in which an organization can be exposed to sanctions risks. | This is true for many high-risk countries in which an organization can be exposed to sanctions risks. |
| 3085cf4f6c02-e7c0-4a73-a132-e3d0ea3cecdd | Not Translated (0%) | If risk exposure is high, undertaking an in-depth investigation using in-country sources and engaging local country and regional experts may be the only way to determine the UBO. | If risk exposure is high, undertaking an in-depth investigation using in-country sources and engaging local country and regional experts may be the only way to determine the UBO. |
| 308613193ba5-de89-48d7-85d8-bd6434995558 | Not Translated (0%) | Managing Operational Challenges | Managing Operational Challenges |
| 3087ca4857fb-4190-497c-aacb-72934a2c6c32 | Not Translated (0%) | Several operational challenges can be encountered when attempting to identify beneficial owners, including: | Several operational challenges can be encountered when attempting to identify beneficial owners, including: |
| 308898dbee79-79e5-47d1-aeeb-6047a0cb953b | Not Translated (0%) | Limited or lack of information and transparency | Limited or lack of information and transparency |
| 3089d5b5a8fc-005a-4154-a173-422f5a27a75f | Not Translated (0%) | Lack of familiarity concerning beneficial ownership for some overseas structures | Lack of familiarity concerning beneficial ownership for some overseas structures |
| 3090f4d7ae2b-4e61-441e-b866-c0efd9133aea | Not Translated (0%) | Calculation of aggregate ownership/information about owners (i.e., is there sufficient information to determine that a sanctions target actually owns a corporate entity?) | Calculation of aggregate ownership/information about owners (i.e., is there sufficient information to determine that a sanctions target actually owns a corporate entity?) |
| 3091ba8e7685-5be1-42bc-8932-dd2e3ecf819e | Not Translated (0%) | Identification of associated persons | Identification of associated persons |
| 30924a1325c6-5718-43f4-bd12-60df057edf08 | Not Translated (0%) | Trust and veracity of information: | Trust and veracity of information: |
| 30934a1325c6-5718-43f4-bd12-60df057edf08 | Not Translated (0%) | Is the information provided by or about a customer reliable? | Is the information provided by or about a customer reliable? |
| 30944a1325c6-5718-43f4-bd12-60df057edf08 | Not Translated (0%) | Can the information provided be trusted as accurate and truthful? | Can the information provided be trusted as accurate and truthful? |
| 30954a1325c6-5718-43f4-bd12-60df057edf08 | Not Translated (0%) | This can prove to be a challenge with customers who are new to an organization. | This can prove to be a challenge with customers who are new to an organization. |
| 309628c1dfb6-7a7b-4ec6-9a94-cc36c0ddfed3 | Not Translated (0%) | Customer/intermediary cooperation: | Customer/intermediary cooperation: |
| 309728c1dfb6-7a7b-4ec6-9a94-cc36c0ddfed3 | Not Translated (0%) | Some customers or their advisors are reluctant to provide KYC/CDD, claiming that the information is confidential or illegal because of a country’s data privacy laws. | Some customers or their advisors are reluctant to provide KYC/CDD, claiming that the information is confidential or illegal because of a country’s data privacy laws. |
| 309828c1dfb6-7a7b-4ec6-9a94-cc36c0ddfed3 | Not Translated (0%) | Legal advisors can argue that the information is subject to legal privilege and refuse to provide information about, for example, a corporate structure or even a customer’s tax residency. | Legal advisors can argue that the information is subject to legal privilege and refuse to provide information about, for example, a corporate structure or even a customer’s tax residency. |
| 309928c1dfb6-7a7b-4ec6-9a94-cc36c0ddfed3 | Not Translated (0%) | Although there may be legitimate privacy concerns, an organization should be aware of the laws in its jurisdiction. | Although there may be legitimate privacy concerns, an organization should be aware of the laws in its jurisdiction. |
| 31000c0f3976-f23d-4d11-9088-0f72e4dc9306 | Not Translated (0%) | High-volume business (e.g., retail) | High-volume business (e.g., retail) |
| 3101738876a6-61b6-4c4e-a5e7-8d8d63b2c1fd | Not Translated (0%) | Data silos: | Data silos: |
| 3102738876a6-61b6-4c4e-a5e7-8d8d63b2c1fd | Not Translated (0%) | In a larger organization, a customer may have accessed services from different lines of business, and each one of them holds different SDD for the customer. | In a larger organization, a customer may have accessed services from different lines of business, and each one of them holds different SDD for the customer. |
| 3103738876a6-61b6-4c4e-a5e7-8d8d63b2c1fd | Not Translated (0%) | When this information is stored on different systems, or in different jurisdictions, it can be difficult to form a complete picture of the customer’s overall sanctions risks profile. | When this information is stored on different systems, or in different jurisdictions, it can be difficult to form a complete picture of the customer’s overall sanctions risks profile. |
| 3104c2b47dfe-24f0-4700-a5f4-c8b6d77bf38e | Not Translated (0%) | Depending on your firm’s risk appetite, sanctions risk compliance can be very simple or very complex, requiring procedures and processes to abide by strict rules. | Depending on your firm’s risk appetite, sanctions risk compliance can be very simple or very complex, requiring procedures and processes to abide by strict rules. |
| 3105c2b47dfe-24f0-4700-a5f4-c8b6d77bf38e | Not Translated (0%) | Similar to AML compliance, sanctions compliance is also risk-based, but with the additional factor that it is generally strict liability; that is, regardless of whether a firm intended to violate sanctions or knew it was violating sanctions, it can be held liable. | Similar to AML compliance, sanctions compliance is also risk-based, but with the additional factor that it is generally strict liability; that is, regardless of whether a firm intended to violate sanctions or knew it was violating sanctions, it can be held liable. |
| 3106c2b47dfe-24f0-4700-a5f4-c8b6d77bf38e | Not Translated (0%) | Additionally, if the program is not sufficiently designed, a firm can be exposed to heightened risk exposure and liability. | Additionally, if the program is not sufficiently designed, a firm can be exposed to heightened risk exposure and liability. |
| 3107c2b47dfe-24f0-4700-a5f4-c8b6d77bf38e | Not Translated (0%) | Beyond following established policies and procedures, remaining diligent, and escalating an issue when in doubt, institutions may be advised to undertake more in-depth due diligence investigations in order to mitigate risk exposure adequately. | Beyond following established policies and procedures, remaining diligent, and escalating an issue when in doubt, institutions may be advised to undertake more in-depth due diligence investigations in order to mitigate risk exposure adequately. |
| 3108c2b47dfe-24f0-4700-a5f4-c8b6d77bf38e | Not Translated (0%) | It is important that sanctions compliance programs be designed to be flexible and easily adapted to meet changes in the regulatory landscape in a timely manner. | It is important that sanctions compliance programs be designed to be flexible and easily adapted to meet changes in the regulatory landscape in a timely manner. |
| 3109038dc412-3d5a-428f-8079-1540b566e91e | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 3110038dc412-3d5a-428f-8079-1540b566e91e | Not Translated (0%) | BENEFICIAL OWNERSHIP AND RISK APPETITE | BENEFICIAL OWNERSHIP AND RISK APPETITE |
| 3111c9af40ab-388a-47e6-8c73-6f43b5d99a16 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 3112614871f3-e42e-4f9f-b70e-4c9e9e432fa9 | Not Translated (0%) | A US compliance officer working for a foreign branch in the United States had been recommended a customer from his head office in a high-risk jurisdiction that was said to be potentially lucrative for the bank. | A US compliance officer working for a foreign branch in the United States had been recommended a customer from his head office in a high-risk jurisdiction that was said to be potentially lucrative for the bank. |
| 3113614871f3-e42e-4f9f-b70e-4c9e9e432fa9 | Not Translated (0%) | The potential customer was owned 17% by a specially designated national (SDN). | The potential customer was owned 17% by a specially designated national (SDN). |
| 3114614871f3-e42e-4f9f-b70e-4c9e9e432fa9 | Not Translated (0%) | This was the first customer at the branch that had ownership exposure to a sanctioned target; previously it was understood that the branch did not engage with these types of customers. | This was the first customer at the branch that had ownership exposure to a sanctioned target; previously it was understood that the branch did not engage with these types of customers. |
| 311564681438-32ae-4b2c-a032-8aa19a15fa5d | Not Translated (0%) | Prior to onboarding the customer, the compliance officer met with the branch’s senior management to discuss establishing a risk appetite and controls to mitigate the additional risk from this new type of customer. | Prior to onboarding the customer, the compliance officer met with the branch’s senior management to discuss establishing a risk appetite and controls to mitigate the additional risk from this new type of customer. |
| 311664681438-32ae-4b2c-a032-8aa19a15fa5d | Not Translated (0%) | Next, the branch took its recommendations to the board of directors for its approval. | Next, the branch took its recommendations to the board of directors for its approval. |
| 311764681438-32ae-4b2c-a032-8aa19a15fa5d | Not Translated (0%) | The firm decided to take additional measures by updating its policies and procedures to address the new type of risk, including requiring more frequent updates from the customer of its ownership structure and closer scrutiny of trade documents prior to approving transactions. | The firm decided to take additional measures by updating its policies and procedures to address the new type of risk, including requiring more frequent updates from the customer of its ownership structure and closer scrutiny of trade documents prior to approving transactions. |
| 311864681438-32ae-4b2c-a032-8aa19a15fa5d | Not Translated (0%) | It also established risk appetite limits on the number of customers the branch would accept with SDN ownership and the highest level of SDN ownership the branch would accept, e.g., 20% aggregate ownership. | It also established risk appetite limits on the number of customers the branch would accept with SDN ownership and the highest level of SDN ownership the branch would accept, e.g., 20% aggregate ownership. |
| 311964681438-32ae-4b2c-a032-8aa19a15fa5d | Not Translated (0%) | Finally, the firm required additional reporting within the compliance committee and to the board on the customer’s volume of transactions. | Finally, the firm required additional reporting within the compliance committee and to the board on the customer’s volume of transactions. |
| 3120b3a446e8-19a2-49df-a92c-b1d005c21f00 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 31214319ebf5-bb87-48c9-b999-41941e3b1deb | Not Translated (0%) | An institution should establish written controls prior to engaging in a new type of business or with a new type of customer risk. | An institution should establish written controls prior to engaging in a new type of business or with a new type of customer risk. |
| 31222a6f36f7-6ad3-4a5a-a08b-6675093d5d29 | Not Translated (0%) | It is important to get approval from the board of directors (or equivalent) when engaging in business that exceeds the firm’s risk appetite. | It is important to get approval from the board of directors (or equivalent) when engaging in business that exceeds the firm’s risk appetite. |
| 3123874a6c45-ceda-427d-b00a-1c65b7a1c0d7 | Not Translated (0%) | The board of directors should be involved in establishing risk appetite limits and reporting requirements concerning the firm’s high-risk business activity. | The board of directors should be involved in establishing risk appetite limits and reporting requirements concerning the firm’s high-risk business activity. |
| 312445269966-caca-4290-b9bd-8d93d976c917 | Not Translated (0%) | Once beneficial ownership has been established, the institution must continually monitor the customer to be alerted to any changes to ownership and ensure that owners are screened against relevant sanctions lists in a timely manner. | Once beneficial ownership has been established, the institution must continually monitor the customer to be alerted to any changes to ownership and ensure that owners are screened against relevant sanctions lists in a timely manner. |
| 31252f30550c-41c4-48d0-8137-21d2e4f3e1e6 | Not Translated (0%) | Documenting/Reporting Beneficial Ownership Information | Documenting/Reporting Beneficial Ownership Information |
| 31262766564e-7a40-4929-93c1-72f84b5bcfb6 | Not Translated (0%) | Regulations concerning the documenting and reporting of beneficial ownership information vary. | Regulations concerning the documenting and reporting of beneficial ownership information vary. |
| 31272766564e-7a40-4929-93c1-72f84b5bcfb6 | Not Translated (0%) | In the EU, subject to data protection rules, information concerning beneficial ownership must be held in central registers in each Member State and made available to competent authorities, financial intelligence units (FIUs), obliged entities, and any person with legitimate interest. | In the EU, subject to data protection rules, information concerning beneficial ownership must be held in central registers in each Member State and made available to competent authorities, financial intelligence units (FIUs), obliged entities, and any person with legitimate interest. |
| 3128836cb0f5-0642-4ed0-ba95-32545a383735 | Not Translated (0%) | In most jurisdictions, corporate structure is distinguished between public companies and private limited companies. | In most jurisdictions, corporate structure is distinguished between public companies and private limited companies. |
| 3129836cb0f5-0642-4ed0-ba95-32545a383735 | Not Translated (0%) | For public companies, shares are freely available and traded publicly, there is usually no limit to the number of shareholders, information on its ownership and its board of directors is publicly available, and the companies are subject to significant regulation. | For public companies, shares are freely available and traded publicly, there is usually no limit to the number of shareholders, information on its ownership and its board of directors is publicly available, and the companies are subject to significant regulation. |
| 3130836cb0f5-0642-4ed0-ba95-32545a383735 | Not Translated (0%) | On the other hand, private limited companies are not publicly traded, they are restrictive in the number of shares, they have ownership that can be by one or many, and they are subject to minimal regulatory oversight. | On the other hand, private limited companies are not publicly traded, they are restrictive in the number of shares, they have ownership that can be by one or many, and they are subject to minimal regulatory oversight. |
| 313136dc17c2-92ff-437f-b826-359842469185 | Not Translated (0%) | CALCULATE BENEFICIAL OWNERSHIP | CALCULATE BENEFICIAL OWNERSHIP |
| 313214fbcd86-fc76-488b-a8c2-b23f5ce3a4d5 | Not Translated (0%) | Beneficial ownership comes into play with regard to SDD when a sanctions restriction has been imposed on an owner or controller of one of an institution’s customers. | Beneficial ownership comes into play with regard to SDD when a sanctions restriction has been imposed on an owner or controller of one of an institution’s customers. |
| 313314fbcd86-fc76-488b-a8c2-b23f5ce3a4d5 | Not Translated (0%) | It may also apply to a counterpart/non-customer/the person on the other side of the transaction, although that is much more difficult to account for. | It may also apply to a counterpart/non-customer/the person on the other side of the transaction, although that is much more difficult to account for. |
| 313414fbcd86-fc76-488b-a8c2-b23f5ce3a4d5 | Not Translated (0%) | The US’s and EU’s sanctions regimes have different requirements regarding the application of sanctions restrictions to legal entities with owners that are sanctions targets. | The US’s and EU’s sanctions regimes have different requirements regarding the application of sanctions restrictions to legal entities with owners that are sanctions targets. |
| 313549267731-bacc-4c67-9f92-3c0e23556977 | Not Translated (0%) | OFAC 50 Percent Rule | OFAC 50 Percent Rule |
| 31366130df10-87c1-4cb2-aa45-f78dd6201e28 | Not Translated (0%) | Determining ownership for SDD is different than for anti-money laundering (AML) requirements, most of which identify a beneficial owner as one that directly or indirectly owns more than 25% of a legal entity. | Determining ownership for SDD is different than for anti-money laundering (AML) requirements, most of which identify a beneficial owner as one that directly or indirectly owns more than 25% of a legal entity. |
| 31376130df10-87c1-4cb2-aa45-f78dd6201e28 | Not Translated (0%) | In contrast, for SDD, the Office of Foreign Assets Control (OFAC) in the United States applies the 50 Percent Rule to legal entity ownership, whether direct or indirect. | In contrast, for SDD, the Office of Foreign Assets Control (OFAC) in the United States applies the 50 Percent Rule to legal entity ownership, whether direct or indirect. |
| 31386130df10-87c1-4cb2-aa45-f78dd6201e28 | Not Translated (0%) | That is, if a sanctions target owns 50% or more of another legal entity, the legal entity is also subject to the sanctions restrictions—even if it is not itself named as a sanctions target. | That is, if a sanctions target owns 50% or more of another legal entity, the legal entity is also subject to the sanctions restrictions—even if it is not itself named as a sanctions target. |
| 31396130df10-87c1-4cb2-aa45-f78dd6201e28 | Not Translated (0%) | The OFAC 50 Percent Rule also requires that sanctions restrictions be applied if exactly 50% or more of the shares, or their equivalent, are owned by an individual or a legal entity that is a sanctions target. | The OFAC 50 Percent Rule also requires that sanctions restrictions be applied if exactly 50% or more of the shares, or their equivalent, are owned by an individual or a legal entity that is a sanctions target. |
| 3140d4d267f2-49e3-4cad-a970-a2754164cdd2 | Not Translated (0%) | This rule does not simply apply to the ownership of a single company; it also requires that beneficial ownership be based on the total, or aggregate, amount of shares that sanctions targets own across a corporate structure. | This rule does not simply apply to the ownership of a single company; it also requires that beneficial ownership be based on the total, or aggregate, amount of shares that sanctions targets own across a corporate structure. |
| 3141d4d267f2-49e3-4cad-a970-a2754164cdd2 | Not Translated (0%) | This rule prevents sanctions targets from creating complex corporate structures and spreading their ownership across the holding structure so they don’t hold more than 50% of any one corporate entity. | This rule prevents sanctions targets from creating complex corporate structures and spreading their ownership across the holding structure so they don’t hold more than 50% of any one corporate entity. |
| 3142d4d267f2-49e3-4cad-a970-a2754164cdd2 | Not Translated (0%) | By doing this, the sanctions target is able to circumvent sanctions and maintain access to its assets held in various entities. | By doing this, the sanctions target is able to circumvent sanctions and maintain access to its assets held in various entities. |
| 314362fcbc2e-9f15-4f6c-90e9-c033d2675d6d | Not Translated (0%) | Illustration of Aggregate Rule—Cascading | Illustration of Aggregate Rule—Cascading |
| 3144262b8844-fcf3-404e-a6d9-94bd303c8357 | Not Translated (0%) | Financial institutions must identify the connections among all of the owners and then calculate the percentages of beneficial ownership. | Financial institutions must identify the connections among all of the owners and then calculate the percentages of beneficial ownership. |
| 3145262b8844-fcf3-404e-a6d9-94bd303c8357 | Not Translated (0%) | As shown in the example in <7062/>, if a person who is a sanctions target owns 100% of one company (Company A), and that company owns 50% of a second company (Company B), then Company B is also subject to sanctions. | As shown in the example in <7062/>, if a person who is a sanctions target owns 100% of one company (Company A), and that company owns 50% of a second company (Company B), then Company B is also subject to sanctions. |
| 3146262b8844-fcf3-404e-a6d9-94bd303c8357 | Not Translated (0%) | In effect, the sanctions target owns 50% of the second company—even if the target’s name is not apparent in Company B’s website or board of directors, and even if Company B does not appear on the SDN list. | In effect, the sanctions target owns 50% of the second company—even if the target’s name is not apparent in Company B’s website or board of directors, and even if Company B does not appear on the SDN list. |
| 31475bd9126e-f8a3-45c9-9391-8c0653061101 | Not Translated (0%) | For this reason, it is never enough to simply screen the name of a legal entity that is your customer. | For this reason, it is never enough to simply screen the name of a legal entity that is your customer. |
| 31485bd9126e-f8a3-45c9-9391-8c0653061101 | Not Translated (0%) | Sanctions due diligence requires verifying whether that customer is part of a larger structure in which a sanctioned target may, in aggregate, directly or indirectly hold 50% or more ownership. | Sanctions due diligence requires verifying whether that customer is part of a larger structure in which a sanctioned target may, in aggregate, directly or indirectly hold 50% or more ownership. |
| 3149e82846ae-ab0c-413d-869e-c3f5119ee552 | Not Translated (0%) | The aggregate ownership of a corporate structure can be affected by the OFAC rule. | The aggregate ownership of a corporate structure can be affected by the OFAC rule. |
| 3150e82846ae-ab0c-413d-869e-c3f5119ee552 | Not Translated (0%) | If a company that is an SDN target holds shares in other companies that together are equal to or more than 50%, the other companies are also subject to same sanctions restrictions. | If a company that is an SDN target holds shares in other companies that together are equal to or more than 50%, the other companies are also subject to same sanctions restrictions. |
| 3151e82846ae-ab0c-413d-869e-c3f5119ee552 | Not Translated (0%) | This aggregate rule cascades down: | This aggregate rule cascades down: |
| 3152e82846ae-ab0c-413d-869e-c3f5119ee552 | Not Translated (0%) | If a company that is an SDN (Company A) owns 50% or more in another company (Company B), which holds 50% or more of another company (Company C), Company C also is subject to the same sanctions restrictions that apply to Company A. | If a company that is an SDN (Company A) owns 50% or more in another company (Company B), which holds 50% or more of another company (Company C), Company C also is subject to the same sanctions restrictions that apply to Company A. |
| 31531e7d19ac-1fe9-4455-9c1d-b759f16bc6b2 | Not Translated (0%) | EU More than 50 Percent Rule | EU More than 50 Percent Rule |
| 3154f17facb1-f942-4612-be85-fd80ac014069 | Not Translated (0%) | SDD—Key Risk Areas—Customers | SDD—Key Risk Areas—Customers |
| 3155edb585bf-8299-4ed7-b26e-e8a7603be6f9 | Not Translated (0%) | In the example shown in <7119/>, 56% of Company D is owned by Companies A and E, which are both 100% owned by Basil Smith, who is an SDN. | In the example shown in <7119/>, 56% of Company D is owned by Companies A and E, which are both 100% owned by Basil Smith, who is an SDN. |
| 3156edb585bf-8299-4ed7-b26e-e8a7603be6f9 | Not Translated (0%) | Even though Companies A and E are not SDNs, the OFAC aggregate rule applies, and they would be subject to sanctions restrictions. | Even though Companies A and E are not SDNs, the OFAC aggregate rule applies, and they would be subject to sanctions restrictions. |
| 3157edb585bf-8299-4ed7-b26e-e8a7603be6f9 | Not Translated (0%) | When performing SDD, it is important to obtain information about the owners of all corporate entities in a structure and the percentage of those holdings. | When performing SDD, it is important to obtain information about the owners of all corporate entities in a structure and the percentage of those holdings. |
| 3158178ef821-4161-4649-997f-ac9f57f17ce9 | Not Translated (0%) | There are three significant differences between OFAC and the EU’s European Best Practice Guidance concerning SDD and beneficial ownership: | There are three significant differences between OFAC and the EU’s European Best Practice Guidance concerning SDD and beneficial ownership: |
| 3159a3af526a-11e9-4d9b-94c2-cc9c82492b30 | Not Translated (0%) | The EU’s rule applies when a sanctions target owns more than 50% of a legal entity. | The EU’s rule applies when a sanctions target owns more than 50% of a legal entity. |
| 3160df59e135-e2e9-462a-b6d1-5dcd2bcfed50 | Not Translated (0%) | The EU has not yet implemented the aggregate rule. | The EU has not yet implemented the aggregate rule. |
| 31614f594bcd-3e59-4571-87bf-7d9e05cc73e3 | Not Translated (0%) | The EU requires that assets be frozen when a sanctions target “controls” or exercises influence over an entity. | The EU requires that assets be frozen when a sanctions target “controls” or exercises influence over an entity. |
| 3162ff4e7f77-de77-4866-b50a-79ab83824802 | Not Translated (0%) | Unlike the United States, the EU does not apply the aggregate rule to ownership interests separately maintained by sanctions targets under the | Unlike the United States, the EU does not apply the aggregate rule to ownership interests separately maintained by sanctions targets under the |
| 316391afae8b-27e4-4d0d-8797-57c203f035fe | Not Translated (0%) | 50 Percent Rule. | 50 Percent Rule. |
| 316491afae8b-27e4-4d0d-8797-57c203f035fe | Not Translated (0%) | However, because the EU AML Directives have required that financial institutions collect KYC for companies holding 25% or more ownership of an entity, businesses often apply this percentage as part of their sanctions compliance program. | However, because the EU AML Directives have required that financial institutions collect KYC for companies holding 25% or more ownership of an entity, businesses often apply this percentage as part of their sanctions compliance program. |
| 31657c08a3a0-e3c8-4fb8-b2f9-c0361e871a70 | Not Translated (0%) | The EU rule clearly applies to a broad range of structures, including groups of entities as well as parties that may exert influence or control over an entity, as in proprietary rights or majority interest. | The EU rule clearly applies to a broad range of structures, including groups of entities as well as parties that may exert influence or control over an entity, as in proprietary rights or majority interest. |
| 31667c08a3a0-e3c8-4fb8-b2f9-c0361e871a70 | Not Translated (0%) | For example, the EU rule would identify a situation in which an individual asks other individuals to hold his/her shares through a nominee arrangement in an attempt to hide his/her identity when he/she is in fact making significant decisions about how the entity operates or benefits financially from its activities (e.g., by acting in key roles). | For example, the EU rule would identify a situation in which an individual asks other individuals to hold his/her shares through a nominee arrangement in an attempt to hide his/her identity when he/she is in fact making significant decisions about how the entity operates or benefits financially from its activities (e.g., by acting in key roles). |
| 31677c08a3a0-e3c8-4fb8-b2f9-c0361e871a70 | Not Translated (0%) | For example, in the implementation of the Sectoral Sanctions Identifications (SSI) sanctions in 2014, Russian targets divested interest in entities prior to implementation of the US sanctions. | For example, in the implementation of the Sectoral Sanctions Identifications (SSI) sanctions in 2014, Russian targets divested interest in entities prior to implementation of the US sanctions. |
| 31687c08a3a0-e3c8-4fb8-b2f9-c0361e871a70 | Not Translated (0%) | Although this action may have circumvented the US sanctions, under the EU rule regarding control, it may not have been sufficient, as divestment does not necessarily divest control. | Although this action may have circumvented the US sanctions, under the EU rule regarding control, it may not have been sufficient, as divestment does not necessarily divest control. |
| 3169db43adad-ca83-4674-8bd2-f76229489d22 | Not Translated (0%) | The EU guidance provides a number of examples of how an individual or entity can exert control. | The EU guidance provides a number of examples of how an individual or entity can exert control. |
| 3170db43adad-ca83-4674-8bd2-f76229489d22 | Not Translated (0%) | In the example shown in , the entity comprises two different structures—companies and an underlying trust. | In the example shown in , the entity comprises two different structures—companies and an underlying trust. |
| 3171db43adad-ca83-4674-8bd2-f76229489d22 | Not Translated (0%) | The initial information received identified three individuals: | The initial information received identified three individuals: |
| 3172db43adad-ca83-4674-8bd2-f76229489d22 | Not Translated (0%) | Mr. X, Nominee Shareholder Y, and Nominee Shareholder Z. Due diligence found that Mr. X, who is named on the EU Consolidated Sanctions List, is also the sole director for Companies B and C. Under the EU guidance, as the sole director, Mr. X would be considered to be the controller of Companies B and C, which would therefore also be subject to the sanctions restrictions that have been imposed on Mr. X. The trust also may be subject to these restrictions because, as protector, Mr. X may exercise influence over the administration of the trust’s assets, including whether to replace the trustee. | Mr. X, Nominee Shareholder Y, and Nominee Shareholder Z. Due diligence found that Mr. X, who is named on the EU Consolidated Sanctions List, is also the sole director for Companies B and C. Under the EU guidance, as the sole director, Mr. X would be considered to be the controller of Companies B and C, which would therefore also be subject to the sanctions restrictions that have been imposed on Mr. X. The trust also may be subject to these restrictions because, as protector, Mr. X may exercise influence over the administration of the trust’s assets, including whether to replace the trustee. |
| 31730b3103f1-4b6f-4b98-9c52-b5ddaef7976a | Not Translated (0%) | When performing SDD, it’s important to obtain information about individuals who might control a corporate entity and documentation that describes the nature of that control. | When performing SDD, it’s important to obtain information about individuals who might control a corporate entity and documentation that describes the nature of that control. |
| 31743155db6f-d7dc-46ff-b989-dcee07e6812d | Not Translated (0%) | Beneficial Ownership: | Beneficial Ownership: |
| 31753155db6f-d7dc-46ff-b989-dcee07e6812d | Not Translated (0%) | EU | EU |
| 31765d6d5011-fbd2-43a9-8f6e-96f99df790e7 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 31775d6d5011-fbd2-43a9-8f6e-96f99df790e7 | Not Translated (0%) | BARCLAYS BANK PLC, 2016 | BARCLAYS BANK PLC, 2016 |
| 31784615733c-3fd1-41b2-81c8-cf0b7f4991b7 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 31798c1231f6-0e36-4a3b-9bf7-10007c8ad569 | Not Translated (0%) | In February of 2016, OFAC reached a $2,485,890 settlement with Barclays Bank Plc (Barclays). | In February of 2016, OFAC reached a $2,485,890 settlement with Barclays Bank Plc (Barclays). |
| 31808c1231f6-0e36-4a3b-9bf7-10007c8ad569 | Not Translated (0%) | Barclays agreed to settle its potential civil liability for 159 apparent violations of the Zimbabwe Sanctions Regulations, 31 C.F.R. Part 541. | Barclays agreed to settle its potential civil liability for 159 apparent violations of the Zimbabwe Sanctions Regulations, 31 C.F.R. Part 541. |
| 31818c1231f6-0e36-4a3b-9bf7-10007c8ad569 | Not Translated (0%) | From July 2008 to September 2013, Barclays processed 159 transactions totaling $3,375,617 to or through financial institutions located in the United States—including Barclays’s New York branch—for or on behalf of corporate customers of Barclays Bank of Zimbabwe Limited (BBZ) that were owned 50% or more, directly or indirectly, by an SDN (The Industrial Development Corporation of Zimbabwe). | From July 2008 to September 2013, Barclays processed 159 transactions totaling $3,375,617 to or through financial institutions located in the United States—including Barclays’s New York branch—for or on behalf of corporate customers of Barclays Bank of Zimbabwe Limited (BBZ) that were owned 50% or more, directly or indirectly, by an SDN (The Industrial Development Corporation of Zimbabwe). |
| 318206b2c3ba-d093-4306-8d64-620ff030377e | Not Translated (0%) | OFAC found that the bank was not able to screen beneficial owner information for its corporate customers in order to identify the presence of SDNs. | OFAC found that the bank was not able to screen beneficial owner information for its corporate customers in order to identify the presence of SDNs. |
| 318306b2c3ba-d093-4306-8d64-620ff030377e | Not Translated (0%) | It also found that, for some customers, the bank did not even know their beneficial owners were SDNs. | It also found that, for some customers, the bank did not even know their beneficial owners were SDNs. |
| 318406b2c3ba-d093-4306-8d64-620ff030377e | Not Translated (0%) | The case came about because several transactions from Barclays Bank had been blocked by US financial institutions. | The case came about because several transactions from Barclays Bank had been blocked by US financial institutions. |
| 318597ef65bf-b872-4b2d-a73f-b4af101c0508 | Not Translated (0%) | “Settlement Agreement between the US Department of the Treasury’s Office of Foreign Assets Control and Barclays Bank Plc,” US Department of the Treasury, February 8, 2016. | “Settlement Agreement between the US Department of the Treasury’s Office of Foreign Assets Control and Barclays Bank Plc,” US Department of the Treasury, February 8, 2016. |
| 3186cabc46aa-71e5-442f-97fd-3a5e3345a51e | Not Translated (0%) | , | , |
| 3187294faa4c-0339-4131-a2e9-45c090dd0940 | Not Translated (0%) | US Department of the Treasury, Enforcement Information for February 8, 2016. | US Department of the Treasury, Enforcement Information for February 8, 2016. |
| 31883978fd78-fed7-4e81-91d3-ea7421d652d0 | Not Translated (0%) | The following is a list of root causes of the noncompliance: | The following is a list of root causes of the noncompliance: |
| 31895231062a-dede-444e-95f0-6f2b1fd2cbdb | Not Translated (0%) | Initially, constraints imposed by the local Zimbabwean authorities prevented Barclays from implementing measures for complying with economic sanctions, including sanctions screening, in Zimbabwe. | Initially, constraints imposed by the local Zimbabwean authorities prevented Barclays from implementing measures for complying with economic sanctions, including sanctions screening, in Zimbabwe. |
| 319035adfd23-f0a6-4e5e-8baf-4a42205e4d3e | Not Translated (0%) | Barclays used a defective CDD system that was technically incapable of including beneficial ownership information in an electronic format; it was held only in paper form. | Barclays used a defective CDD system that was technically incapable of including beneficial ownership information in an electronic format; it was held only in paper form. |
| 319135adfd23-f0a6-4e5e-8baf-4a42205e4d3e | Not Translated (0%) | Therefore, beneficial ownership information was not included in the automated screening. | Therefore, beneficial ownership information was not included in the automated screening. |
| 319254a0f5e5-10ff-44c3-834f-b2918d60e4ab | Not Translated (0%) | For some customers, the bank did not obtain beneficial ownership information at all because its AML KYC procedures were difficult for staff members to follow. | For some customers, the bank did not obtain beneficial ownership information at all because its AML KYC procedures were difficult for staff members to follow. |
| 319379d5d1f9-4de0-45b1-9f5a-8d01d2c30592 | Not Translated (0%) | When beneficial information was identified, and the system was remediated, correct beneficial ownership information was not added to the electronic system quickly enough to prevent further violations. | When beneficial information was identified, and the system was remediated, correct beneficial ownership information was not added to the electronic system quickly enough to prevent further violations. |
| 319448c519a4-ae94-4df1-8a83-22ae571c5aba | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 3195e8481472-430f-4ba1-9498-88202e8f5b6b | Not Translated (0%) | It is critically important to obtain, hold, and update sufficient information about beneficial ownership in compliance with the 50 Percent Rule. | It is critically important to obtain, hold, and update sufficient information about beneficial ownership in compliance with the 50 Percent Rule. |
| 319647f6e047-eaf7-4a7d-96a8-136e64ec311b | Not Translated (0%) | If risk exposure is high and any uncertainty regarding the ownership structure exists due to a lack of reliable and up-to-date information, and in particular if the UBO cannot be fully identified, an organization must undertake a more in-depth due diligence investigation by using internal sources and/or external specialized investigators. | If risk exposure is high and any uncertainty regarding the ownership structure exists due to a lack of reliable and up-to-date information, and in particular if the UBO cannot be fully identified, an organization must undertake a more in-depth due diligence investigation by using internal sources and/or external specialized investigators. |
| 319787ed915f-3595-483e-bdf9-f402e538cda3 | Not Translated (0%) | This enforcement action highlights the importance for institutions with operations in countries with a significant presence of persons (individuals and entities) on the SDN list to take appropriate measures to ensure compliance with US economic sanctions laws when processing transactions on behalf of their customers to, through, or within the United States. | This enforcement action highlights the importance for institutions with operations in countries with a significant presence of persons (individuals and entities) on the SDN list to take appropriate measures to ensure compliance with US economic sanctions laws when processing transactions on behalf of their customers to, through, or within the United States. |
| 3198670435e2-e7ee-4f69-a878-ac88dd49f196 | Not Translated (0%) | It is important to assess what technology solutions an organization might be able to onboard to ensure that its sanctions compliance program can effectively manage sanctions risks. | It is important to assess what technology solutions an organization might be able to onboard to ensure that its sanctions compliance program can effectively manage sanctions risks. |
| 3199e9def8b7-7033-4a0a-a32f-dec951427211 | Not Translated (0%) | An organization must recognize that it can also be exposed to other sanctions regimes, such as the EU’s, which may have other thresholds differing from the 50 Percent Rule. | An organization must recognize that it can also be exposed to other sanctions regimes, such as the EU’s, which may have other thresholds differing from the 50 Percent Rule. |
| 3200473f3c03-1673-44da-af2f-d266c82074ac | Not Translated (0%) | Know the Customer’s Nature of Business, Products and Services, and Jurisdiction/Geography | Know the Customer’s Nature of Business, Products and Services, and Jurisdiction/Geography |
| 3201cde44ea5-6736-4972-94be-43c19ab00762 | Not Translated (0%) | The nature of a customer’s business, the goods and services it provides, and the jurisdictions in which it conducts that business are key risk areas. | The nature of a customer’s business, the goods and services it provides, and the jurisdictions in which it conducts that business are key risk areas. |
| 3202cde44ea5-6736-4972-94be-43c19ab00762 | Not Translated (0%) | Understanding these aspects of their business is an important part of SDD and compliance with sanctions requirements. | Understanding these aspects of their business is an important part of SDD and compliance with sanctions requirements. |
| 320329ff566a-795c-45d2-9c0b-9acf9d655a5e | Not Translated (0%) | NATURE OF BUSINESS AND PRODUCTS AND SERVICES | NATURE OF BUSINESS AND PRODUCTS AND SERVICES |
| 320441a33063-e28e-412d-85fd-c829619f6f0e | Not Translated (0%) | Although information about a customer’s nature of business, products, and services is collected as part of the KYC process to assess AML risks, the way in which it is assessed for sanctions risks is slightly different from that for AML KYC. | Although information about a customer’s nature of business, products, and services is collected as part of the KYC process to assess AML risks, the way in which it is assessed for sanctions risks is slightly different from that for AML KYC. |
| 3205fe3cf93f-5ec6-4ec9-b4cf-18433c2101e9 | Not Translated (0%) | Sometimes, this risk area receives a “light touch” or quick investigation, perhaps because employees conclude that a business that is identified as low risk under AML requirements is also low risk from the sanctions perspective. | Sometimes, this risk area receives a “light touch” or quick investigation, perhaps because employees conclude that a business that is identified as low risk under AML requirements is also low risk from the sanctions perspective. |
| 3206fe3cf93f-5ec6-4ec9-b4cf-18433c2101e9 | Not Translated (0%) | As a result, some businesses only rely on details provided via a customer’s website or the Standard Industrial Classification (SIC) codes on company registries to confirm the nature of their business. | As a result, some businesses only rely on details provided via a customer’s website or the Standard Industrial Classification (SIC) codes on company registries to confirm the nature of their business. |
| 3207fe3cf93f-5ec6-4ec9-b4cf-18433c2101e9 | Not Translated (0%) | However, it’s vitally important to resist making this assumption. | However, it’s vitally important to resist making this assumption. |
| 3208fe3cf93f-5ec6-4ec9-b4cf-18433c2101e9 | Not Translated (0%) | The nature of a customer’s business can potentially bring with it a number of potential sanctions risks. | The nature of a customer’s business can potentially bring with it a number of potential sanctions risks. |
| 32097fa45a42-6023-4ed0-9651-165c5101b594 | Not Translated (0%) | A good example is a case involving the PanAmerican Seed Company. | A good example is a case involving the PanAmerican Seed Company. |
| 32107fa45a42-6023-4ed0-9651-165c5101b594 | Not Translated (0%) | In 2016, OFAC fined the PanAmerican Seed Company $12 million for violating the US sanctions against Iran. | In 2016, OFAC fined the PanAmerican Seed Company $12 million for violating the US sanctions against Iran. |
| 32117fa45a42-6023-4ed0-9651-165c5101b594 | Not Translated (0%) | The US–based business, which exported flower seeds, was found guilty of indirectly exporting flower seeds to two Iranian distributors. | The US–based business, which exported flower seeds, was found guilty of indirectly exporting flower seeds to two Iranian distributors. |
| 32127fa45a42-6023-4ed0-9651-165c5101b594 | Not Translated (0%) | PanAmerican Seed shipped the seeds to consignees who were based in countries located in Europe or the Middle East. | PanAmerican Seed shipped the seeds to consignees who were based in countries located in Europe or the Middle East. |
| 32137fa45a42-6023-4ed0-9651-165c5101b594 | Not Translated (0%) | Those customers then arranged for the re-exportation of the seeds to Iran. | Those customers then arranged for the re-exportation of the seeds to Iran. |
| 3214507f8c20-210e-4f26-aa46-2aac3cbd6eb9 | Not Translated (0%) | Investigators learned that managers at PanAmerican knew about the Iran sanctions and the need to obtain a license in order to export the seeds, but they did not apply to OFAC for authorization. | Investigators learned that managers at PanAmerican knew about the Iran sanctions and the need to obtain a license in order to export the seeds, but they did not apply to OFAC for authorization. |
| 3215507f8c20-210e-4f26-aa46-2aac3cbd6eb9 | Not Translated (0%) | For AML purposes, the nature of this business would not be considered high risk; however, this example shows that the same cannot be assumed for sanctions risks. | For AML purposes, the nature of this business would not be considered high risk; however, this example shows that the same cannot be assumed for sanctions risks. |
| 321672a8f8a6-8cac-4e52-9c3f-2e06386eff4c | Not Translated (0%) | Recall that sanctions can prohibit or restrict activities, including trade in certain goods and services. | Recall that sanctions can prohibit or restrict activities, including trade in certain goods and services. |
| 321772a8f8a6-8cac-4e52-9c3f-2e06386eff4c | Not Translated (0%) | An analysis of the customer’s nature of business can be a good starting point from which to determine whether further information is required to assess the customer’s level of sanctions risk. | An analysis of the customer’s nature of business can be a good starting point from which to determine whether further information is required to assess the customer’s level of sanctions risk. |
| 321872a8f8a6-8cac-4e52-9c3f-2e06386eff4c | Not Translated (0%) | This information is also useful in detecting possible evasion attempts. | This information is also useful in detecting possible evasion attempts. |
| 3219fa8c0508-38db-49f2-9e35-f370d2462b33 | Not Translated (0%) | Other considerations about the nature of a customer’s business that are specifically relevant to sanctions risk include: | Other considerations about the nature of a customer’s business that are specifically relevant to sanctions risk include: |
| 3220dd98b384-f2db-44e8-a599-e39b2204785f | Not Translated (0%) | Activity of subsidiaries or affiliated third parties | Activity of subsidiaries or affiliated third parties |
| 32212878c9c1-ea5b-460f-bc71-1f0a481dc766 | Not Translated (0%) | Relationship/commercial connection to a sanctioned target through payments, linked accounts, or other names | Relationship/commercial connection to a sanctioned target through payments, linked accounts, or other names |
| 3222b948a769-1fb3-4a88-ac00-2d44b9d8ce69 | Not Translated (0%) | Parties forming part of the supply chain | Parties forming part of the supply chain |
| 3223d8b55591-4d99-425d-aa6e-d5bff56beb4c | Not Translated (0%) | Duration of current business activities | Duration of current business activities |
| 322450b3271d-a72f-4d3e-8ac5-42160464288f | Not Translated (0%) | These factors may be detected at onboarding as part of SDD and during the relationship by ongoing monitoring or screening controls. | These factors may be detected at onboarding as part of SDD and during the relationship by ongoing monitoring or screening controls. |
| 322550b3271d-a72f-4d3e-8ac5-42160464288f | Not Translated (0%) | If, for example, a screening identifies that one of the owners has a possible connection to a sanctions target, it would be necessary to look into any relationships (through names, payments, linked accounts, etc.) that the customer might have. | If, for example, a screening identifies that one of the owners has a possible connection to a sanctions target, it would be necessary to look into any relationships (through names, payments, linked accounts, etc.) that the customer might have. |
| 3226d5aad293-d6da-4e14-ab90-d07d7a2fc7d0 | Not Translated (0%) | Customers whose businesses involve trade-related activities warrant close attention in regard to the nature of business and products and services. | Customers whose businesses involve trade-related activities warrant close attention in regard to the nature of business and products and services. |
| 3227d5aad293-d6da-4e14-ab90-d07d7a2fc7d0 | Not Translated (0%) | Sometimes it is assumed that trade activity involving goods from a low-risk jurisdiction translates to a low sanctions risk. | Sometimes it is assumed that trade activity involving goods from a low-risk jurisdiction translates to a low sanctions risk. |
| 3228d5aad293-d6da-4e14-ab90-d07d7a2fc7d0 | Not Translated (0%) | The problem is that goods are often transshipped—i.e., the cargo is transferred from one form of transport to another via another country before arriving at its final destination. | The problem is that goods are often transshipped—i.e., the cargo is transferred from one form of transport to another via another country before arriving at its final destination. |
| 3229d5aad293-d6da-4e14-ab90-d07d7a2fc7d0 | Not Translated (0%) | The intermediate jurisdiction can have an entirely different sanctions risk profile. | The intermediate jurisdiction can have an entirely different sanctions risk profile. |
| 3230d5aad293-d6da-4e14-ab90-d07d7a2fc7d0 | Not Translated (0%) | So, a customer who buys oils from India for shipment to the United Arab Emirates may believe their supplier is in a low-risk jurisdiction. | So, a customer who buys oils from India for shipment to the United Arab Emirates may believe their supplier is in a low-risk jurisdiction. |
| 3231d5aad293-d6da-4e14-ab90-d07d7a2fc7d0 | Not Translated (0%) | However, when the goods are shipped, they can pass through sanctioned jurisdictions, elevating the sanctions risks of that customer. | However, when the goods are shipped, they can pass through sanctioned jurisdictions, elevating the sanctions risks of that customer. |
| 32320f995015-030a-424c-bc56-814de27555ee | Not Translated (0%) | Certain industries, by their nature, are more frequently subject to sanctions than others and therefore merit immediate consideration for enhanced sanctions due diligence. | Certain industries, by their nature, are more frequently subject to sanctions than others and therefore merit immediate consideration for enhanced sanctions due diligence. |
| 32330f995015-030a-424c-bc56-814de27555ee | Not Translated (0%) | Examples include customers in the oil, gas, and finance industries. | Examples include customers in the oil, gas, and finance industries. |
| 32340f995015-030a-424c-bc56-814de27555ee | Not Translated (0%) | Industries that involve multiple jurisdictions also pose a higher risk, such as insurance services and products, travel agencies, tourism businesses, luxury goods, and others. | Industries that involve multiple jurisdictions also pose a higher risk, such as insurance services and products, travel agencies, tourism businesses, luxury goods, and others. |
| 323518501f6a-c810-41f5-a79a-5305321ebaf6 | Not Translated (0%) | In these cases, consider asking questions such as: | In these cases, consider asking questions such as: |
| 323657a0778e-c59b-4691-b748-b4bac9fe1aaa | Not Translated (0%) | Are insurance products sold that cover restricted or prohibited goods? | Are insurance products sold that cover restricted or prohibited goods? |
| 32376f29ae36-d0b5-4620-83da-cf4a982bdc43 | Not Translated (0%) | Are insurance products sold that cover activities undertaken in a sanctioned jurisdiction? | Are insurance products sold that cover activities undertaken in a sanctioned jurisdiction? |
| 3238e8a55f37-262f-43ef-a07a-cc6cb79d5388 | Not Translated (0%) | If an insurable event happened there, would proceeds need to be paid into that jurisdiction? | If an insurable event happened there, would proceeds need to be paid into that jurisdiction? |
| 32397e732783-7a60-4f16-9efb-d95300f15e06 | Not Translated (0%) | Are there beneficiaries, known or unknown, that could have latent SDN risk? | Are there beneficiaries, known or unknown, that could have latent SDN risk? |
| 32407e732783-7a60-4f16-9efb-d95300f15e06 | Not Translated (0%) | If so, are they being monitored? | If so, are they being monitored? |
| 3241cbd5203f-17f9-43d3-853f-b2a4ec0d710c | Not Translated (0%) | Is the level of due diligence sufficient to mitigate the risk of the beneficiary? | Is the level of due diligence sufficient to mitigate the risk of the beneficiary? |
| 324210e4298b-e7a4-43dd-8a3f-de4a5c770606 | Not Translated (0%) | Is the company internationally active? | Is the company internationally active? |
| 3243fc1c85c3-46c8-487e-b2d9-fc0e4524d2ca | Not Translated (0%) | As part of SDD, institutions must find out whether their customers that are involved in exporting or importing have the necessary licenses, what the scope of these licenses is, and whether notifications or authorization requirements must be satisfied. | As part of SDD, institutions must find out whether their customers that are involved in exporting or importing have the necessary licenses, what the scope of these licenses is, and whether notifications or authorization requirements must be satisfied. |
| 324405ed1c83-7951-4f64-acc3-604196a3d0a1 | Not Translated (0%) | JURISDICTION/GEOGRAPHY | JURISDICTION/GEOGRAPHY |
| 32457382c87d-74c2-4715-a35b-beb03eb01ae5 | Not Translated (0%) | Another key risk area related to customers is jurisdiction or geography. | Another key risk area related to customers is jurisdiction or geography. |
| 32467382c87d-74c2-4715-a35b-beb03eb01ae5 | Not Translated (0%) | It’s important to understand a customer’s “geographic footprint.” | It’s important to understand a customer’s “geographic footprint.” |
| 32477382c87d-74c2-4715-a35b-beb03eb01ae5 | Not Translated (0%) | This term is used to describe information about individuals such as: | This term is used to describe information about individuals such as: |
| 3248945268f3-0d4e-423d-899a-392c502b7219 | Not Translated (0%) | Nationalities (current and former) | Nationalities (current and former) |
| 3249e1fef83f-dce5-41f0-acf3-fe33639c24f5 | Not Translated (0%) | Place of birth | Place of birth |
| 3250ab438a2a-950c-4fe8-8161-8bbda5ee5518 | Not Translated (0%) | Place of residence (current and former) | Place of residence (current and former) |
| 3251f0020cab-3138-4aa9-9fee-7803006b8000 | Not Translated (0%) | Place of employment | Place of employment |
| 32523d927add-0d8e-4a6d-a48e-5941502848c7 | Not Translated (0%) | Tax residency | Tax residency |
| 3253df3cfe18-d4c0-43c4-9e39-24bf14841468 | Not Translated (0%) | Occupation/travel for work (i.e., does the customer travel regularly to a country that is subject to comprehensive sanctions, and if so, how is the travel funded?) | Occupation/travel for work (i.e., does the customer travel regularly to a country that is subject to comprehensive sanctions, and if so, how is the travel funded?) |
| 32541a06de5b-f6d1-4cc7-b026-57c9f2ade7f1 | Not Translated (0%) | In regard to entities, knowing the customer’s jurisdiction/geography means determining information such as: | In regard to entities, knowing the customer’s jurisdiction/geography means determining information such as: |
| 32556170236d-7358-4013-924a-ff251e09055c | Not Translated (0%) | Location of business operations | Location of business operations |
| 3256d8c08367-36a5-4148-8654-6fdc138b081e | Not Translated (0%) | Location of customers, suppliers, affiliates, and related third parties | Location of customers, suppliers, affiliates, and related third parties |
| 3257b3e2ffde-97d3-4b33-b9d3-236102b7c633 | Not Translated (0%) | Nationality and residence of ultimate beneficial owners | Nationality and residence of ultimate beneficial owners |
| 32588eae421d-440e-4b35-a1b9-2fd0c57c87e5 | Not Translated (0%) | Tax residency of ultimate beneficial owners | Tax residency of ultimate beneficial owners |
| 3259f9c82838-ad42-4d6a-b6bc-a04a171da97b | Not Translated (0%) | Whether the customer sends or receives funds directly or indirectly to/from a country that is subject to comprehensive sanctions | Whether the customer sends or receives funds directly or indirectly to/from a country that is subject to comprehensive sanctions |
| 32601330245e-9da2-47b4-b6bc-aa68c403715e | Not Translated (0%) | Whether the customer derives services or economic value from a country that is subject to comprehensive sanctions | Whether the customer derives services or economic value from a country that is subject to comprehensive sanctions |
| 3261db263f06-fe65-4e5f-a423-b2ed3a53c940 | Not Translated (0%) | It is important to view the customer in the regional context and assess whether the entity arises from a country that borders any sanctioned jurisdiction or is known to be on the main transit route from a sanctioned jurisdiction. | It is important to view the customer in the regional context and assess whether the entity arises from a country that borders any sanctioned jurisdiction or is known to be on the main transit route from a sanctioned jurisdiction. |
| 3262db263f06-fe65-4e5f-a423-b2ed3a53c940 | Not Translated (0%) | Country risk exposure can thus often be indirect and not directly linked to the customer’s country of location. | Country risk exposure can thus often be indirect and not directly linked to the customer’s country of location. |
| 32639ac55f9c-8e8b-4e57-8656-8738b05e68cc | Not Translated (0%) | COMMON ERRORS AND ASSUMPTIONS | COMMON ERRORS AND ASSUMPTIONS |
| 32644b1ee8b8-a8ad-4013-8538-87cb058f574a | Not Translated (0%) | Within this risk area, there are some common errors and assumptions about SDD. | Within this risk area, there are some common errors and assumptions about SDD. |
| 32654b1ee8b8-a8ad-4013-8538-87cb058f574a | Not Translated (0%) | One concerns pass-through sanctions risk—the incorrect assumption that sanctions risks associated with a customer’s affiliates or subsidiaries are simply a problem for the customer to assess and manage. | One concerns pass-through sanctions risk—the incorrect assumption that sanctions risks associated with a customer’s affiliates or subsidiaries are simply a problem for the customer to assess and manage. |
| 32664b1ee8b8-a8ad-4013-8538-87cb058f574a | Not Translated (0%) | Regulators in the United Kingdom and the United States require all parties within a transaction chain to check for possible sanctions risks. | Regulators in the United Kingdom and the United States require all parties within a transaction chain to check for possible sanctions risks. |
| 32674b1ee8b8-a8ad-4013-8538-87cb058f574a | Not Translated (0%) | It is important for financial institutions to ask for and review information about a customer’s affiliates and subsidiaries. | It is important for financial institutions to ask for and review information about a customer’s affiliates and subsidiaries. |
| 3268d90a750d-1338-4da6-8ab1-ce4981da38ea | Not Translated (0%) | CASE EXAMPLE: e.l.f. | CASE EXAMPLE: e.l.f. |
| 3269d90a750d-1338-4da6-8ab1-ce4981da38ea | Not Translated (0%) | BEAUTY, 2019 | BEAUTY, 2019 |
| 3270e681b330-f695-4c8a-97d2-688d6c351783 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 32718e3126dd-96ed-45ad-bbfb-ac6e02142ce9 | Not Translated (0%) | In 2019, e.l.f. | In 2019, e.l.f. |
| 32728e3126dd-96ed-45ad-bbfb-ac6e02142ce9 | Not Translated (0%) | Beauty agreed to pay nearly $1 million to settle liabilities stemming from violations of the North Korea Sanctions Regulations. | Beauty agreed to pay nearly $1 million to settle liabilities stemming from violations of the North Korea Sanctions Regulations. |
| 32738e3126dd-96ed-45ad-bbfb-ac6e02142ce9 | Not Translated (0%) | The company had failed to undertake adequate due diligence on its suppliers and to understand its supply chain in detail. | The company had failed to undertake adequate due diligence on its suppliers and to understand its supply chain in detail. |
| 32748e3126dd-96ed-45ad-bbfb-ac6e02142ce9 | Not Translated (0%) | Through a self-audit, e.l.f. | Through a self-audit, e.l.f. |
| 32758e3126dd-96ed-45ad-bbfb-ac6e02142ce9 | Not Translated (0%) | Beauty realized that, between 2012 and 2017, it had imported 156 shipments of false eyelash kits valued at $4.43 million from two Chinese suppliers that sourced materials from North Korea. | Beauty realized that, between 2012 and 2017, it had imported 156 shipments of false eyelash kits valued at $4.43 million from two Chinese suppliers that sourced materials from North Korea. |
| 3276075a6c1e-b7fc-471d-8674-d1366a297f5b | Not Translated (0%) | Because e.l.f. self-disclosed the violations, cooperated with OFAC, and adopted an enhanced compliance program, the penalties were reduced. | Because e.l.f. self-disclosed the violations, cooperated with OFAC, and adopted an enhanced compliance program, the penalties were reduced. |
| 3277075a6c1e-b7fc-471d-8674-d1366a297f5b | Not Translated (0%) | OFAC also stated that no one at e.l.f. knew about the North Korean content, and the fake eyelash kits were not a significant part of the company’s business. | OFAC also stated that no one at e.l.f. knew about the North Korean content, and the fake eyelash kits were not a significant part of the company’s business. |
| 32783fd198cf-6cd4-440a-b368-c26d04331cbf | Not Translated (0%) | “Elf Beauty pays nearly $1 million for violating North Korean sanctions—with false eyelashes,” CNBC, January 31, 2019. | “Elf Beauty pays nearly $1 million for violating North Korean sanctions—with false eyelashes,” CNBC, January 31, 2019. |
| 3279ac25943c-65e7-462c-9905-5628d6500e5a | Not Translated (0%) | , | , |
| 328001173059-f630-4ce8-b858-a1b1e9fcbe0a | Not Translated (0%) | “Fake eyelash company fined $1m over North Korean imports,” The Guardian, February 1, 2019. | “Fake eyelash company fined $1m over North Korean imports,” The Guardian, February 1, 2019. |
| 328167cb6ce9-99c1-4017-a2f2-0c11b7385973 | Not Translated (0%) | , | , |
| 3282a7c3ee16-2c6c-4bee-a4fd-55c118ad840f | Not Translated (0%) | US Department of the Treasury, Enforcement Information for January 31, 2019. | US Department of the Treasury, Enforcement Information for January 31, 2019. |
| 3283305c0daa-fb18-4842-af35-a4d49962c355 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 3284b28107cf-871f-4b9a-a786-875200bff578 | Not Translated (0%) | An organization should undertake an adequate risk assessment of a customer’s geographic risk exposure. | An organization should undertake an adequate risk assessment of a customer’s geographic risk exposure. |
| 3285db2a800c-638d-4546-93ae-3c07245e8025 | Not Translated (0%) | It is important to identify third parties in the customer’s supply chain and undertake enhanced SDD on those parties that pose a higher risk exposure due to geographic location and other risk factors, such as complex supply chains and other issues linked to lack of transparency. | It is important to identify third parties in the customer’s supply chain and undertake enhanced SDD on those parties that pose a higher risk exposure due to geographic location and other risk factors, such as complex supply chains and other issues linked to lack of transparency. |
| 3286a1034884-1294-4a84-9519-9a4e3e474ece | Not Translated (0%) | Organizations should undertake regular audits of sanctions risk exposure, even for those parts of the business that are not main revenue drivers. | Organizations should undertake regular audits of sanctions risk exposure, even for those parts of the business that are not main revenue drivers. |
| 3287c3d2dbc6-0775-40a1-beec-6967f9393562 | Not Translated (0%) | METHODS AND TOOLS | METHODS AND TOOLS |
| 3288b45d022f-d9e2-4c56-874e-3e6f54024c4f | Not Translated (0%) | Comprehensive SDD methods and tools have been developed to gather the necessary information from customers and third parties in order to identify and assess possible sanctions risks connected to them. | Comprehensive SDD methods and tools have been developed to gather the necessary information from customers and third parties in order to identify and assess possible sanctions risks connected to them. |
| 3289b45d022f-d9e2-4c56-874e-3e6f54024c4f | Not Translated (0%) | These include customer questionnaires, databases and other information sources, relationship managers and frontline staff, and the customer. | These include customer questionnaires, databases and other information sources, relationship managers and frontline staff, and the customer. |
| 32905d840090-99dd-41bb-837e-af63ec22d686 | Not Translated (0%) | Based on the level of risk involved, certain information should be verified, such as the identity of the individual opening the account. | Based on the level of risk involved, certain information should be verified, such as the identity of the individual opening the account. |
| 32915d840090-99dd-41bb-837e-af63ec22d686 | Not Translated (0%) | For information verification, it is important that the source referenced is reliable, current, and independent. | For information verification, it is important that the source referenced is reliable, current, and independent. |
| 3292eb075248-4c59-47ec-aa84-6ab4b9ee000f | Not Translated (0%) | The SDD research model follows that of the KYC research model and involves four steps: assess, explore, organize, and present. | The SDD research model follows that of the KYC research model and involves four steps: assess, explore, organize, and present. |
| 3293f1ab8109-dde5-4ada-a4d0-8a5f7fb6aea8 | Not Translated (0%) | Assess: | Assess: |
| 3294f1ab8109-dde5-4ada-a4d0-8a5f7fb6aea8 | Not Translated (0%) | “What do we need to know?” | “What do we need to know?” |
| 3295f1ab8109-dde5-4ada-a4d0-8a5f7fb6aea8 | Not Translated (0%) | Determine what information the firm already knows, what information is missing, and how to most effectively collect that information. | Determine what information the firm already knows, what information is missing, and how to most effectively collect that information. |
| 32967f22e3b2-90dd-446e-9aba-3590df6eb99b | Not Translated (0%) | Explore: | Explore: |
| 32977f22e3b2-90dd-446e-9aba-3590df6eb99b | Not Translated (0%) | “Where can we find the answers?” | “Where can we find the answers?” |
| 32987f22e3b2-90dd-446e-9aba-3590df6eb99b | Not Translated (0%) | This step involves executing the plan created to collect the necessary information. | This step involves executing the plan created to collect the necessary information. |
| 32997f22e3b2-90dd-446e-9aba-3590df6eb99b | Not Translated (0%) | It includes expanding the firm’s research toolkit and effectively using time and effort. | It includes expanding the firm’s research toolkit and effectively using time and effort. |
| 330025d3bbd7-460b-4582-ac5b-b860d197dbcc | Not Translated (0%) | Organize: | Organize: |
| 330125d3bbd7-460b-4582-ac5b-b860d197dbcc | Not Translated (0%) | “How do we make customer information meaningful?” | “How do we make customer information meaningful?” |
| 330225d3bbd7-460b-4582-ac5b-b860d197dbcc | Not Translated (0%) | Organize and structure the information collected in a meaningful way according to the firm’s risk-based approach. | Organize and structure the information collected in a meaningful way according to the firm’s risk-based approach. |
| 3303c96bfae2-b468-4a38-ae0c-949556412f07 | Not Translated (0%) | Present: | Present: |
| 3304c96bfae2-b468-4a38-ae0c-949556412f07 | Not Translated (0%) | “How do we present customer information in a manner to fulfill its purpose, i.e., aid in the detection of suspicious activity?” | “How do we present customer information in a manner to fulfill its purpose, i.e., aid in the detection of suspicious activity?” |
| 3305c96bfae2-b468-4a38-ae0c-949556412f07 | Not Translated (0%) | Present the information collected in a meaningful way according to the firm’s risk-based approach. | Present the information collected in a meaningful way according to the firm’s risk-based approach. |
| 33062013cecc-4097-4909-8d49-45e828fc04b8 | Not Translated (0%) | Customer Questionnaire | Customer Questionnaire |
| 330749211b2d-4d06-42e7-9ecb-52fbcd1beab4 | Not Translated (0%) | Using a risk-based approach, most financial institutions use a customer questionnaire to collect information about potential sanctions risks from customers and third parties. | Using a risk-based approach, most financial institutions use a customer questionnaire to collect information about potential sanctions risks from customers and third parties. |
| 330849211b2d-4d06-42e7-9ecb-52fbcd1beab4 | Not Translated (0%) | The customer is responsible for completing it at the beginning of the relationship and supplying supporting information. | The customer is responsible for completing it at the beginning of the relationship and supplying supporting information. |
| 330949211b2d-4d06-42e7-9ecb-52fbcd1beab4 | Not Translated (0%) | An organization should then supplement the questionnaire with additional, verified information. | An organization should then supplement the questionnaire with additional, verified information. |
| 331009cab452-0b4c-4535-979e-067031ffc35a | Not Translated (0%) | Given the amount of information that must be collected, many financial institutions have moved their questionnaires online with forms designed to be responsive to the answers provided by the customer. | Given the amount of information that must be collected, many financial institutions have moved their questionnaires online with forms designed to be responsive to the answers provided by the customer. |
| 331109cab452-0b4c-4535-979e-067031ffc35a | Not Translated (0%) | For example, if the customer answers “yes” to a question, there are following questions or requests for further information. | For example, if the customer answers “yes” to a question, there are following questions or requests for further information. |
| 331209cab452-0b4c-4535-979e-067031ffc35a | Not Translated (0%) | These forms force field validation, so that the information collected is in a consistent format and all required fields are completed. | These forms force field validation, so that the information collected is in a consistent format and all required fields are completed. |
| 331309cab452-0b4c-4535-979e-067031ffc35a | Not Translated (0%) | Application program interfaces (APIs) are often embedded into these applications to conduct watchlist screening in near real-time and prompt additional questions. | Application program interfaces (APIs) are often embedded into these applications to conduct watchlist screening in near real-time and prompt additional questions. |
| 33146c768a9d-9395-40b4-9697-a0df9c1b9b89 | Not Translated (0%) | It’s important to remember that questionnaires and forms that use decision logic—whether paper or electronic—do not replace good human judgment. | It’s important to remember that questionnaires and forms that use decision logic—whether paper or electronic—do not replace good human judgment. |
| 33156c768a9d-9395-40b4-9697-a0df9c1b9b89 | Not Translated (0%) | If any doubts remain, or it is apparent at this stage that the customer already bears a heightened risk, it is important to undertake independent research. | If any doubts remain, or it is apparent at this stage that the customer already bears a heightened risk, it is important to undertake independent research. |
| 33166c768a9d-9395-40b4-9697-a0df9c1b9b89 | Not Translated (0%) | If information is lacking, an organization should engage expert advisors to undertake an in-depth due diligence investigation. | If information is lacking, an organization should engage expert advisors to undertake an in-depth due diligence investigation. |
| 3317f3c759b3-2a5a-4a8c-aee5-d318bfd44acf | Not Translated (0%) | Databases and Other Information Sources | Databases and Other Information Sources |
| 3318b56ad820-9b27-412c-b5f7-9d141d4bb4a4 | Not Translated (0%) | When a financial institution determines that a customer may present an elevated sanctions risk, it is necessary to collect further information. | When a financial institution determines that a customer may present an elevated sanctions risk, it is necessary to collect further information. |
| 3319b56ad820-9b27-412c-b5f7-9d141d4bb4a4 | Not Translated (0%) | In some parts of the world, such research is greatly facilitated by the use of online tools. | In some parts of the world, such research is greatly facilitated by the use of online tools. |
| 332042f91b49-34a2-4220-a53d-96e96311b8b1 | Not Translated (0%) | Although many firms use third-party software to assist with the due diligence process, many of these programs lack all of the necessary information. | Although many firms use third-party software to assist with the due diligence process, many of these programs lack all of the necessary information. |
| 332142f91b49-34a2-4220-a53d-96e96311b8b1 | Not Translated (0%) | Open-source programs can be useful to supplement SDD. | Open-source programs can be useful to supplement SDD. |
| 332242f91b49-34a2-4220-a53d-96e96311b8b1 | Not Translated (0%) | Examples of open-source programs include: | Examples of open-source programs include: |
| 33239b5106b8-2c03-406b-ae27-eb54ab9b4cc3 | Not Translated (0%) | Google | Google |
| 332421a15ab9-fdd0-4850-aeb5-8410f245faec | Not Translated (0%) | Colossus—search engine with a list of country-specific search engines | Colossus—search engine with a list of country-specific search engines |
| 33257aff1fe2-cdb6-4b35-bbc6-1cb45146213c | Not Translated (0%) | Archive.org—a nonprofit library of internet sites and other digital, historic media | Archive.org—a nonprofit library of internet sites and other digital, historic media |
| 3326f4fc495c-bb7c-4254-aeec-32461d60d79f | Not Translated (0%) | The Investigative Project on Terrorism—a list of groups and individuals who might be on watchlists | The Investigative Project on Terrorism—a list of groups and individuals who might be on watchlists |
| 332783344aaf-a6f9-498a-9fc5-15d35cb5f43f | Not Translated (0%) | Financial Regulators Gateway—provides access to multiple regulatory websites and laws | Financial Regulators Gateway—provides access to multiple regulatory websites and laws |
| 33285158ed2f-dd15-4a7b-9d03-c882e990af1f | Not Translated (0%) | Moneylaundering.com—ACAMS’s newsletter | Moneylaundering.com—ACAMS’s newsletter |
| 33294cc0078f-72b4-4dd8-8d5e-edc2b37a00f3 | Not Translated (0%) | Expert investigators and providers of in-depth due diligence reports can clarify allegations that have been retrieved from third-party databases and open source information, and provide support in the form of in-depth insights into the transparency of ownership structures and other elements that can affect the sanctions risk rating of a customer. | Expert investigators and providers of in-depth due diligence reports can clarify allegations that have been retrieved from third-party databases and open source information, and provide support in the form of in-depth insights into the transparency of ownership structures and other elements that can affect the sanctions risk rating of a customer. |
| 33301166d0cc-119c-441d-b22a-c256eea4a6ed | Not Translated (0%) | Relationship Managers and Frontline Staff | Relationship Managers and Frontline Staff |
| 3331118c1f71-ddbb-45aa-ba3d-d66a6a6db75f | Not Translated (0%) | Relationship managers and other customer-facing staff will be best placed to conduct customer outreach and communicate the findings to the compliance function. | Relationship managers and other customer-facing staff will be best placed to conduct customer outreach and communicate the findings to the compliance function. |
| 3332118c1f71-ddbb-45aa-ba3d-d66a6a6db75f | Not Translated (0%) | These individuals are closest to customers and counterparties during onboarding. | These individuals are closest to customers and counterparties during onboarding. |
| 33334265f424-15a6-4036-aa60-8b8f745e81e7 | Not Translated (0%) | Based on sanctions risk indicators communicated by the sanctions compliance officer (SCO), the first line of defense should detect any sanctions-relevant issues and report them to the SCO. | Based on sanctions risk indicators communicated by the sanctions compliance officer (SCO), the first line of defense should detect any sanctions-relevant issues and report them to the SCO. |
| 33344265f424-15a6-4036-aa60-8b8f745e81e7 | Not Translated (0%) | In addition, they should notify the second line of defense of any changes to sanctions risks that are identified throughout the business relationship when the customer expands the products and services it offers. | In addition, they should notify the second line of defense of any changes to sanctions risks that are identified throughout the business relationship when the customer expands the products and services it offers. |
| 33354265f424-15a6-4036-aa60-8b8f745e81e7 | Not Translated (0%) | The first line should also assist the SCO in responding promptly to any requests for information (RFI), maintain an awareness of sanctions, and understand sanctions risks by participating in sanctions-related training. | The first line should also assist the SCO in responding promptly to any requests for information (RFI), maintain an awareness of sanctions, and understand sanctions risks by participating in sanctions-related training. |
| 3336ba7da737-fb30-4438-a321-bd7324c80655 | Not Translated (0%) | Know Your High-Risk Lines of Business | Know Your High-Risk Lines of Business |
| 33376a819bae-81dc-456c-af33-dc84c54fe4a0 | Not Translated (0%) | Sanctions customer due diligence can vary based on the type of business line, product, and service offering. | Sanctions customer due diligence can vary based on the type of business line, product, and service offering. |
| 33386a819bae-81dc-456c-af33-dc84c54fe4a0 | Not Translated (0%) | Specific types of businesses that warrant special mention are retail banking, wealth management and private banking, commercial and investment banking, trade-related activity, correspondent banking, luxury goods, and insurance, among other industries. | Specific types of businesses that warrant special mention are retail banking, wealth management and private banking, commercial and investment banking, trade-related activity, correspondent banking, luxury goods, and insurance, among other industries. |
| 333991c90997-c80d-4a9e-8c72-94201c7b533a | Not Translated (0%) | RETAIL BANKING | RETAIL BANKING |
| 3340002a54ae-ff71-44eb-8be4-952516808867 | Not Translated (0%) | The information necessary to assess sanctions risk in retail banking is relatively straightforward. | The information necessary to assess sanctions risk in retail banking is relatively straightforward. |
| 3341002a54ae-ff71-44eb-8be4-952516808867 | Not Translated (0%) | In terms of customer, the financial institution will request the general information described above, including the identification requirements for individuals and legal entities that will allow the institution to screen the customer’s data against sanctions lists. | In terms of customer, the financial institution will request the general information described above, including the identification requirements for individuals and legal entities that will allow the institution to screen the customer’s data against sanctions lists. |
| 33427cf92708-85ce-4944-ac25-17dcb16946c4 | Not Translated (0%) | For the nature of business, it is helpful to identify any activity considered inconsistent with the expected account activity. | For the nature of business, it is helpful to identify any activity considered inconsistent with the expected account activity. |
| 33437cf92708-85ce-4944-ac25-17dcb16946c4 | Not Translated (0%) | Review the occupation or business activity of the customer, the products and services they offer, and the services they are seeking as a customer. | Review the occupation or business activity of the customer, the products and services they offer, and the services they are seeking as a customer. |
| 33447cf92708-85ce-4944-ac25-17dcb16946c4 | Not Translated (0%) | For example, a customer who wants to open a single checking/current account exclusively for domestic transactions poses less risk than a customer who makes regular use of international electronic funds transfers. | For example, a customer who wants to open a single checking/current account exclusively for domestic transactions poses less risk than a customer who makes regular use of international electronic funds transfers. |
| 33457cf92708-85ce-4944-ac25-17dcb16946c4 | Not Translated (0%) | The counterparties with whom a customer plans to do business would also be relevant. | The counterparties with whom a customer plans to do business would also be relevant. |
| 3346180bfb9b-d629-47b0-a9f8-8848b2bde833 | Not Translated (0%) | For jurisdiction/geography, consider the following factors as part of the effort to fully understand this risk area: | For jurisdiction/geography, consider the following factors as part of the effort to fully understand this risk area: |
| 334794b9e101-e122-4e45-a576-d388f570d6c1 | Not Translated (0%) | Tax residence | Tax residence |
| 3348ff8c9260-00e9-4bf5-9ac8-0145348193f3 | Not Translated (0%) | Employment | Employment |
| 3349c9d4657f-6846-4cea-957e-0438be4cfdf8 | Not Translated (0%) | Family connections | Family connections |
| 33503ca77b3a-52e9-4998-abac-bce20c3dd539 | Not Translated (0%) | Location of other accounts | Location of other accounts |
| 3351b2ad0428-13ec-41ef-8aa9-dd6315bd9c98 | Not Translated (0%) | Location of property/assets | Location of property/assets |
| 33526968422d-c2b0-4079-8340-7ef9d234e7f5 | Not Translated (0%) | Other business interests | Other business interests |
| 3353c3980404-4819-42db-bf3f-6bb414c98b2b | Not Translated (0%) | Travel | Travel |
| 33541d1d4212-c449-4361-ba15-d5c57712350c | Not Translated (0%) | Diplomats and international students, for example, would have a broader geographic risk exposure than a municipal clerk, due to the nature of their occupations. | Diplomats and international students, for example, would have a broader geographic risk exposure than a municipal clerk, due to the nature of their occupations. |
| 33551d1d4212-c449-4361-ba15-d5c57712350c | Not Translated (0%) | The more connections an individual has to a sanctioned country, the greater the risk that the individual could be conducting transactions and activities that are sanctioned. | The more connections an individual has to a sanctioned country, the greater the risk that the individual could be conducting transactions and activities that are sanctioned. |
| 33561d1d4212-c449-4361-ba15-d5c57712350c | Not Translated (0%) | Never assume that sanctions risks are low just because the line of business is considered to be low risk. | Never assume that sanctions risks are low just because the line of business is considered to be low risk. |
| 335722de2fe9-03bc-42ec-8c84-c17e2f781307 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 335822de2fe9-03bc-42ec-8c84-c17e2f781307 | Not Translated (0%) | LIBYA | LIBYA |
| 33591b3495b0-d1b3-4eda-91a4-0eef3ebae268 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 33602419bd28-dd6f-482d-a3f1-74ad5a5bd43d | Not Translated (0%) | Some years ago, the United Nations enacted sanctions against certain leaders of Libya, including Muammar Gaddafi. | Some years ago, the United Nations enacted sanctions against certain leaders of Libya, including Muammar Gaddafi. |
| 33612419bd28-dd6f-482d-a3f1-74ad5a5bd43d | Not Translated (0%) | His son, Saadi Gaddafi, was also listed as a sanctions target. | His son, Saadi Gaddafi, was also listed as a sanctions target. |
| 33622419bd28-dd6f-482d-a3f1-74ad5a5bd43d | Not Translated (0%) | Following the adoption of the sanctions, it was discovered that Saadi had opened retail bank accounts in Canada and had purchased an apartment in Toronto. | Following the adoption of the sanctions, it was discovered that Saadi had opened retail bank accounts in Canada and had purchased an apartment in Toronto. |
| 336308cc4cf9-4228-4d5a-a73f-bc60cfa8b9a1 | Not Translated (0%) | To avoid detection, Saadi had given the bank and the party who arranged the purchase of his apartment a different name from the one by which he was identified in the sanctions listing. | To avoid detection, Saadi had given the bank and the party who arranged the purchase of his apartment a different name from the one by which he was identified in the sanctions listing. |
| 3364f3861ee6-e8e8-4c71-a58b-af916be9981a | Not Translated (0%) | He changed the spelling of his last name by using the letter “K” to Kaddafi instead of the letter “G.” | He changed the spelling of his last name by using the letter “K” to Kaddafi instead of the letter “G.” |
| 3365b5be44f8-534c-41a3-b4e0-9d6f1d1f64f7 | Not Translated (0%) | “Is this house the key to seizing Gaddafi assets in the UK?” | “Is this house the key to seizing Gaddafi assets in the UK?” |
| 3366b5be44f8-534c-41a3-b4e0-9d6f1d1f64f7 | Not Translated (0%) | BBC News, December 16, 2011. | BBC News, December 16, 2011. |
| 3367215a049c-f3e8-47fd-9255-d81d9eb9846b | Not Translated (0%) | , | , |
| 336855c094a2-4d39-433b-b04d-ac7714665d62 | Not Translated (0%) | “The Gaddafi clan: | “The Gaddafi clan: |
| 336955c094a2-4d39-433b-b04d-ac7714665d62 | Not Translated (0%) | Where are they now?” | Where are they now?” |
| 337055c094a2-4d39-433b-b04d-ac7714665d62 | Not Translated (0%) | BBC News, October 20, 2012. | BBC News, October 20, 2012. |
| 3371968efa37-f529-4c90-9268-d5e70c518531 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 337275f85dcd-2718-4295-b35c-7eeca10e92a4 | Not Translated (0%) | For customer risk, the bank should have asked for proof of name, date of birth, or nationality. | For customer risk, the bank should have asked for proof of name, date of birth, or nationality. |
| 337375f85dcd-2718-4295-b35c-7eeca10e92a4 | Not Translated (0%) | If the bank had had an automatic screening tool, its partial matching feature could have detected a similarity in name to Saadi, the sanctions target. | If the bank had had an automatic screening tool, its partial matching feature could have detected a similarity in name to Saadi, the sanctions target. |
| 3374b23b43e1-0a75-4e41-a4ce-6bd1551ca8b7 | Not Translated (0%) | For the nature of business, the bank could have asked why he wanted to buy a property in Canada. | For the nature of business, the bank could have asked why he wanted to buy a property in Canada. |
| 3375b23b43e1-0a75-4e41-a4ce-6bd1551ca8b7 | Not Translated (0%) | For example, the bank could have asked if he had business there, what he was going to use the bank account for, and what was the source of the funds being transferred to open the account. | For example, the bank could have asked if he had business there, what he was going to use the bank account for, and what was the source of the funds being transferred to open the account. |
| 3376b23b43e1-0a75-4e41-a4ce-6bd1551ca8b7 | Not Translated (0%) | How did Saadi come by the money to buy the apartment? | How did Saadi come by the money to buy the apartment? |
| 3377b23b43e1-0a75-4e41-a4ce-6bd1551ca8b7 | Not Translated (0%) | What was his known occupation and source of wealth? | What was his known occupation and source of wealth? |
| 3378b4d68a37-afa8-4bca-bdb6-a5dd77126d8c | Not Translated (0%) | For jurisdiction/geography, the facts that Saadi was opening an account in Canada (where he had no residence), that he was not a Canadian resident, and that he last resided in Libya would likely have raised some sanctions risk red flags. | For jurisdiction/geography, the facts that Saadi was opening an account in Canada (where he had no residence), that he was not a Canadian resident, and that he last resided in Libya would likely have raised some sanctions risk red flags. |
| 3379afc459ae-ffac-4889-b7b0-b184ed54d2c1 | Not Translated (0%) | WEALTH MANAGEMENT AND PRIVATE BANKING | WEALTH MANAGEMENT AND PRIVATE BANKING |
| 33809ba7bd62-d298-4d58-ae38-61750168f067 | Not Translated (0%) | Wealth management and private banking can present different sanctions due diligence challenges from retail banking. | Wealth management and private banking can present different sanctions due diligence challenges from retail banking. |
| 33819ba7bd62-d298-4d58-ae38-61750168f067 | Not Translated (0%) | As shown in <7697/>, known sanctions risks in these lines of business include: | As shown in <7697/>, known sanctions risks in these lines of business include: |
| 3382fa48dd7f-f51d-498d-9e3d-c02f9d28ea6b | Not Translated (0%) | Use of legal entities and complex structures; for example, for estate planning | Use of legal entities and complex structures; for example, for estate planning |
| 33839bbd6850-5378-404c-8c46-914be2ca352c | Not Translated (0%) | Maintenance of wealth and assets in numerous jurisdictions | Maintenance of wealth and assets in numerous jurisdictions |
| 338478c95c8d-1042-469d-abdf-25e9f960def3 | Not Translated (0%) | The involvement of intermediaries or advisors who might act on behalf of and on the instructions of the customer | The involvement of intermediaries or advisors who might act on behalf of and on the instructions of the customer |
| 338576b42933-1ef5-4951-ada7-d3411a7a4c34 | Not Translated (0%) | Investments or assets potentially connected to sanctioned targets | Investments or assets potentially connected to sanctioned targets |
| 33861411e286-d716-46a9-9c17-7654c230eb98 | Not Translated (0%) | Culture of secrecy and anonymity | Culture of secrecy and anonymity |
| 338727f96b9a-dc10-4abd-a55d-81cbf024d10a | Not Translated (0%) | Wealth derived from complex business activities and ventures that may be difficult to verify as “clean,” including from government contracts and foreign investments | Wealth derived from complex business activities and ventures that may be difficult to verify as “clean,” including from government contracts and foreign investments |
| 3388f1c5245b-5905-444d-a763-81206c9ffa8b | Not Translated (0%) | SDD—Wealth Management/Private Banking Known Sanctions Risks | SDD—Wealth Management/Private Banking Known Sanctions Risks |
| 33895794b26a-0497-4988-a864-34c30775e358 | Not Translated (0%) | There are several key sanctions risk areas in these lines of business. | There are several key sanctions risk areas in these lines of business. |
| 33905794b26a-0497-4988-a864-34c30775e358 | Not Translated (0%) | Customers are likely to use or involve complex ownership structures; therefore, the main risk is the level of complexity. | Customers are likely to use or involve complex ownership structures; therefore, the main risk is the level of complexity. |
| 33915794b26a-0497-4988-a864-34c30775e358 | Not Translated (0%) | It is difficult to identify the owners and controllers. | It is difficult to identify the owners and controllers. |
| 33925794b26a-0497-4988-a864-34c30775e358 | Not Translated (0%) | In these cases it is necessary to obtain sufficient information about the structures to ensure the customer does not have a beneficial owner who is a sanctions target and determine that none of the entities involved are captured by either the EU or US beneficial ownership rules. | In these cases it is necessary to obtain sufficient information about the structures to ensure the customer does not have a beneficial owner who is a sanctions target and determine that none of the entities involved are captured by either the EU or US beneficial ownership rules. |
| 33935e651490-8df9-4ae9-91c5-0521eaefc230 | Not Translated (0%) | Customers in wealth management and private banking are more likely to have connections and associations with individuals worldwide, some of whom can be or could later become sanctions targets. | Customers in wealth management and private banking are more likely to have connections and associations with individuals worldwide, some of whom can be or could later become sanctions targets. |
| 33945e651490-8df9-4ae9-91c5-0521eaefc230 | Not Translated (0%) | Ensure that relationships with external parties are understood and the identity of all parties is disclosed. | Ensure that relationships with external parties are understood and the identity of all parties is disclosed. |
| 3395d654dbcf-1bc7-41d7-8fd4-6f6f7cc8252b | Not Translated (0%) | With regard to nature of business, the wealth management and private banking business lines can often involve the purchase and trading of investments. | With regard to nature of business, the wealth management and private banking business lines can often involve the purchase and trading of investments. |
| 3396d654dbcf-1bc7-41d7-8fd4-6f6f7cc8252b | Not Translated (0%) | Check that the products and investments involved are not restricted under Russian sectoral or Venezuelan sanctions. | Check that the products and investments involved are not restricted under Russian sectoral or Venezuelan sanctions. |
| 3397d654dbcf-1bc7-41d7-8fd4-6f6f7cc8252b | Not Translated (0%) | Often businesses use intermediaries to manage the financial institution on their behalf, including lawyers, investment advisors, family office managers, and accountants. | Often businesses use intermediaries to manage the financial institution on their behalf, including lawyers, investment advisors, family office managers, and accountants. |
| 3398d654dbcf-1bc7-41d7-8fd4-6f6f7cc8252b | Not Translated (0%) | Although some intermediaries are trustworthy and have good intentions, others can conceal the identity of the customer for whom they act. | Although some intermediaries are trustworthy and have good intentions, others can conceal the identity of the customer for whom they act. |
| 3399d654dbcf-1bc7-41d7-8fd4-6f6f7cc8252b | Not Translated (0%) | For this reason, financial institutions must seek complete information about their identity, who they represent, what authority they have, etc. The intermediaries should be screened as well. | For this reason, financial institutions must seek complete information about their identity, who they represent, what authority they have, etc. The intermediaries should be screened as well. |
| 3400dfb820a7-0909-45c9-b347-85ebef095b80 | Not Translated (0%) | To assess the jurisdiction/geography factor, examine the complexity of structures used, the established assets, the location of associates, and the origin of funds. | To assess the jurisdiction/geography factor, examine the complexity of structures used, the established assets, the location of associates, and the origin of funds. |
| 3401dfb820a7-0909-45c9-b347-85ebef095b80 | Not Translated (0%) | Investigate from where the funds were generated and the nature of the business activities involved. | Investigate from where the funds were generated and the nature of the business activities involved. |
| 3402dfb820a7-0909-45c9-b347-85ebef095b80 | Not Translated (0%) | As an example, wealth derived from oil from a country where sanctions are in place could indicate possible circumvention. | As an example, wealth derived from oil from a country where sanctions are in place could indicate possible circumvention. |
| 3403dfb820a7-0909-45c9-b347-85ebef095b80 | Not Translated (0%) | Determine whether any travel accounts are held in other countries. | Determine whether any travel accounts are held in other countries. |
| 3404922dbf67-79cf-4866-920c-77f1ae95a6d5 | Not Translated (0%) | In wealth management and private banking, owners and controllers often do not hold assets in their name. | In wealth management and private banking, owners and controllers often do not hold assets in their name. |
| 3405922dbf67-79cf-4866-920c-77f1ae95a6d5 | Not Translated (0%) | This arrangement can be made to address legitimate privacy concerns, but it can also be made to hide the identity of the true owner or controller. | This arrangement can be made to address legitimate privacy concerns, but it can also be made to hide the identity of the true owner or controller. |
| 3406e0b6d422-d926-4b8c-8d3e-dba41baeca95 | Not Translated (0%) | Owners tend to use third parties as: | Owners tend to use third parties as: |
| 340777ce5189-5d1d-4843-94ce-caef1f2207eb | Not Translated (0%) | Nominee or proxy directors | Nominee or proxy directors |
| 3408501a025f-18a1-4bb3-97f5-c196d0318db0 | Not Translated (0%) | Nominee shareholders | Nominee shareholders |
| 3409a9b78392-42d9-46ff-9c55-1e6fe5d1fc04 | Not Translated (0%) | Settlors/protectors | Settlors/protectors |
| 3410997e11bd-6271-4319-97fa-6ffd0bd571df | Not Translated (0%) | Parties exercising powers under a power of attorney | Parties exercising powers under a power of attorney |
| 3411e97f67ce-9e6c-415a-aa5e-1ac94395dce7 | Not Translated (0%) | Authorized signatories | Authorized signatories |
| 34124c061db6-566e-4067-8f10-e98a62b9c3aa | Not Translated (0%) | Investment managers/advisors | Investment managers/advisors |
| 341304007a39-dd87-4f20-90d8-f6e5bb599f4a | Not Translated (0%) | To ensure that the real owners or controllers have been correctly identified, financial institutions must undertake SDD on these third parties and fully understand the roles they play in managing or dealing with the customer’s assets. | To ensure that the real owners or controllers have been correctly identified, financial institutions must undertake SDD on these third parties and fully understand the roles they play in managing or dealing with the customer’s assets. |
| 341404007a39-dd87-4f20-90d8-f6e5bb599f4a | Not Translated (0%) | If they act on behalf of someone, identify this individual. | If they act on behalf of someone, identify this individual. |
| 3415d1a9ced3-7f17-49c2-acff-0386a1ad7db7 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 3416d1a9ced3-7f17-49c2-acff-0386a1ad7db7 | Not Translated (0%) | RIGGS BANK, 2004 | RIGGS BANK, 2004 |
| 34170dd8316c-61fc-429d-8f86-ee6111fd8304 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 341872854960-dcbd-4cb8-93a1-85304bfb53eb | Not Translated (0%) | In September, 1986, the United States considered an attempt to block foreign funding to Chile in the form of loans from the World Bank and the Inter-American Development Bank because of human rights abuses. | In September, 1986, the United States considered an attempt to block foreign funding to Chile in the form of loans from the World Bank and the Inter-American Development Bank because of human rights abuses. |
| 341972854960-dcbd-4cb8-93a1-85304bfb53eb | Not Translated (0%) | At this time, Chile was governed by the dictator Augusto Pinochet. | At this time, Chile was governed by the dictator Augusto Pinochet. |
| 342072854960-dcbd-4cb8-93a1-85304bfb53eb | Not Translated (0%) | Pinochet used torture and murder to eliminate political opposition while embezzling and using government funds for personal use. | Pinochet used torture and murder to eliminate political opposition while embezzling and using government funds for personal use. |
| 3421442a4ce2-66d5-4a4c-ac73-021fdfe41260 | Not Translated (0%) | Less than two decades later, on Friday, July 16, 2004, Riggs Bank, which provided banking services to Pinochet, was acquired by PNC Financial Services. | Less than two decades later, on Friday, July 16, 2004, Riggs Bank, which provided banking services to Pinochet, was acquired by PNC Financial Services. |
| 3422442a4ce2-66d5-4a4c-ac73-021fdfe41260 | Not Translated (0%) | Prior to being acquired, Riggs Bank had existed for more than 100 years. | Prior to being acquired, Riggs Bank had existed for more than 100 years. |
| 3423442a4ce2-66d5-4a4c-ac73-021fdfe41260 | Not Translated (0%) | It was the primary bank in the US capital of Washington, D.C., and had provided banking to more than 20 US presidents, including Abraham Lincoln. | It was the primary bank in the US capital of Washington, D.C., and had provided banking to more than 20 US presidents, including Abraham Lincoln. |
| 3424442a4ce2-66d5-4a4c-ac73-021fdfe41260 | Not Translated (0%) | However, in 1994, officials from Riggs Bank traveled to Chile and offered their banking services to General Pinochet. | However, in 1994, officials from Riggs Bank traveled to Chile and offered their banking services to General Pinochet. |
| 3425442a4ce2-66d5-4a4c-ac73-021fdfe41260 | Not Translated (0%) | From 1994 to 2002, Riggs Bank continued its relationship, transferring millions of dollars on behalf of Pinochet. | From 1994 to 2002, Riggs Bank continued its relationship, transferring millions of dollars on behalf of Pinochet. |
| 3426442a4ce2-66d5-4a4c-ac73-021fdfe41260 | Not Translated (0%) | Upon discovery, US regulators investigated and fined Riggs Bank, and the bank ultimately never recovered from the reputational damage, leading to its eventual acquisition. | Upon discovery, US regulators investigated and fined Riggs Bank, and the bank ultimately never recovered from the reputational damage, leading to its eventual acquisition. |
| 342779fb2334-d077-45f3-b834-d3a1bf1f7bf9 | Not Translated (0%) | “At Riggs Bank, A Tangled Path Led to Scandal,” The New York Times, July 19, 2004. | “At Riggs Bank, A Tangled Path Led to Scandal,” The New York Times, July 19, 2004. |
| 342838314a28-df26-4f58-990d-8f0542060001 | Not Translated (0%) | , | , |
| 34296d8839a9-f80e-4695-b24e-17e2ccc3d138 | Not Translated (0%) | “Money Laundering and Foreign Corruption: | “Money Laundering and Foreign Corruption: |
| 34306d8839a9-f80e-4695-b24e-17e2ccc3d138 | Not Translated (0%) | Enforcement and Effectiveness of the Patriot Act: | Enforcement and Effectiveness of the Patriot Act: |
| 34316d8839a9-f80e-4695-b24e-17e2ccc3d138 | Not Translated (0%) | Case Study Involving Riggs Bank,” US Senate Permanent Subcommittee on Investigations, Committee on Governmental Affairs, July 15, 2004. | Case Study Involving Riggs Bank,” US Senate Permanent Subcommittee on Investigations, Committee on Governmental Affairs, July 15, 2004. |
| 3432d94a3e8d-4809-45d4-be4b-c48036f89363 | Not Translated (0%) | , | , |
| 34331462497b-5955-44a3-8535-bbd262d1853e | Not Translated (0%) | “Sanctions Issue Splits Chileans,” The Washington Post, September 22, 1986. | “Sanctions Issue Splits Chileans,” The Washington Post, September 22, 1986. |
| 343461d0f763-686b-45ab-82ac-3ba8dfcab620 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 34358b8f2cb7-4008-425a-8e88-1f16777b2d11 | Not Translated (0%) | Banks need to continually monitor the political climate of countries subject to a sanctions regime for potential changes in the regime. | Banks need to continually monitor the political climate of countries subject to a sanctions regime for potential changes in the regime. |
| 3436e302a0c2-3e86-4406-9df8-e95d9bbd5f55 | Not Translated (0%) | Wealth management, with its profit incentives, is a high-risk industry that is often international in nature. | Wealth management, with its profit incentives, is a high-risk industry that is often international in nature. |
| 3437275d8fb7-aba4-4570-ab8b-1dd54e3e09b1 | Not Translated (0%) | Firms should understand the source of funds and wealth of their wealth management clients. | Firms should understand the source of funds and wealth of their wealth management clients. |
| 34383309fc77-edb9-42c9-b8c7-b1cbd40c991e | Not Translated (0%) | In addition to sanctions liability, firms should consider the reputational risk from providing services to persons and entities that are considered for sanctions or are engaged in activity which fall within the purpose of sanctions. | In addition to sanctions liability, firms should consider the reputational risk from providing services to persons and entities that are considered for sanctions or are engaged in activity which fall within the purpose of sanctions. |
| 34393309fc77-edb9-42c9-b8c7-b1cbd40c991e | Not Translated (0%) | A risk by association could develop into a more direct risk and needs to be managed accordingly. | A risk by association could develop into a more direct risk and needs to be managed accordingly. |
| 344044b2bda3-a119-4225-96e3-05cb24a5ae31 | Not Translated (0%) | COMMERCIAL AND INVESTMENT BANKING | COMMERCIAL AND INVESTMENT BANKING |
| 344181e7dd28-57f0-4a9c-a26c-bdf0800c0fa9 | Not Translated (0%) | The commercial and investment banking lines pose similar sanctions risks as those for wealth management and private banking. | The commercial and investment banking lines pose similar sanctions risks as those for wealth management and private banking. |
| 344211467afc-3495-4cfc-be1d-30fc8afa6a0e | Not Translated (0%) | Customers are likely to use or involve complex ownership structures, and it can be difficult to identify the owners and controllers. | Customers are likely to use or involve complex ownership structures, and it can be difficult to identify the owners and controllers. |
| 344311467afc-3495-4cfc-be1d-30fc8afa6a0e | Not Translated (0%) | It’s critical to obtain sufficient information about the structures to ensure the customer does not have a beneficial owner who is a sanctions target and determine that none of the entities involved are captured by the EU or US beneficial ownership rules. | It’s critical to obtain sufficient information about the structures to ensure the customer does not have a beneficial owner who is a sanctions target and determine that none of the entities involved are captured by the EU or US beneficial ownership rules. |
| 344411467afc-3495-4cfc-be1d-30fc8afa6a0e | Not Translated (0%) | Customers in commercial and investment banking tend to use intermediaries. | Customers in commercial and investment banking tend to use intermediaries. |
| 344543f334fc-04bd-4c79-8709-83459e99935d | Not Translated (0%) | With regard to the nature of business, an organization should investigate how the customer undertakes SDD on its own customers, counterparties, intermediaries, suppliers, and end users. | With regard to the nature of business, an organization should investigate how the customer undertakes SDD on its own customers, counterparties, intermediaries, suppliers, and end users. |
| 344643f334fc-04bd-4c79-8709-83459e99935d | Not Translated (0%) | It should also determine what industry the customer is in, as well as their actual and expected counterparties. | It should also determine what industry the customer is in, as well as their actual and expected counterparties. |
| 344743f334fc-04bd-4c79-8709-83459e99935d | Not Translated (0%) | Certain industries and sectors—such as companies that deal in arms, natural resources, and goods that could have dual uses—are more prone to sanctions violations than others. | Certain industries and sectors—such as companies that deal in arms, natural resources, and goods that could have dual uses—are more prone to sanctions violations than others. |
| 344843f334fc-04bd-4c79-8709-83459e99935d | Not Translated (0%) | A firm should look at debt and equity financing to ensure the customer is not restricted under Russian sectoral or Venezuelan sanctions. | A firm should look at debt and equity financing to ensure the customer is not restricted under Russian sectoral or Venezuelan sanctions. |
| 3449221a04ee-f330-4377-b425-6e91a0cd5317 | Not Translated (0%) | When examining jurisdiction/geography, tax residency is a complicating factor, given the customer’s complex structure. | When examining jurisdiction/geography, tax residency is a complicating factor, given the customer’s complex structure. |
| 3450221a04ee-f330-4377-b425-6e91a0cd5317 | Not Translated (0%) | It is important to examine the location of operations and counterparties and the geographic reach of transactions. | It is important to examine the location of operations and counterparties and the geographic reach of transactions. |
| 3451b91e14bd-e657-4d56-abaa-6effffb8e282 | Not Translated (0%) | The following questions can be used to clarify the extent of a customer’s “geographic footprint”: | The following questions can be used to clarify the extent of a customer’s “geographic footprint”: |
| 34525f0c76a0-0ec8-474d-aa68-d4501f6ab0f0 | Not Translated (0%) | What products and services with cross-border features does the customer have access to (e.g., a USD account or an investment in USD securities)? | What products and services with cross-border features does the customer have access to (e.g., a USD account or an investment in USD securities)? |
| 345328521947-cb99-4e28-b92c-60367fa9b4ca | Not Translated (0%) | How will funds linked to sanctions exposure be segregated? | How will funds linked to sanctions exposure be segregated? |
| 3454ed90f83e-9faf-4cf5-9511-5934909aa006 | Not Translated (0%) | Will funds from banks related to sanctions exposure pass through the institution? | Will funds from banks related to sanctions exposure pass through the institution? |
| 3455c908e1e4-76ea-427f-a71f-753c5e27fed7 | Not Translated (0%) | What are the existing agreements, intermediaries, advisors, and banks engaged in the customer’s transactions? | What are the existing agreements, intermediaries, advisors, and banks engaged in the customer’s transactions? |
| 34562980ff4d-ee46-4802-aa43-8a9323f96b0e | Not Translated (0%) | Are additional controls needed (e.g., adding names of distributors to the list for screening)? | Are additional controls needed (e.g., adding names of distributors to the list for screening)? |
| 345757cd1c5a-5bcc-4313-bff7-d506bdf2cf18 | Not Translated (0%) | The financing of debt and equity are important considerations when handling the investment products business line. | The financing of debt and equity are important considerations when handling the investment products business line. |
| 345857cd1c5a-5bcc-4313-bff7-d506bdf2cf18 | Not Translated (0%) | Consider the fact that sanctions imposed on Russia, Ukraine, and Venezuela prohibit sectoral sanctions identifications (SSIs) from raising finances directly or indirectly through the issuance of new debt or new equity. | Consider the fact that sanctions imposed on Russia, Ukraine, and Venezuela prohibit sectoral sanctions identifications (SSIs) from raising finances directly or indirectly through the issuance of new debt or new equity. |
| 345957cd1c5a-5bcc-4313-bff7-d506bdf2cf18 | Not Translated (0%) | As part of SDD, an organization needs to consider whether a proposed transaction has been structured to allow an SSI to circumvent the sanctions restrictions. | As part of SDD, an organization needs to consider whether a proposed transaction has been structured to allow an SSI to circumvent the sanctions restrictions. |
| 346057cd1c5a-5bcc-4313-bff7-d506bdf2cf18 | Not Translated (0%) | And it is important to remember the beneficial owner aggregate rule, which also applies in this situation. | And it is important to remember the beneficial owner aggregate rule, which also applies in this situation. |
| 34615f4e0b75-642b-4ca2-a3bf-a0c8045cd5a9 | Not Translated (0%) | Review the example shown in <7903/>. | Review the example shown in <7903/>. |
| 34625f4e0b75-642b-4ca2-a3bf-a0c8045cd5a9 | Not Translated (0%) | Entity X owns 55% of Entity A. Entity A is also owned 45% by Entity Y. Entity X is designated as an SSI, but Entity Y is not. | Entity X owns 55% of Entity A. Entity A is also owned 45% by Entity Y. Entity X is designated as an SSI, but Entity Y is not. |
| 34635f4e0b75-642b-4ca2-a3bf-a0c8045cd5a9 | Not Translated (0%) | The Russian sectoral sanctions would still apply to Entity A. | The Russian sectoral sanctions would still apply to Entity A. |
| 3464257e9985-466f-4bee-98fe-4f1f1756d11d | Not Translated (0%) | SDD—Commercial Banking/Investments | SDD—Commercial Banking/Investments |
| 34656576c2da-6e9d-444b-9a40-bdaaf75a1456 | Not Translated (0%) | TRADE-RELATED ACTIVITY | TRADE-RELATED ACTIVITY |
| 34663c20df54-a2d6-4512-9cb8-df351ad1b681 | Not Translated (0%) | Financial institutions have a role in trade sanctions, particularly in preventing payments related to prohibited or restricted trade. | Financial institutions have a role in trade sanctions, particularly in preventing payments related to prohibited or restricted trade. |
| 34673c20df54-a2d6-4512-9cb8-df351ad1b681 | Not Translated (0%) | In some instances, trade is restricted for only certain listed individuals, as in the case of a sanction prohibiting the supply of luxury goods to North Korea. | In some instances, trade is restricted for only certain listed individuals, as in the case of a sanction prohibiting the supply of luxury goods to North Korea. |
| 34683c20df54-a2d6-4512-9cb8-df351ad1b681 | Not Translated (0%) | Often trade is restricted for a class of goods, such as those which might be used for non-peaceful purposes. | Often trade is restricted for a class of goods, such as those which might be used for non-peaceful purposes. |
| 34693c20df54-a2d6-4512-9cb8-df351ad1b681 | Not Translated (0%) | Those types of sanctions are more difficult to enforce, because they require detailed scrutiny and understanding of trade-related documentation and an understanding of sanctions exemptions and licensing. | Those types of sanctions are more difficult to enforce, because they require detailed scrutiny and understanding of trade-related documentation and an understanding of sanctions exemptions and licensing. |
| 347022c3c594-7429-4573-8854-f3c975915d00 | Not Translated (0%) | With regard to trade-related activity, when evaluating a customer’s nature of business, it is important to consider questions such as: | With regard to trade-related activity, when evaluating a customer’s nature of business, it is important to consider questions such as: |
| 3471a4bad09e-14c9-4467-a170-ee6cc519c0de | Not Translated (0%) | What intermediaries or brokers are involved? | What intermediaries or brokers are involved? |
| 34720898b7a8-3e22-4b69-b6ef-f8cfd0e480fe | Not Translated (0%) | Where are the intermediaries based? | Where are the intermediaries based? |
| 3473767cfab9-af65-4796-86a4-9123d1b1eb74 | Not Translated (0%) | Who is the end user? | Who is the end user? |
| 3474dad9e4c9-b6f6-4db1-ba0a-980e69234f3e | Not Translated (0%) | Are any of the parties sanctions targets or denied persons under the US Bureau of Industry and Security (BIS) list? | Are any of the parties sanctions targets or denied persons under the US Bureau of Industry and Security (BIS) list? |
| 3475cf20e877-8cb2-4f53-b4a6-6f7b7295ed3a | Not Translated (0%) | How will the product be used? | How will the product be used? |
| 3476b85b2077-41eb-481d-b508-ee1786844705 | Not Translated (0%) | What evidence can be provided regarding product use? | What evidence can be provided regarding product use? |
| 3477e47a1f2f-6cc5-4642-afed-9b7393c5375a | Not Translated (0%) | Is this use prohibited under an applicable sanction? | Is this use prohibited under an applicable sanction? |
| 34783eac389b-1e39-453c-95c8-add874dcf517 | Not Translated (0%) | What vessel will be used? | What vessel will be used? |
| 34799d4dac1c-41af-4de6-9ca8-f3438cd27ae6 | Not Translated (0%) | Who owns the vessel? | Who owns the vessel? |
| 3480fe9d4988-74b4-424a-9079-817b36acb5cd | Not Translated (0%) | To assess the customer’s jurisdiction/geography, an organization should determine the origin and destination of goods, as well as the methods and routes by which they will be shipped. | To assess the customer’s jurisdiction/geography, an organization should determine the origin and destination of goods, as well as the methods and routes by which they will be shipped. |
| 3481fe9d4988-74b4-424a-9079-817b36acb5cd | Not Translated (0%) | It should identify any jurisdictions through which the goods will be transshipped, including whether any of these locations are subject to sanctions restrictions. | It should identify any jurisdictions through which the goods will be transshipped, including whether any of these locations are subject to sanctions restrictions. |
| 3482fe9d4988-74b4-424a-9079-817b36acb5cd | Not Translated (0%) | Under what jurisdiction is the vessel flagged? | Under what jurisdiction is the vessel flagged? |
| 3483aa585196-9549-48b8-9e57-c9c86f96eac1 | Not Translated (0%) | The shipment method provides insight into risk. | The shipment method provides insight into risk. |
| 3484aa585196-9549-48b8-9e57-c9c86f96eac1 | Not Translated (0%) | It is well known that individuals who seek to evade sanctions exploit maritime shipping by trading goods at sea or by dropping goods at different ports. | It is well known that individuals who seek to evade sanctions exploit maritime shipping by trading goods at sea or by dropping goods at different ports. |
| 3485aa585196-9549-48b8-9e57-c9c86f96eac1 | Not Translated (0%) | Even overtly scheduled shipping routes may give rise to sanctions risks. | Even overtly scheduled shipping routes may give rise to sanctions risks. |
| 3486aa585196-9549-48b8-9e57-c9c86f96eac1 | Not Translated (0%) | Consider, for example, the risks posed by a stop at the Sevastopol commercial seaport in Crimea, given the international sanctions involved in that region. | Consider, for example, the risks posed by a stop at the Sevastopol commercial seaport in Crimea, given the international sanctions involved in that region. |
| 3487aa585196-9549-48b8-9e57-c9c86f96eac1 | Not Translated (0%) | Many of OFAC’s 2016 actions highlighted a common theme: the shipment of goods and the processing of payments to sanctioned jurisdictions through third-party countries that are not sanctioned. | Many of OFAC’s 2016 actions highlighted a common theme: the shipment of goods and the processing of payments to sanctioned jurisdictions through third-party countries that are not sanctioned. |
| 3488e71c9ad5-ee4b-4606-93c2-47401f913b46 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 3489e71c9ad5-ee4b-4606-93c2-47401f913b46 | Not Translated (0%) | DUTCH SHIPPING COMPANY, 2016 | DUTCH SHIPPING COMPANY, 2016 |
| 3490212ed286-8018-48dc-9a4e-61eea84487cb | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 34913beca9ba-b911-4180-a33f-8ca9553dcbb1 | Not Translated (0%) | In December 2016, a Dutch shipping company engaged a local logistics company, Company ABC, to ship wooden toys to Ukraine. | In December 2016, a Dutch shipping company engaged a local logistics company, Company ABC, to ship wooden toys to Ukraine. |
| 34923beca9ba-b911-4180-a33f-8ca9553dcbb1 | Not Translated (0%) | ABC was owned by a well-regarded French family that was not listed on any local or international sanctions lists. | ABC was owned by a well-regarded French family that was not listed on any local or international sanctions lists. |
| 34933beca9ba-b911-4180-a33f-8ca9553dcbb1 | Not Translated (0%) | It in turn engaged a subsidiary of the Russian Sovofrach Group, which had been sanctioned by the United States in 2016 and fined by OFAC. | It in turn engaged a subsidiary of the Russian Sovofrach Group, which had been sanctioned by the United States in 2016 and fined by OFAC. |
| 34943beca9ba-b911-4180-a33f-8ca9553dcbb1 | Not Translated (0%) | Company ABC’s bank received information about the Dutch shipping company used, but not the Russian subsidiary. | Company ABC’s bank received information about the Dutch shipping company used, but not the Russian subsidiary. |
| 34953beca9ba-b911-4180-a33f-8ca9553dcbb1 | Not Translated (0%) | This example shows how important it is to include all parties to the transactions in sanctions screening and customer due diligence processes. | This example shows how important it is to include all parties to the transactions in sanctions screening and customer due diligence processes. |
| 3496b97bcf5a-7323-4131-913c-b3233f6b2a3b | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 3497bd56f861-c51b-4a15-acdb-be09452e7ad0 | Not Translated (0%) | An organization should: | An organization should: |
| 349804267670-31fc-4c22-bfb4-4c50d13d2a18 | Not Translated (0%) | Assess whether a sanctions risk exposure might exist | Assess whether a sanctions risk exposure might exist |
| 34997850ac17-ad71-4c51-b70d-f176ce763780 | Not Translated (0%) | Collect all supporting information, including details of all parties to the transactions | Collect all supporting information, including details of all parties to the transactions |
| 35000d1cc2ab-bbf6-4684-920f-8dd224ee8b71 | Not Translated (0%) | Undertake due diligence on all parties | Undertake due diligence on all parties |
| 3501b2a4d148-ca7a-4690-854f-5bec254b4b37 | Not Translated (0%) | Double check whether any information is missing | Double check whether any information is missing |
| 3502893503f1-22bb-4aa0-bdda-e91f1fbfbd5e | Not Translated (0%) | Undertake additional research if necesssary | Undertake additional research if necesssary |
| 35037bdf3eac-11d4-40e9-9f65-c10020ecebe2 | Not Translated (0%) | Useful Documents | Useful Documents |
| 35044e5de36a-aeb0-468e-a602-057c8224c594 | Not Translated (0%) | The following types of shipping documents are useful for identifying key sanctions risks: | The following types of shipping documents are useful for identifying key sanctions risks: |
| 3505a1422492-a240-4d5c-999d-dc9428c7c833 | Not Translated (0%) | Bill of exchange: | Bill of exchange: |
| 3506a1422492-a240-4d5c-999d-dc9428c7c833 | Not Translated (0%) | This document is essentially the means by which exporters are paid for the goods that are to be shipped. | This document is essentially the means by which exporters are paid for the goods that are to be shipped. |
| 3507a1422492-a240-4d5c-999d-dc9428c7c833 | Not Translated (0%) | They include information such as the names of the exporter, importer, issuing bank, and the bank where the funds will be drawn. | They include information such as the names of the exporter, importer, issuing bank, and the bank where the funds will be drawn. |
| 3508310ee0f0-275f-4c34-8cdd-d379939439f6 | Not Translated (0%) | Commercial invoice: | Commercial invoice: |
| 3509310ee0f0-275f-4c34-8cdd-d379939439f6 | Not Translated (0%) | This document can provide information about the goods involved, including the quantity, the price, and the names of the seller and buyer. | This document can provide information about the goods involved, including the quantity, the price, and the names of the seller and buyer. |
| 35102d912e05-5486-4c26-9146-65120e6ba85e | Not Translated (0%) | End-user certificate: | End-user certificate: |
| 35112d912e05-5486-4c26-9146-65120e6ba85e | Not Translated (0%) | This is used to certify that the buyer is the final recipient of the materials and is not planning to transfer the materials to another party. | This is used to certify that the buyer is the final recipient of the materials and is not planning to transfer the materials to another party. |
| 3512791b8fae-0f59-45e3-a185-d6aa6f5f3ace | Not Translated (0%) | Packing list: | Packing list: |
| 3513791b8fae-0f59-45e3-a185-d6aa6f5f3ace | Not Translated (0%) | These documents are used when a variety of goods are transported in a single shipment and will list the contents separately. | These documents are used when a variety of goods are transported in a single shipment and will list the contents separately. |
| 3514950408fa-9f65-4ea7-b0e2-e13e3b3f9cc0 | Not Translated (0%) | Transport documents: | Transport documents: |
| 3515950408fa-9f65-4ea7-b0e2-e13e3b3f9cc0 | Not Translated (0%) | Documents such as bills of lading are an invaluable source of information for identifying possible jurisdiction SDD risks. | Documents such as bills of lading are an invaluable source of information for identifying possible jurisdiction SDD risks. |
| 3516950408fa-9f65-4ea7-b0e2-e13e3b3f9cc0 | Not Translated (0%) | A bill of lading identifies the means of transport, information about the goods, points of loading, transshipment points, final unloading destination, and the date on which the goods are to be shipped. | A bill of lading identifies the means of transport, information about the goods, points of loading, transshipment points, final unloading destination, and the date on which the goods are to be shipped. |
| 3517aad89d83-701e-4b1e-8a48-5ad4bebf6e2e | Not Translated (0%) | Other helpful documents and key information include insurance policies, certificates of origin, railway consignment notes, airway bills, vessel numbers and flags, and container numbers. | Other helpful documents and key information include insurance policies, certificates of origin, railway consignment notes, airway bills, vessel numbers and flags, and container numbers. |
| 3518c0ed9490-9abc-486e-950e-271e9be863a8 | Not Translated (0%) | Free Trade Zones/Special Economic Zones | Free Trade Zones/Special Economic Zones |
| 3519f00a432b-2137-4773-98e4-c812830244cb | Not Translated (0%) | A key risk area related to jurisdiction/geography and specific to trade-related activities is the Free Trade Zone (FTZ). | A key risk area related to jurisdiction/geography and specific to trade-related activities is the Free Trade Zone (FTZ). |
| 3520f00a432b-2137-4773-98e4-c812830244cb | Not Translated (0%) | FTZs, also known as Special Economic Zones (SEZs), have evolved into various forms and often are referred to by different names in different countries. | FTZs, also known as Special Economic Zones (SEZs), have evolved into various forms and often are referred to by different names in different countries. |
| 3521f00a432b-2137-4773-98e4-c812830244cb | Not Translated (0%) | A general definition of a FTZ is a delimited geographic area within a country with a zone management that provides infrastructure and services to tenant companies, and in which the rules for doing business are different and are promoted by a set of policy instruments that are not generally applicable to the rest of the country. | A general definition of a FTZ is a delimited geographic area within a country with a zone management that provides infrastructure and services to tenant companies, and in which the rules for doing business are different and are promoted by a set of policy instruments that are not generally applicable to the rest of the country. |
| 3522f00a432b-2137-4773-98e4-c812830244cb | Not Translated (0%) | The first modern zone is said to have been established in the Navy Yard in Brooklyn, New York, in 1937. | The first modern zone is said to have been established in the Navy Yard in Brooklyn, New York, in 1937. |
| 3523f00a432b-2137-4773-98e4-c812830244cb | Not Translated (0%) | The first European Zone, the Shannon Free Zone in Ireland, was established in 1959 by the Irish government to repurpose the Shannon International Airport. | The first European Zone, the Shannon Free Zone in Ireland, was established in 1959 by the Irish government to repurpose the Shannon International Airport. |
| 3524f00a432b-2137-4773-98e4-c812830244cb | Not Translated (0%) | With more than 4,000 free trade zones in more than 135 countries, FTZs play an integral role in international trade. | With more than 4,000 free trade zones in more than 135 countries, FTZs play an integral role in international trade. |
| 3525f00a432b-2137-4773-98e4-c812830244cb | Not Translated (0%) | Other examples include Gibraltar (1704); Singapore (1819); Hong Kong, China (1848); Hamburg, Germany (1888); and Copenhagen, Denmark (1891). | Other examples include Gibraltar (1704); Singapore (1819); Hong Kong, China (1848); Hamburg, Germany (1888); and Copenhagen, Denmark (1891). |
| 3526d1d01505-fa71-4f8e-ad72-16b3f2300c6f | Not Translated (0%) | Free trade zones have special regulatory and tax treatments for certain trade-related goods and services. | Free trade zones have special regulatory and tax treatments for certain trade-related goods and services. |
| 3527d1d01505-fa71-4f8e-ad72-16b3f2300c6f | Not Translated (0%) | FTZs are located in developing countries near ports of entry, but are separate from traditional ports of entry and typically operate under different rules. | FTZs are located in developing countries near ports of entry, but are separate from traditional ports of entry and typically operate under different rules. |
| 3528d1d01505-fa71-4f8e-ad72-16b3f2300c6f | Not Translated (0%) | In addition, FTZs are located in regional financial centers that link international trade hubs with access to global financial markets. | In addition, FTZs are located in regional financial centers that link international trade hubs with access to global financial markets. |
| 3529d1d01505-fa71-4f8e-ad72-16b3f2300c6f | Not Translated (0%) | Examples of FTZs are the Colón Free Trade Zone in Panama and the Shanghai Free Trade Zone (officially the China Pilot Free Trade Zone) in China. | Examples of FTZs are the Colón Free Trade Zone in Panama and the Shanghai Free Trade Zone (officially the China Pilot Free Trade Zone) in China. |
| 353021d67539-e6bd-4a9f-917b-d9e82399a08d | Not Translated (0%) | FTZs commonly have inadequate sanctions safeguards; minimal oversight by local authorities; weak procedures to inspect goods and legal entities, including appropriate record-keeping and information technology systems; and lack of cooperation between the FTZ and the local customs authorities. | FTZs commonly have inadequate sanctions safeguards; minimal oversight by local authorities; weak procedures to inspect goods and legal entities, including appropriate record-keeping and information technology systems; and lack of cooperation between the FTZ and the local customs authorities. |
| 35311d8a22fd-aa18-4d84-8f79-edf030ebebb9 | Not Translated (0%) | FTZs can offer several geographic advantages and incentives to foreign traders, including tax exemptions, separate company formation services that require little or no ownership information, and less regulatory scrutiny because they are not typically subject to the usual customs controls. | FTZs can offer several geographic advantages and incentives to foreign traders, including tax exemptions, separate company formation services that require little or no ownership information, and less regulatory scrutiny because they are not typically subject to the usual customs controls. |
| 3532054581cb-40b7-46df-ab86-7b6a3102fe4e | Not Translated (0%) | For example, the Jebel Ali Free Zone in Dubai is the world’s largest FTZ. | For example, the Jebel Ali Free Zone in Dubai is the world’s largest FTZ. |
| 3533054581cb-40b7-46df-ab86-7b6a3102fe4e | Not Translated (0%) | It is especially attractive as a shipping port to Iranian entities because the local regulations do not require that local partners own a majority or percentage of the company. | It is especially attractive as a shipping port to Iranian entities because the local regulations do not require that local partners own a majority or percentage of the company. |
| 3534584edc2b-5c63-4293-a44c-b483107564ce | Not Translated (0%) | Sanctions targets can misuse FTZs to circumvent sanctions by using them to conceal the ultimate destination of goods and hide the true beneficial owners of the companies involved. | Sanctions targets can misuse FTZs to circumvent sanctions by using them to conceal the ultimate destination of goods and hide the true beneficial owners of the companies involved. |
| 3535584edc2b-5c63-4293-a44c-b483107564ce | Not Translated (0%) | For this reason, if FTZs are a part of the planned shipping arrangements, it’s critical to understand the reason for stopping at or transferring goods at them. | For this reason, if FTZs are a part of the planned shipping arrangements, it’s critical to understand the reason for stopping at or transferring goods at them. |
| 3536584edc2b-5c63-4293-a44c-b483107564ce | Not Translated (0%) | This includes obtaining information about the owners and controllers of any companies formed in an FTZ that are acting as the recipient or sender of goods. | This includes obtaining information about the owners and controllers of any companies formed in an FTZ that are acting as the recipient or sender of goods. |
| 3537aae08b83-46a7-4f53-8dc2-1d2a9b2091ea | Not Translated (0%) | Transshipment | Transshipment |
| 35384ee38d32-f161-4964-b74c-e6fcb9b69803 | Not Translated (0%) | Another jurisdiction risk of trade-related activities is transshipment, which involves the shipment of goods through an intermediate destination in order to reach the final destination. | Another jurisdiction risk of trade-related activities is transshipment, which involves the shipment of goods through an intermediate destination in order to reach the final destination. |
| 35394ee38d32-f161-4964-b74c-e6fcb9b69803 | Not Translated (0%) | Transshipment routes are generally determined by third-party shipping and logistics companies, based on the most economical or efficient means of delivering cargo. | Transshipment routes are generally determined by third-party shipping and logistics companies, based on the most economical or efficient means of delivering cargo. |
| 35404ee38d32-f161-4964-b74c-e6fcb9b69803 | Not Translated (0%) | Therefore, it is important to review transport documents that show the movement of goods and ask customers to verify whether their shipments will stop in any sanctioned countries or their ports. | Therefore, it is important to review transport documents that show the movement of goods and ask customers to verify whether their shipments will stop in any sanctioned countries or their ports. |
| 35414ee38d32-f161-4964-b74c-e6fcb9b69803 | Not Translated (0%) | An organization should attempt to confirm that goods were delivered in full to the destination country. | An organization should attempt to confirm that goods were delivered in full to the destination country. |
| 35424ee38d32-f161-4964-b74c-e6fcb9b69803 | Not Translated (0%) | The objective is to confirm that no goods left the port area or cleared customs if the transport route included a stop in a sanctioned country. | The objective is to confirm that no goods left the port area or cleared customs if the transport route included a stop in a sanctioned country. |
| 3543545e6851-d3cb-44a7-a660-1514133f6116 | Not Translated (0%) | Trade Networks | Trade Networks |
| 3544485f29dc-529c-4bd6-b224-fc2d789407e8 | Not Translated (0%) | Trade networks pose another specific sanctions risk in trade-related activities. | Trade networks pose another specific sanctions risk in trade-related activities. |
| 3545485f29dc-529c-4bd6-b224-fc2d789407e8 | Not Translated (0%) | Trade networks are an efficient way of conducting trade because they use a variety of transport means. | Trade networks are an efficient way of conducting trade because they use a variety of transport means. |
| 3546485f29dc-529c-4bd6-b224-fc2d789407e8 | Not Translated (0%) | For example, train connections between Iran and eastern China could facilitate a rise in transshipment through Iran. | For example, train connections between Iran and eastern China could facilitate a rise in transshipment through Iran. |
| 3547485f29dc-529c-4bd6-b224-fc2d789407e8 | Not Translated (0%) | This connection might become more prominent in the context of the One Belt, One Road initiative. | This connection might become more prominent in the context of the One Belt, One Road initiative. |
| 3548485f29dc-529c-4bd6-b224-fc2d789407e8 | Not Translated (0%) | This ambitious initiative, also known as the New Silk Road, aims to open new markets for China’s consumer goods and excess industrial capacity. | This ambitious initiative, also known as the New Silk Road, aims to open new markets for China’s consumer goods and excess industrial capacity. |
| 354957ffc9a1-fc5b-499a-b1a5-f6c029dbd19b | Not Translated (0%) | “China’s Massive Belt and Road Initiative,” Council on Foreign Relations. | “China’s Massive Belt and Road Initiative,” Council on Foreign Relations. |
| 3550dab99f18-ebb6-467c-9b31-beaed6050000 | Not Translated (0%) | As part of SDD, an organization should assess whether a customer’s trade activity involves countries that share borders with sanctioned countries, and confirm that goods are delivered in full to non-sanctioned countries; that is, that there are no stops or customs clearance in sanctioned jurisdictions. | As part of SDD, an organization should assess whether a customer’s trade activity involves countries that share borders with sanctioned countries, and confirm that goods are delivered in full to non-sanctioned countries; that is, that there are no stops or customs clearance in sanctioned jurisdictions. |
| 3551e8f3157b-88cb-4c6c-b534-1e52d40b92e2 | Not Translated (0%) | CORRESPONDENT BANKING | CORRESPONDENT BANKING |
| 35527c4622cc-a75e-4fb4-8323-813f89ab31e3 | Not Translated (0%) | Correspondent banking is the provision of banking or business services by one bank (the correspondent bank) to another bank (the respondent bank). | Correspondent banking is the provision of banking or business services by one bank (the correspondent bank) to another bank (the respondent bank). |
| 35537c4622cc-a75e-4fb4-8323-813f89ab31e3 | Not Translated (0%) | By establishing multiple correspondent relationships globally, respondent banks can undertake international financial transactions for themselves and their customers in jurisdictions where they have no physical presence. | By establishing multiple correspondent relationships globally, respondent banks can undertake international financial transactions for themselves and their customers in jurisdictions where they have no physical presence. |
| 35547c4622cc-a75e-4fb4-8323-813f89ab31e3 | Not Translated (0%) | Large international banks typically act as correspondents for thousands of other banks around the world. | Large international banks typically act as correspondents for thousands of other banks around the world. |
| 35558cfa2da9-98eb-41e1-954b-48755356203f | Not Translated (0%) | A correspondent bank is effectively acting as its respondent’s agent or conduit, executing and/or processing payments or other transactions for the respondent’s customers. | A correspondent bank is effectively acting as its respondent’s agent or conduit, executing and/or processing payments or other transactions for the respondent’s customers. |
| 35568cfa2da9-98eb-41e1-954b-48755356203f | Not Translated (0%) | These customers may be individuals, legal entities, or even other financial institutions. | These customers may be individuals, legal entities, or even other financial institutions. |
| 35574bfa6121-d5a1-44bb-ae83-fa071975f937 | Not Translated (0%) | The Wolfsberg Group. | The Wolfsberg Group. |
| 35584bfa6121-d5a1-44bb-ae83-fa071975f937 | Not Translated (0%) | Wolfsberg Anti-Money Laundering Principles for Correspondent Banking. | Wolfsberg Anti-Money Laundering Principles for Correspondent Banking. |
| 3559c934f74d-32a8-4249-821d-f6040cf48945 | Not Translated (0%) | Respondent banks are banks that access international markets by maintaining an account with a larger bank with an international presence or reach. | Respondent banks are banks that access international markets by maintaining an account with a larger bank with an international presence or reach. |
| 3560c934f74d-32a8-4249-821d-f6040cf48945 | Not Translated (0%) | Through the relationship, the respondent bank obtains a wide range of services for itself or its customers that it otherwise did not have or could not offer. | Through the relationship, the respondent bank obtains a wide range of services for itself or its customers that it otherwise did not have or could not offer. |
| 3561c934f74d-32a8-4249-821d-f6040cf48945 | Not Translated (0%) | Through correspondent banking relationships, respondent banks can receive services, including cash management (e.g., interest-bearing accounts in a variety of currencies), international wire transfers of funds, check clearing, payable-through accounts, and foreign exchange services. | Through correspondent banking relationships, respondent banks can receive services, including cash management (e.g., interest-bearing accounts in a variety of currencies), international wire transfers of funds, check clearing, payable-through accounts, and foreign exchange services. |
| 35626699714e-f45c-4b7e-a125-89b1929590dd | Not Translated (0%) | Before establishing correspondent accounts, banks should be able to answer basic questions about the respondent bank, including who its owners are and what the nature of its regulatory oversight is. | Before establishing correspondent accounts, banks should be able to answer basic questions about the respondent bank, including who its owners are and what the nature of its regulatory oversight is. |
| 356384ae1b7c-0554-44ce-8d54-82c3d0ac7a69 | Not Translated (0%) | If a financial institution offers correspondent banking to other firms (e.g., a correspondent bank, fund manager, broker, custodian, etc.), the sanctions risks are potentially higher and more difficult to identify than for other lines of business. | If a financial institution offers correspondent banking to other firms (e.g., a correspondent bank, fund manager, broker, custodian, etc.), the sanctions risks are potentially higher and more difficult to identify than for other lines of business. |
| 356484ae1b7c-0554-44ce-8d54-82c3d0ac7a69 | Not Translated (0%) | By their nature, correspondent banking relationships create a situation in which a financial institution carries out financial transactions on behalf of customers of another institution. | By their nature, correspondent banking relationships create a situation in which a financial institution carries out financial transactions on behalf of customers of another institution. |
| 356584ae1b7c-0554-44ce-8d54-82c3d0ac7a69 | Not Translated (0%) | This indirect relationship means that the correspondent bank provides services for individuals or entities for which it has neither verified the identities nor obtained any firsthand knowledge. | This indirect relationship means that the correspondent bank provides services for individuals or entities for which it has neither verified the identities nor obtained any firsthand knowledge. |
| 356689fd3af8-ad9c-4441-8623-0c800a54bd2f | Not Translated (0%) | When evaluating sanctions exposure for a correspondent bank relationship, financial institutions must at the very least apply the same stringent rules to the correspondent bank that would be considered appropriate for their own financial institution. | When evaluating sanctions exposure for a correspondent bank relationship, financial institutions must at the very least apply the same stringent rules to the correspondent bank that would be considered appropriate for their own financial institution. |
| 3567f498f6a4-0df8-4a7b-a58e-6e0e177182e7 | Not Translated (0%) | Because correspondent banking is a specialized area, the Wolfsberg Group developed a specialized questionnaire to collect both KYC and SDD information. | Because correspondent banking is a specialized area, the Wolfsberg Group developed a specialized questionnaire to collect both KYC and SDD information. |
| 3568f498f6a4-0df8-4a7b-a58e-6e0e177182e7 | Not Translated (0%) | There are several more notable risk areas that should be considered as part of SDD when dealing with correspondent banking. | There are several more notable risk areas that should be considered as part of SDD when dealing with correspondent banking. |
| 3569f4264f48-b453-4731-b169-82cd9a520c64 | Not Translated (0%) | When evaluating customer risk, an organization must determine: | When evaluating customer risk, an organization must determine: |
| 35706d74b068-ad50-4813-88e9-dc03b5cac40c | Not Translated (0%) | The parent company and its branches and equivalents | The parent company and its branches and equivalents |
| 3571de83a9cf-5e47-41f4-8601-1f85dae7ad64 | Not Translated (0%) | The executive committee, or equivalent, and the supervisory board | The executive committee, or equivalent, and the supervisory board |
| 3572209cecdb-551f-46d9-a259-2b2089405d9e | Not Translated (0%) | Any other significant controlling interests and their ultimate beneficial owners | Any other significant controlling interests and their ultimate beneficial owners |
| 35738299de4f-87f6-4488-b6aa-2d77e9b20ee1 | Not Translated (0%) | The geographic regions in which their customer base is located | The geographic regions in which their customer base is located |
| 357426d61bbf-e539-4e58-a87d-ad74f861fda8 | Not Translated (0%) | Key factors related to the customer’s nature of business include where it is licensed, the status of its license, and the maturity of regulation and enforcement in their jurisdiction. | Key factors related to the customer’s nature of business include where it is licensed, the status of its license, and the maturity of regulation and enforcement in their jurisdiction. |
| 357526d61bbf-e539-4e58-a87d-ad74f861fda8 | Not Translated (0%) | The expected business activity should be monitored against actual activity to identify any inconsistencies. | The expected business activity should be monitored against actual activity to identify any inconsistencies. |
| 35769fb5887d-8ed3-4fe6-a5b7-adcfb7a53474 | Not Translated (0%) | Consider downstream activities and the risk of nested accounts (nesting). | Consider downstream activities and the risk of nested accounts (nesting). |
| 35779fb5887d-8ed3-4fe6-a5b7-adcfb7a53474 | Not Translated (0%) | Nested accounts can pose an elevated sanctions risk because they are one step removed from the underlying originator/ beneficiary. | Nested accounts can pose an elevated sanctions risk because they are one step removed from the underlying originator/ beneficiary. |
| 35789fb5887d-8ed3-4fe6-a5b7-adcfb7a53474 | Not Translated (0%) | (This is why it is important for a correspondent bank and any affiliates to demonstrate that they can apply effective controls to their downstream correspondent banking customers.) | (This is why it is important for a correspondent bank and any affiliates to demonstrate that they can apply effective controls to their downstream correspondent banking customers.) |
| 35799fb5887d-8ed3-4fe6-a5b7-adcfb7a53474 | Not Translated (0%) | An organization should determine the license status and the existence of payable-through accounts. | An organization should determine the license status and the existence of payable-through accounts. |
| 3580b84e76d8-7408-45bc-8add-69f4a167cce0 | Not Translated (0%) | Assessing the adequacy of a correspondent relationship’s sanctions compliance program involves first conducting research to determine if the institution was previously the subject of a sanctions violation. | Assessing the adequacy of a correspondent relationship’s sanctions compliance program involves first conducting research to determine if the institution was previously the subject of a sanctions violation. |
| 3581b84e76d8-7408-45bc-8add-69f4a167cce0 | Not Translated (0%) | This information can be found in open sources and through inquiries with their regulator. | This information can be found in open sources and through inquiries with their regulator. |
| 3582b84e76d8-7408-45bc-8add-69f4a167cce0 | Not Translated (0%) | It is also possible to ask for audit reports, both internal and external, which evaluate the effectiveness of their sanctions program. | It is also possible to ask for audit reports, both internal and external, which evaluate the effectiveness of their sanctions program. |
| 3583b84e76d8-7408-45bc-8add-69f4a167cce0 | Not Translated (0%) | Those reports may shed light on weaknesses that could increase the probability of a sanctions violation in the future. | Those reports may shed light on weaknesses that could increase the probability of a sanctions violation in the future. |
| 3584f47c1d5f-f406-4d21-a4a1-2a7a356685f1 | Not Translated (0%) | When examining jurisdiction/geography, it is important to keep in mind that entities that are located in countries subject to sanctions (e.g., North Korea) can facilitate transactions by setting up shell entities in other jurisdictions, such as in the United Arab Emirates or Turkey. | When examining jurisdiction/geography, it is important to keep in mind that entities that are located in countries subject to sanctions (e.g., North Korea) can facilitate transactions by setting up shell entities in other jurisdictions, such as in the United Arab Emirates or Turkey. |
| 3585f47c1d5f-f406-4d21-a4a1-2a7a356685f1 | Not Translated (0%) | A correspondent banking relationship can be used between these shell entities and a domestic bank in order to access the financial system through their intermediary shell company in a country that does not have restrictions. | A correspondent banking relationship can be used between these shell entities and a domestic bank in order to access the financial system through their intermediary shell company in a country that does not have restrictions. |
| 35860f108a5a-717d-4479-b128-c9ed149d33e7 | Not Translated (0%) | A customer may not be a sanctioned individual, but he or she may be linked to a business that is then linked to a sanctioned individual. | A customer may not be a sanctioned individual, but he or she may be linked to a business that is then linked to a sanctioned individual. |
| 35870f108a5a-717d-4479-b128-c9ed149d33e7 | Not Translated (0%) | An organization needs to identify and assess that risk; therefore, after it first checks the customer, it should perform a second check later on any entities (e.g., a sanctioned bank) and individuals identified during SDD research. | An organization needs to identify and assess that risk; therefore, after it first checks the customer, it should perform a second check later on any entities (e.g., a sanctioned bank) and individuals identified during SDD research. |
| 35880d9cb56c-ec01-4864-815a-4df929b129f7 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 35890d9cb56c-ec01-4864-815a-4df929b129f7 | Not Translated (0%) | NORTH KOREA FRONT COMPANIES, 2016 | NORTH KOREA FRONT COMPANIES, 2016 |
| 3590e41cd47b-0b87-4d0b-bebd-f1d8bb0922a0 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 35919a49ceb5-d0f7-4afa-a732-c8d19812ba8a | Not Translated (0%) | In September 2016, the US Department of Justice filed criminal charges against Ma Xiaohong, majority owner of the Dandong Hongxiang Industrial Development Company (DHID), an industrial machinery and equipment wholesaler in China, and several associates, for working on behalf of a sanctioned North Korean bank (Korea Kwangson Banking Corp) to evade US sanctions. | In September 2016, the US Department of Justice filed criminal charges against Ma Xiaohong, majority owner of the Dandong Hongxiang Industrial Development Company (DHID), an industrial machinery and equipment wholesaler in China, and several associates, for working on behalf of a sanctioned North Korean bank (Korea Kwangson Banking Corp) to evade US sanctions. |
| 359201491dec-46d4-4a39-a698-142dd38876a4 | Not Translated (0%) | According to the criminal complaint, DHID used at least 22 different front companies, spanning from the British Virgin Islands to Hong Kong to England, to engage in US dollar transactions. | According to the criminal complaint, DHID used at least 22 different front companies, spanning from the British Virgin Islands to Hong Kong to England, to engage in US dollar transactions. |
| 359301491dec-46d4-4a39-a698-142dd38876a4 | Not Translated (0%) | Names of front companies ranged from “Go Tech Investment Ltd.” in the Seychelles to “Blue Sea Business Co. Ltd.” in Wales. | Names of front companies ranged from “Go Tech Investment Ltd.” in the Seychelles to “Blue Sea Business Co. Ltd.” in Wales. |
| 359401491dec-46d4-4a39-a698-142dd38876a4 | Not Translated (0%) | The location of Blue Sea appeared to be a nondescript walk-up apartment with no signage and no exterior number, and, according to public database information, was the incorporation address for many other companies. | The location of Blue Sea appeared to be a nondescript walk-up apartment with no signage and no exterior number, and, according to public database information, was the incorporation address for many other companies. |
| 3595857e442c-4e47-4743-a415-14b03f2337f5 | Not Translated (0%) | All in all, the justice department said that DHID’s illicit network consisted of 43 total business entities across four continents. | All in all, the justice department said that DHID’s illicit network consisted of 43 total business entities across four continents. |
| 3596857e442c-4e47-4743-a415-14b03f2337f5 | Not Translated (0%) | Ma has since disappeared. | Ma has since disappeared. |
| 35973fff8ba7-86ba-40b7-b055-1d8cc4aecb8c | Not Translated (0%) | “How North Korea Uses Front Companies to Help Evade Sanctions,” Frontline, October 3, 2017. | “How North Korea Uses Front Companies to Help Evade Sanctions,” Frontline, October 3, 2017. |
| 359881002daa-0d1a-4085-8f0f-1af29f4388f8 | Not Translated (0%) | , | , |
| 35995204301e-c288-4b45-9c3b-3834ce8ea6e6 | Not Translated (0%) | “US charges four Chinese, firm with aiding Pyongyang’s nuclear program,” The Washington Post, September 26, 2016. | “US charges four Chinese, firm with aiding Pyongyang’s nuclear program,” The Washington Post, September 26, 2016. |
| 3600d5312f8f-dc45-4939-ad81-6a707ec60e75 | Not Translated (0%) | KEY TAKEAWAYS: | KEY TAKEAWAYS: |
| 36010fe6156b-95db-465f-bf83-1820914ab3cc | Not Translated (0%) | An organization must undertake sufficient due diligence to be able to identify and confirm the UBO of customers and any other relevant entities linked to the UBO in relation to any transactions. | An organization must undertake sufficient due diligence to be able to identify and confirm the UBO of customers and any other relevant entities linked to the UBO in relation to any transactions. |
| 3602b72add13-c7f1-4b00-8c6a-896d63c7b2dc | Not Translated (0%) | Related account parties are additional key members of the customer’s organizational structure and key entities to the customer’s activity, such as with third-party guarantors to a transaction; as such, they need to be included in the SDD research model. | Related account parties are additional key members of the customer’s organizational structure and key entities to the customer’s activity, such as with third-party guarantors to a transaction; as such, they need to be included in the SDD research model. |
| 36036662169a-423a-4771-a3c1-04b28ed084c8 | Not Translated (0%) | Geographic risk must always be assessed. | Geographic risk must always be assessed. |
| 36046662169a-423a-4771-a3c1-04b28ed084c8 | Not Translated (0%) | A customer whose major suppliers, purchasers, shipping paths, etc., are all located in low-risk jurisdictions will be lower risk from a sanctions perspective than a customer whose suppliers are in high-risk jurisdictions, whose goods go through high-risk jurisdictions or free-trade zones, and who otherwise conducts activity with other entities in high-risk jurisdictions. | A customer whose major suppliers, purchasers, shipping paths, etc., are all located in low-risk jurisdictions will be lower risk from a sanctions perspective than a customer whose suppliers are in high-risk jurisdictions, whose goods go through high-risk jurisdictions or free-trade zones, and who otherwise conducts activity with other entities in high-risk jurisdictions. |
| 3605cf377cb3-4771-4b86-94a0-34369579d5bb | Not Translated (0%) | INSURANCE | INSURANCE |
| 36066c36969f-8d77-422c-820e-529fca2c96a7 | Not Translated (0%) | Some sanctions include restrictions on the provision of insurance, brokering, and advisory services. | Some sanctions include restrictions on the provision of insurance, brokering, and advisory services. |
| 36076c36969f-8d77-422c-820e-529fca2c96a7 | Not Translated (0%) | Depending on how an institution organizes its service offerings, these activities might reside in their own lines of business or under another business line. | Depending on how an institution organizes its service offerings, these activities might reside in their own lines of business or under another business line. |
| 36086c36969f-8d77-422c-820e-529fca2c96a7 | Not Translated (0%) | This discussion refers to an insurance business that is a customer of a financial institution, as opposed to an institution selling insurance as a separate line of business. | This discussion refers to an insurance business that is a customer of a financial institution, as opposed to an institution selling insurance as a separate line of business. |
| 36095efd1262-467c-452e-9dfb-94d0dbb12be5 | Not Translated (0%) | There are several risks specific to insurance companies as customers. | There are several risks specific to insurance companies as customers. |
| 36105efd1262-467c-452e-9dfb-94d0dbb12be5 | Not Translated (0%) | Consider the following questions: | Consider the following questions: |
| 3611765d2a5e-f863-4fb1-9c00-327432a5d55c | Not Translated (0%) | Does the customer use brokers or intermediaries in jurisdictions known to be high risk for SDD purposes? | Does the customer use brokers or intermediaries in jurisdictions known to be high risk for SDD purposes? |
| 3612db55ec44-49c0-4e5f-942d-772c86ab12ce | Not Translated (0%) | Are their brokers required to do SDD checks on individuals for whom they underwrite policies? | Are their brokers required to do SDD checks on individuals for whom they underwrite policies? |
| 36133d975ee2-7e86-4a87-97d5-6b7b3453bdb6 | Not Translated (0%) | Who is the target customer base? | Who is the target customer base? |
| 36148c05a40d-8d69-4748-a834-7dddeeb01b9b | Not Translated (0%) | What are their procedures to identify the beneficial owner(s) of their customers? | What are their procedures to identify the beneficial owner(s) of their customers? |
| 36159f645734-8188-4c39-b39c-f2564a0c007c | Not Translated (0%) | Regarding the customer’s nature of business, an organization should examine the products (e.g., cash aspects of life insurance/annuities), policy coverage, and investment-based insurance products. | Regarding the customer’s nature of business, an organization should examine the products (e.g., cash aspects of life insurance/annuities), policy coverage, and investment-based insurance products. |
| 36169f645734-8188-4c39-b39c-f2564a0c007c | Not Translated (0%) | Consider the example of a life insurance company in which a policyholder can operate entirely within non-sanctions risk parameters, but by virtue of their insured activity engage in a one-time heightened sanctions compliance risk. | Consider the example of a life insurance company in which a policyholder can operate entirely within non-sanctions risk parameters, but by virtue of their insured activity engage in a one-time heightened sanctions compliance risk. |
| 36179f645734-8188-4c39-b39c-f2564a0c007c | Not Translated (0%) | For example, a life insurance company could issue a policy with an unknown beneficiary. | For example, a life insurance company could issue a policy with an unknown beneficiary. |
| 36189f645734-8188-4c39-b39c-f2564a0c007c | Not Translated (0%) | Upon being required to pay out, the insurance company could discover the beneficiary to be a sanctioned individual or related to a sanctioned individual. | Upon being required to pay out, the insurance company could discover the beneficiary to be a sanctioned individual or related to a sanctioned individual. |
| 3619b9257d7c-6049-463e-ae67-7ddf600af267 | Not Translated (0%) | Investment-based insurance products that are provided in a “wrapper” (i.e., instruments into which investors can place stocks, hedge funds, or other bankable assets, allowing them to pay less tax on investment income) can potentially be caught by sectoral sanctions, such as those imposed against Russia. | Investment-based insurance products that are provided in a “wrapper” (i.e., instruments into which investors can place stocks, hedge funds, or other bankable assets, allowing them to pay less tax on investment income) can potentially be caught by sectoral sanctions, such as those imposed against Russia. |
| 3620b9257d7c-6049-463e-ae67-7ddf600af267 | Not Translated (0%) | An organization should determine how the insurer checks for such situations. | An organization should determine how the insurer checks for such situations. |
| 3621b9257d7c-6049-463e-ae67-7ddf600af267 | Not Translated (0%) | As with correspondent banking, it is vital to obtain information about the adequacy of the insurer’s sanctions compliance program. | As with correspondent banking, it is vital to obtain information about the adequacy of the insurer’s sanctions compliance program. |
| 3622b9257d7c-6049-463e-ae67-7ddf600af267 | Not Translated (0%) | When insurance is provided through an agent, broker, or other third party, an organization must verify what measures the insurer takes to ensure they have controls in place to identify and mitigate sanctions risks. | When insurance is provided through an agent, broker, or other third party, an organization must verify what measures the insurer takes to ensure they have controls in place to identify and mitigate sanctions risks. |
| 3623971451ee-bc12-4927-ac09-e96219c1823d | Not Translated (0%) | From the perspective of jurisdiction/geography, an organization should determine in which countries the customer sells its products and identify their geographic scope of coverage. | From the perspective of jurisdiction/geography, an organization should determine in which countries the customer sells its products and identify their geographic scope of coverage. |
| 3624971451ee-bc12-4927-ac09-e96219c1823d | Not Translated (0%) | It is important to determine where their brokers and intermediaries are based and where the products are sold. | It is important to determine where their brokers and intermediaries are based and where the products are sold. |
| 3625971451ee-bc12-4927-ac09-e96219c1823d | Not Translated (0%) | Is the policy coverage domestic or overseas? | Is the policy coverage domestic or overseas? |
| 3626971451ee-bc12-4927-ac09-e96219c1823d | Not Translated (0%) | Consider a scenario in which a customer travels to a low-risk jurisdiction, such as the Indian Ocean, and a medical emergency or humanitarian crisis results in his or her presence in Iran. | Consider a scenario in which a customer travels to a low-risk jurisdiction, such as the Indian Ocean, and a medical emergency or humanitarian crisis results in his or her presence in Iran. |
| 3627971451ee-bc12-4927-ac09-e96219c1823d | Not Translated (0%) | Would the financial institution be expected to pay out the policy to an account in Iran to pay for the required medical treatment? | Would the financial institution be expected to pay out the policy to an account in Iran to pay for the required medical treatment? |
| 3628edcb9e7d-671b-4d40-a62e-30903eb109e2 | Not Translated (0%) | OTHER INDUSTRIES | OTHER INDUSTRIES |
| 3629219396d9-7eec-48e6-8b2e-5c42e51b5fd5 | Not Translated (0%) | Seemingly mundane or ordinary industries can still have exposure to sanctions risk. | Seemingly mundane or ordinary industries can still have exposure to sanctions risk. |
| 3630219396d9-7eec-48e6-8b2e-5c42e51b5fd5 | Not Translated (0%) | When sanctions loopholes are closed, those individuals and entities being sanctioned can seek alternatives to circumvent the sanctions in an ongoing game of “cat and mouse.” | When sanctions loopholes are closed, those individuals and entities being sanctioned can seek alternatives to circumvent the sanctions in an ongoing game of “cat and mouse.” |
| 3631219396d9-7eec-48e6-8b2e-5c42e51b5fd5 | Not Translated (0%) | The North Korean government in particular exports numerous laborers to fulfill contracts abroad with the revenues going to the North Korean government. | The North Korean government in particular exports numerous laborers to fulfill contracts abroad with the revenues going to the North Korean government. |
| 3632219396d9-7eec-48e6-8b2e-5c42e51b5fd5 | Not Translated (0%) | The industries include “apparel, construction, footwear manufacturing, hospitality, IT services, logging, medical, pharmaceuticals, restaurants, seafood processing, textiles, and shipbuilding.” | The industries include “apparel, construction, footwear manufacturing, hospitality, IT services, logging, medical, pharmaceuticals, restaurants, seafood processing, textiles, and shipbuilding.” |
| 36330f406311-6a1a-4b6d-b882-e8f0efc51281 | Not Translated (0%) | “North Korea Sanctions & Enforcement Actions Advisory: | “North Korea Sanctions & Enforcement Actions Advisory: |
| 36340f406311-6a1a-4b6d-b882-e8f0efc51281 | Not Translated (0%) | Risks for Businesses with Supply Chain Links to North Korea,” US Department of the Treasury, July 23, 2018. | Risks for Businesses with Supply Chain Links to North Korea,” US Department of the Treasury, July 23, 2018. |
| 36358a845e83-8101-4445-abaf-daf056cffa17 | Not Translated (0%) | Although China and Russia utilize the most North Korean overseas labor, other countries such as Singapore, the UAE, and Poland have been reported as having hosted forced labor. | Although China and Russia utilize the most North Korean overseas labor, other countries such as Singapore, the UAE, and Poland have been reported as having hosted forced labor. |
| 36368a845e83-8101-4445-abaf-daf056cffa17 | Not Translated (0%) | The US State Department and other nonprofit organizations provide reports and lists on countries hosting North Korean laborers on an ongoing basis. | The US State Department and other nonprofit organizations provide reports and lists on countries hosting North Korean laborers on an ongoing basis. |
| 3637130368d7-da1e-4a69-a2b2-881d8dabed26 | Not Translated (0%) | In April 2019, it was widely reported that North Korea was reportedly using cryptocurrency to evade sanctions and fund the development of nuclear weapons. | In April 2019, it was widely reported that North Korea was reportedly using cryptocurrency to evade sanctions and fund the development of nuclear weapons. |
| 3638130368d7-da1e-4a69-a2b2-881d8dabed26 | Not Translated (0%) | A study published by the established and well-regarded Royal United Services Institute (RUSI) revealed how the exploitation of bitcoin and other cryptocurrencies through cybercrime activities offers a “financial lifeline” to North Korea as it seeks to develop its weapons of mass destruction (WMD) program. | A study published by the established and well-regarded Royal United Services Institute (RUSI) revealed how the exploitation of bitcoin and other cryptocurrencies through cybercrime activities offers a “financial lifeline” to North Korea as it seeks to develop its weapons of mass destruction (WMD) program. |
| 36399d8e5198-98cf-4b19-a074-ecec9152e8ca | Not Translated (0%) | Real Estate | Real Estate |
| 36402c0436a6-b8d3-43b3-9000-26d8066329af | Not Translated (0%) | Real estate purchases made in cash by US–based limited liability corporations or trust structures can enable buyers to avoid detection; the same is true in Europe, where ownership information is not public. | Real estate purchases made in cash by US–based limited liability corporations or trust structures can enable buyers to avoid detection; the same is true in Europe, where ownership information is not public. |
| 3641c703c1dd-e856-4741-aa39-55aba23df0f9 | Not Translated (0%) | In 2018, the Global Initiative Against Transnational Organized Crime identified 44 properties in the United Arab Emirates (UAE) worth approximately $28.2 million that were directly associated with sanctioned individuals, as well as 37 properties worth approximately $78.8 million within their expanded networks. | In 2018, the Global Initiative Against Transnational Organized Crime identified 44 properties in the United Arab Emirates (UAE) worth approximately $28.2 million that were directly associated with sanctioned individuals, as well as 37 properties worth approximately $78.8 million within their expanded networks. |
| 3642c703c1dd-e856-4741-aa39-55aba23df0f9 | Not Translated (0%) | Each of these individuals had been sanctioned by the United States, and many also were designated by the European Union and EU Member States. | Each of these individuals had been sanctioned by the United States, and many also were designated by the European Union and EU Member States. |
| 3643c703c1dd-e856-4741-aa39-55aba23df0f9 | Not Translated (0%) | Such sources of information should be consulted when an institution is involved with real estate transactions in the Middle East, for example. | Such sources of information should be consulted when an institution is involved with real estate transactions in the Middle East, for example. |
| 36440370caf4-fe2c-44bd-9aeb-da83cf046314 | Not Translated (0%) | “North Korea Sanctions & Enforcement Actions Advisory: | “North Korea Sanctions & Enforcement Actions Advisory: |
| 36450370caf4-fe2c-44bd-9aeb-da83cf046314 | Not Translated (0%) | Risks for Businesses with Supply Chain Links to North Korea,” US Department of the Treasury, July 23, 2018. | Risks for Businesses with Supply Chain Links to North Korea,” US Department of the Treasury, July 23, 2018. |
| 3646c94a8d2f-f171-4aa6-895c-f2c1cacb4365 | Not Translated (0%) | The following is a list of red flags identified by the researchers: | The following is a list of red flags identified by the researchers: |
| 364789d3648c-1e11-4c63-afed-df5e9b52a300 | Not Translated (0%) | The properties associated with the sanctioned individuals were directly connected to information within their sanctions designations. | The properties associated with the sanctioned individuals were directly connected to information within their sanctions designations. |
| 364889d3648c-1e11-4c63-afed-df5e9b52a300 | Not Translated (0%) | A total of 44 properties were identified that were associated with the primary sanctioned subjects across the seven profiles, of which 42 were previously unidentified. | A total of 44 properties were identified that were associated with the primary sanctioned subjects across the seven profiles, of which 42 were previously unidentified. |
| 36498bb815cc-4b7d-4772-ac17-9600655f7a6f | Not Translated (0%) | Expansive unsanctioned corporate networks, often with direct ties to the individuals’ Dubai properties, extended to jurisdictions as wide ranging as Syria, Romania, Mexico, Cyprus, Lebanon, Hong Kong, the United States, Liberia, and the British Virgin Islands. | Expansive unsanctioned corporate networks, often with direct ties to the individuals’ Dubai properties, extended to jurisdictions as wide ranging as Syria, Romania, Mexico, Cyprus, Lebanon, Hong Kong, the United States, Liberia, and the British Virgin Islands. |
| 3650cc237e18-96c1-40a8-8f47-22ddfe244dbc | Not Translated (0%) | There was extensive use of family and third-party networks, such as lawyers, business partners, and nominees to obscure beneficial ownership of both sanctioned and unsanctioned commercial entities. | There was extensive use of family and third-party networks, such as lawyers, business partners, and nominees to obscure beneficial ownership of both sanctioned and unsanctioned commercial entities. |
| 3651889ae3d3-ede3-41cf-b270-3c97bd1eb1d8 | Not Translated (0%) | Research identified ongoing activities for which the individuals and networks were originally sanctioned—activities that were, in some cases, more prolific than they were prior to the sanctions. | Research identified ongoing activities for which the individuals and networks were originally sanctioned—activities that were, in some cases, more prolific than they were prior to the sanctions. |
| 3652647a3688-b981-4990-9afb-5b96712d1d2e | Not Translated (0%) | An example from the report: | An example from the report: |
| 3653647a3688-b981-4990-9afb-5b96712d1d2e | Not Translated (0%) | Wael Abdulkarim and Ahmad Barqawi were sanctioned for smuggling fuel to Syria in support of the government’s military operations. | Wael Abdulkarim and Ahmad Barqawi were sanctioned for smuggling fuel to Syria in support of the government’s military operations. |
| 3654647a3688-b981-4990-9afb-5b96712d1d2e | Not Translated (0%) | They were associated with three properties in the UAE that were collectively worth $867,067. | They were associated with three properties in the UAE that were collectively worth $867,067. |
| 3655647a3688-b981-4990-9afb-5b96712d1d2e | Not Translated (0%) | These individuals also continued smuggling fuel to Syria at a higher frequency than before the sanctions, using the same vessels as well as previously unidentified and unsanctioned vessels and companies. | These individuals also continued smuggling fuel to Syria at a higher frequency than before the sanctions, using the same vessels as well as previously unidentified and unsanctioned vessels and companies. |
| 36561dc783c3-2417-41d8-ab25-233508630e96 | Not Translated (0%) | Luxury Goods | Luxury Goods |
| 365734730999-fed6-4286-8a13-a5b35dac025c | Not Translated (0%) | The luxury goods industry can carry specific sanctions risks. | The luxury goods industry can carry specific sanctions risks. |
| 365834730999-fed6-4286-8a13-a5b35dac025c | Not Translated (0%) | Jurisdictions that have been subject to sanctions measures for some time, and thus have been frozen out of the global financial system, are likely to be “cash-rich” and key consumers of luxury goods. | Jurisdictions that have been subject to sanctions measures for some time, and thus have been frozen out of the global financial system, are likely to be “cash-rich” and key consumers of luxury goods. |
| 365934730999-fed6-4286-8a13-a5b35dac025c | Not Translated (0%) | Examples of luxury goods include: | Examples of luxury goods include: |
| 3660f4ecc5cf-52c8-43fa-b97c-2658f4c7e57e | Not Translated (0%) | Villas, apartments, and estates | Villas, apartments, and estates |
| 3661141f9158-ca94-4dcd-b986-779128e1c8c2 | Not Translated (0%) | Sports cars | Sports cars |
| 366237d9f9a6-b0c0-425d-8fad-549aa4f74408 | Not Translated (0%) | Gemstones and jewelry | Gemstones and jewelry |
| 36632bdad26e-51bf-45d4-9f11-f678bf303c59 | Not Translated (0%) | Fine art | Fine art |
| 3664bfbba083-95f2-472d-8c9b-cf972287322c | Not Translated (0%) | Antiquities | Antiquities |
| 366547494abc-934c-49e2-a983-2c81f416d43e | Not Translated (0%) | The key sanctions risk areas for customers (including producers, dealers, and collectors) in the luxury goods sector are similar to those for other high-risk lines of business. | The key sanctions risk areas for customers (including producers, dealers, and collectors) in the luxury goods sector are similar to those for other high-risk lines of business. |
| 366647494abc-934c-49e2-a983-2c81f416d43e | Not Translated (0%) | It is important to understand the target customer base and end users. | It is important to understand the target customer base and end users. |
| 3667a590a362-7bea-4ce6-88de-6d1065aa2c4c | Not Translated (0%) | The nature of the business and the provenance of the goods (i.e., the chain of ownership and authenticity) involved are risk factors unique to this business. | The nature of the business and the provenance of the goods (i.e., the chain of ownership and authenticity) involved are risk factors unique to this business. |
| 3668a590a362-7bea-4ce6-88de-6d1065aa2c4c | Not Translated (0%) | For example, there have been a number of reports about antiquities being looted from Syria and then sold to dealers outside of the region. | For example, there have been a number of reports about antiquities being looted from Syria and then sold to dealers outside of the region. |
| 3669a590a362-7bea-4ce6-88de-6d1065aa2c4c | Not Translated (0%) | Sanctions targets also can attempt to sell stolen goods, or goods purchased with corrupt earnings, via a dealer or wholesaler. | Sanctions targets also can attempt to sell stolen goods, or goods purchased with corrupt earnings, via a dealer or wholesaler. |
| 36707f436cfc-94fd-482f-aad4-31b33de54b3b | Not Translated (0%) | It is important to understand a customer’s products and whether they are wholesale, retail, or resale. | It is important to understand a customer’s products and whether they are wholesale, retail, or resale. |
| 36717f436cfc-94fd-482f-aad4-31b33de54b3b | Not Translated (0%) | An organization should assess the volume of international transactions, the frequency of thirdparty recipients (“gifts”), the provenance of goods, and the adequacy of the customer’s sanctions compliance program. | An organization should assess the volume of international transactions, the frequency of thirdparty recipients (“gifts”), the provenance of goods, and the adequacy of the customer’s sanctions compliance program. |
| 367271a5032c-fd8b-45de-846b-3c98c1fd8dc4 | Not Translated (0%) | With regard to the jurisdiction/geography factor in the luxury goods business, a determination should be made as to whether overseas shipping is part of the customer’s service. | With regard to the jurisdiction/geography factor in the luxury goods business, a determination should be made as to whether overseas shipping is part of the customer’s service. |
| 367371a5032c-fd8b-45de-846b-3c98c1fd8dc4 | Not Translated (0%) | It is also important to locate the target customer base. | It is also important to locate the target customer base. |
| 367471a5032c-fd8b-45de-846b-3c98c1fd8dc4 | Not Translated (0%) | Certain goods and parts of the world, such as luxury real estate in Dubai, watches in Switzerland, and yachts in the Mediterranean, are known for having customers who are repeat purchasers of luxury goods. | Certain goods and parts of the world, such as luxury real estate in Dubai, watches in Switzerland, and yachts in the Mediterranean, are known for having customers who are repeat purchasers of luxury goods. |
| 367571a5032c-fd8b-45de-846b-3c98c1fd8dc4 | Not Translated (0%) | Are there sanctions risks associated with those jurisdictions? | Are there sanctions risks associated with those jurisdictions? |
| 3676b8e1be30-7b8b-446d-9b97-f031acda9bcd | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 3677b8e1be30-7b8b-446d-9b97-f031acda9bcd | Not Translated (0%) | RICHEMONT NA, 2017 | RICHEMONT NA, 2017 |
| 36786c916866-b95a-4b8e-bcff-f556ee7cb28c | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 36799dca39ae-0d20-452f-8cf8-7563727f4769 | Not Translated (0%) | Richemont North America, Inc., the parent company of the luxury brand Cartier, was fined USD | Richemont North America, Inc., the parent company of the luxury brand Cartier, was fined USD |
| 3680021cfdac-2146-4029-9fc3-066fff675164 | Not Translated (0%) | $335,000 for violating US narcotics trafficking sanctions. | $335,000 for violating US narcotics trafficking sanctions. |
| 3681021cfdac-2146-4029-9fc3-066fff675164 | Not Translated (0%) | An individual purchased jewelry from boutiques located in California and Nevada and requested that the jeweler ship them to another address—that of a specially designated national (SDN). | An individual purchased jewelry from boutiques located in California and Nevada and requested that the jeweler ship them to another address—that of a specially designated national (SDN). |
| 3682021cfdac-2146-4029-9fc3-066fff675164 | Not Translated (0%) | The buyer provided the SDN’s name and mailing address for the shipment. | The buyer provided the SDN’s name and mailing address for the shipment. |
| 3683021cfdac-2146-4029-9fc3-066fff675164 | Not Translated (0%) | That address was included in the SDN list, but Richemont did not identify the sanctions risk. | That address was included in the SDN list, but Richemont did not identify the sanctions risk. |
| 3684047207ce-3805-459f-87f9-9173ffa56d28 | Not Translated (0%) | “Settlement Agreement between the US Department of the Treasury’s Office of Foreign Assets Control and Richemont North America, Inc. d.b.a. | “Settlement Agreement between the US Department of the Treasury’s Office of Foreign Assets Control and Richemont North America, Inc. d.b.a. |
| 3685047207ce-3805-459f-87f9-9173ffa56d28 | Not Translated (0%) | Cartier,” US Department of the Treasury, September 26, 2017. | Cartier,” US Department of the Treasury, September 26, 2017. |
| 368675c66807-c5fe-416b-9d8e-260d287a499d | Not Translated (0%) | , | , |
| 3687ad0ee039-1067-4dad-8197-8f5043337155 | Not Translated (0%) | US Department of the Treasury, Enforcement Information for September 26, 2017. | US Department of the Treasury, Enforcement Information for September 26, 2017. |
| 3688d151a97c-cfb7-41ab-b023-98728a8b72ce | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 36897cdac61a-e015-42a4-b084-3ee157d510e0 | Not Translated (0%) | All available information should be screened against SDN and other lists, as this can be helpful in identifying sanctioned individuals and entities. | All available information should be screened against SDN and other lists, as this can be helpful in identifying sanctioned individuals and entities. |
| 3690492b2d28-a48b-4037-bc81-403cb1358941 | Not Translated (0%) | An organization should develop red flag indicators, such as a request to ship to another address. | An organization should develop red flag indicators, such as a request to ship to another address. |
| 3691c5e03a54-29ee-4279-8465-75121e826cb7 | Not Translated (0%) | It is important to undertake enhanced due diligence on high-risk products, such as high-value goods. | It is important to undertake enhanced due diligence on high-risk products, such as high-value goods. |
| 3692c5e03a54-29ee-4279-8465-75121e826cb7 | Not Translated (0%) | Additional research could have helped uncover the sanctions risk in this case. | Additional research could have helped uncover the sanctions risk in this case. |
| 3693dfda531f-280d-4c7e-b534-9bca068c1563 | Not Translated (0%) | Precious Metals and Mining | Precious Metals and Mining |
| 369410ad9afa-d0da-4599-8797-b447d9c22cbb | Not Translated (0%) | UN resolutions targeting and sanctioning warlords and perpetrators of human rights abuses in the Democratic Republic of the Congo (DRC) are an example of sanctions restrictions targeted at the high-risk precious metals and mining industries. | UN resolutions targeting and sanctioning warlords and perpetrators of human rights abuses in the Democratic Republic of the Congo (DRC) are an example of sanctions restrictions targeted at the high-risk precious metals and mining industries. |
| 369510ad9afa-d0da-4599-8797-b447d9c22cbb | Not Translated (0%) | In November 2012, escalation of fighting in the eastern province of the DRC, involving the notorious rebel group M23 and government forces, brought the decade-long armed conflict in that region to the top of the international agenda. | In November 2012, escalation of fighting in the eastern province of the DRC, involving the notorious rebel group M23 and government forces, brought the decade-long armed conflict in that region to the top of the international agenda. |
| 369610ad9afa-d0da-4599-8797-b447d9c22cbb | Not Translated (0%) | As a consequence, direct and indirect support for armed conflict by way of criminal offenses connected to the mining and processing of 3TG minerals (tantalum, tungsten, tin, and gold) poses a serious risk. | As a consequence, direct and indirect support for armed conflict by way of criminal offenses connected to the mining and processing of 3TG minerals (tantalum, tungsten, tin, and gold) poses a serious risk. |
| 369710ad9afa-d0da-4599-8797-b447d9c22cbb | Not Translated (0%) | This type of sanctions risk exposure sits at the nexus to other due diligence requirements set out by the Organisation for Economic Co-operation and Development (OECD) in relation to human rights violations. | This type of sanctions risk exposure sits at the nexus to other due diligence requirements set out by the Organisation for Economic Co-operation and Development (OECD) in relation to human rights violations. |
| 369887ada0f2-1d9c-4109-8359-f25c0aed185a | Not Translated (0%) | Supply chain due diligence can help to ensure the integrity of direct and indirect suppliers given the potentially great number of suppliers who may, by their associations and practices, pose a serious sanctions risk and reputation risk by association. | Supply chain due diligence can help to ensure the integrity of direct and indirect suppliers given the potentially great number of suppliers who may, by their associations and practices, pose a serious sanctions risk and reputation risk by association. |
| 36990b56963e-f3c9-4bde-a666-f69a4a75f572 | Not Translated (0%) | EMERGING THREATS | EMERGING THREATS |
| 3700a68f8fbc-ba9a-46bd-aacb-b815e347555b | Not Translated (0%) | As stated previously, it is essential that compliance professionals stay current on sanctions. | As stated previously, it is essential that compliance professionals stay current on sanctions. |
| 3701a68f8fbc-ba9a-46bd-aacb-b815e347555b | Not Translated (0%) | This includes keeping informed of emerging threats, such as cyber-enabled crime. | This includes keeping informed of emerging threats, such as cyber-enabled crime. |
| 3702e2a59acd-37d5-4899-92d5-ac01c1c09f1d | Not Translated (0%) | Cyber-Related Sanctions | Cyber-Related Sanctions |
| 3703004c33e7-8355-48d6-a8b5-89a75b34d45e | Not Translated (0%) | In April of 2015, OFAC implemented its Cyber-Related Sanctions program because of the president’s Executive Order (E.O.) | In April of 2015, OFAC implemented its Cyber-Related Sanctions program because of the president’s Executive Order (E.O.) |
| 3704004c33e7-8355-48d6-a8b5-89a75b34d45e | Not Translated (0%) | 13694. | 13694. |
| 3705004c33e7-8355-48d6-a8b5-89a75b34d45e | Not Translated (0%) | The president had declared a national emergency “to deal with the unusual and extraordinary threat to the national security, foreign policy, and economy of the United States constituted by the increasing prevalence and severity of malicious cyber-enabled activities originating from, or directed by persons located, in whole or in substantial part, outside the United States.” | The president had declared a national emergency “to deal with the unusual and extraordinary threat to the national security, foreign policy, and economy of the United States constituted by the increasing prevalence and severity of malicious cyber-enabled activities originating from, or directed by persons located, in whole or in substantial part, outside the United States.” |
| 3706bf875558-136a-4d1f-a981-326a47b71b97 | Not Translated (0%) | OFAC, “Cyber-Related Sanctions Program,” July 3, 2017. | OFAC, “Cyber-Related Sanctions Program,” July 3, 2017. |
| 37071437ce5e-dac3-45a5-b729-8b45e14374dd | Not Translated (0%) | This order authorized the imposition of sanctions against people deemed responsible for various malicious cyber-enabled activities. | This order authorized the imposition of sanctions against people deemed responsible for various malicious cyber-enabled activities. |
| 37081437ce5e-dac3-45a5-b729-8b45e14374dd | Not Translated (0%) | On December 28, 2016, E.O. | On December 28, 2016, E.O. |
| 37091437ce5e-dac3-45a5-b729-8b45e14374dd | Not Translated (0%) | 13757 was issued, which amended E.O. | 13757 was issued, which amended E.O. |
| 37101437ce5e-dac3-45a5-b729-8b45e14374dd | Not Translated (0%) | 13694 to include the authorization of sanctions related to interfering with election processes or institutions. | 13694 to include the authorization of sanctions related to interfering with election processes or institutions. |
| 37117bf930a7-e7df-4aba-96e9-ed9b1ab159e2 | Not Translated (0%) | This is an example of the need to anticipate future risks. | This is an example of the need to anticipate future risks. |
| 371226fd8e29-309b-4696-af3d-1e4e7be6330b | Not Translated (0%) | Technology Companies | Technology Companies |
| 37130ee3bb06-db97-4a4b-86bc-4b7cda957d88 | Not Translated (0%) | Additionally, technology companies can be used to evade sanctions. | Additionally, technology companies can be used to evade sanctions. |
| 37140ee3bb06-db97-4a4b-86bc-4b7cda957d88 | Not Translated (0%) | For example, in May of 2019, BIS added Huawei Technologies Co., Ltd. to the EAR Entities List due to its involvement in activities that were contrary to the foreign policy or national security interest of the US. | For example, in May of 2019, BIS added Huawei Technologies Co., Ltd. to the EAR Entities List due to its involvement in activities that were contrary to the foreign policy or national security interest of the US. |
| 37150ee3bb06-db97-4a4b-86bc-4b7cda957d88 | Not Translated (0%) | Specifically, the US District Court for the Eastern District of New York indicted Huawei for thirteen counts of violating US law by making transactions with Iran and doing business with Iran-based telecom companies. | Specifically, the US District Court for the Eastern District of New York indicted Huawei for thirteen counts of violating US law by making transactions with Iran and doing business with Iran-based telecom companies. |
| 3716de7b1b0c-9cd9-499f-8dd2-b5d12eb6cf8d | Not Translated (0%) | 84 FR 22961, May 21, 2019. | 84 FR 22961, May 21, 2019. |
| 371777c5f16a-c126-46a6-972a-c5357d9b8b79 | Not Translated (0%) | According to the indictment, Skycom Tech Co. Ltd was a corporation registered in Hong Kong whose primary operations were in Iran. | According to the indictment, Skycom Tech Co. Ltd was a corporation registered in Hong Kong whose primary operations were in Iran. |
| 371877c5f16a-c126-46a6-972a-c5357d9b8b79 | Not Translated (0%) | Huawei operated Skycom as an unofficial subsidiary to obtain otherwise prohibited US–origin goods, technology, and services, including banking services, for Huawei’s Iran-based business while concealing the link to Huawei. | Huawei operated Skycom as an unofficial subsidiary to obtain otherwise prohibited US–origin goods, technology, and services, including banking services, for Huawei’s Iran-based business while concealing the link to Huawei. |
| 371977c5f16a-c126-46a6-972a-c5357d9b8b79 | Not Translated (0%) | The case claims that Huawei’s networking equipment poses a national security threat. | The case claims that Huawei’s networking equipment poses a national security threat. |
| 37200c9277f7-0d68-419b-afca-3df424535e84 | Not Translated (0%) | United States of America v. Huawei Technologies Co., Ltd Et Al, United States District Court, Eastern District of New York, January 24, 2019. | United States of America v. Huawei Technologies Co., Ltd Et Al, United States District Court, Eastern District of New York, January 24, 2019. |
| 3721464a5597-ad49-4956-8049-c803ca018382 | Not Translated (0%) | It would be impossible to predict every act that could pose a sanctions threat; however, it is important to consider how industries traditionally considered low-risk could be used to evade sanctions. | It would be impossible to predict every act that could pose a sanctions threat; however, it is important to consider how industries traditionally considered low-risk could be used to evade sanctions. |
| 37221d9bded4-289d-4542-b8bd-1d3c6982d8bc | Not Translated (0%) | Sanctions Screening | Sanctions Screening |
| 372339e6aaf8-3aab-49c8-a066-3d297c5fea89 | Not Translated (0%) | Sanctions Screening | Sanctions Screening |
| 37248b98fc2b-3033-46c2-92fb-4e8e99d2e7a8 | Not Translated (0%) | Sanctions screening is one of the key controls of an effective sanctions compliance program. | Sanctions screening is one of the key controls of an effective sanctions compliance program. |
| 37258b98fc2b-3033-46c2-92fb-4e8e99d2e7a8 | Not Translated (0%) | In simple terms, screening involves checking information obtained about a person, entity, goods, or services against sanctions lists that prohibit making funds or financial services available and/or restrict or prohibit trade in certain goods or services. | In simple terms, screening involves checking information obtained about a person, entity, goods, or services against sanctions lists that prohibit making funds or financial services available and/or restrict or prohibit trade in certain goods or services. |
| 37268b98fc2b-3033-46c2-92fb-4e8e99d2e7a8 | Not Translated (0%) | When screening generates an alert, the data is reviewed and assessed. | When screening generates an alert, the data is reviewed and assessed. |
| 37278b98fc2b-3033-46c2-92fb-4e8e99d2e7a8 | Not Translated (0%) | An alert is a review of a hit, or multiple hits, of internal record information checked against sanctions screening lists. | An alert is a review of a hit, or multiple hits, of internal record information checked against sanctions screening lists. |
| 37288b98fc2b-3033-46c2-92fb-4e8e99d2e7a8 | Not Translated (0%) | One alert generally includes the internal record information and the hits against the various discrete entries on the sanctions lists with the percentage match (threshold). | One alert generally includes the internal record information and the hits against the various discrete entries on the sanctions lists with the percentage match (threshold). |
| 3729aa407dd4-c44d-45ce-86ce-99affdc55c33 | Not Translated (0%) | When a true match is identified, or a potential match cannot be discounted, the alert is escalated through a dedicated flow in the screening tool, or via other communication channels in the case of manual screening or filtering. | When a true match is identified, or a potential match cannot be discounted, the alert is escalated through a dedicated flow in the screening tool, or via other communication channels in the case of manual screening or filtering. |
| 3730aa407dd4-c44d-45ce-86ce-99affdc55c33 | Not Translated (0%) | The sanctions compliance officer (SCO) receives the alert, reviews it, conducts further investigation if necessary, and reports as appropriate. | The sanctions compliance officer (SCO) receives the alert, reviews it, conducts further investigation if necessary, and reports as appropriate. |
| 3731e9037668-9b82-4430-aa3c-740fb4838a22 | Not Translated (0%) | This chapter describes screening targets, name screening, payment screening, information technology, regulatory matters, and trade-activity screening. | This chapter describes screening targets, name screening, payment screening, information technology, regulatory matters, and trade-activity screening. |
| 3732da00893b-743b-45f8-a48f-7ae447e275af | Not Translated (0%) | Screening Targets | Screening Targets |
| 3733cd6206e5-dd90-45be-ac5d-8955b5299ea8 | Not Translated (0%) | Who and what are the targets of sanctions screening? | Who and what are the targets of sanctions screening? |
| 3734cd6206e5-dd90-45be-ac5d-8955b5299ea8 | Not Translated (0%) | Unlike anti-money laundering (AML) requirements, which are limited to customers of the business, sanctions restrictions apply to all business activities and therefore to third parties. | Unlike anti-money laundering (AML) requirements, which are limited to customers of the business, sanctions restrictions apply to all business activities and therefore to third parties. |
| 3735cd6206e5-dd90-45be-ac5d-8955b5299ea8 | Not Translated (0%) | The types of different business activities and, in turn, the types of parties that should be screened, include, but are in no way limited to, the following business arrangements: | The types of different business activities and, in turn, the types of parties that should be screened, include, but are in no way limited to, the following business arrangements: |
| 373654033262-b102-4e5d-8367-aaf9bbb309a2 | Not Translated (0%) | Brokers | Brokers |
| 37375338575c-ab0c-4300-99b0-e7c6413dfe1b | Not Translated (0%) | Agents | Agents |
| 37385207f848-6656-4897-96a6-35678ec3aee6 | Not Translated (0%) | Vendors and other intermediaries | Vendors and other intermediaries |
| 3739333a78c1-79e8-4175-9623-b19367a84bfb | Not Translated (0%) | Trade finance and export-related activities | Trade finance and export-related activities |
| 3740d36ce3dd-4144-4c88-8020-b7d71149e583 | Not Translated (0%) | Purchasing, order processing, distribution, and payment management | Purchasing, order processing, distribution, and payment management |
| 3741fd0016ed-f0e2-4fbf-bbbe-8217b50e1f87 | Not Translated (0%) | Beneficial owners | Beneficial owners |
| 3742c19104c3-a481-4f98-95c1-7d140c0a35b3 | Not Translated (0%) | The following are examples of the business arrangements that can present sanctions risks and suggestions for mitigating the risks: | The following are examples of the business arrangements that can present sanctions risks and suggestions for mitigating the risks: |
| 3743aead3f19-2d85-487c-b977-98db90735088 | Not Translated (0%) | Joint ventures and mergers involving multiple parties can present sanctions risks. | Joint ventures and mergers involving multiple parties can present sanctions risks. |
| 3744aead3f19-2d85-487c-b977-98db90735088 | Not Translated (0%) | There are beneficial owners and controllers to consider, as well as the types of goods and services involved, and where they came from. | There are beneficial owners and controllers to consider, as well as the types of goods and services involved, and where they came from. |
| 3745aead3f19-2d85-487c-b977-98db90735088 | Not Translated (0%) | It is important to learn the identity and activity of all business parties. | It is important to learn the identity and activity of all business parties. |
| 3746cc6c594a-78b8-46ac-bbd5-7f696e68fc47 | Not Translated (0%) | In mergers and acquisitions, businesses “inherit” the sanctions violations committed by the company they acquire. | In mergers and acquisitions, businesses “inherit” the sanctions violations committed by the company they acquire. |
| 3747cc6c594a-78b8-46ac-bbd5-7f696e68fc47 | Not Translated (0%) | In such cases, checking a business’ sanctions compliance history is an important part of the due diligence that is undertaken before a business is purchased. | In such cases, checking a business’ sanctions compliance history is an important part of the due diligence that is undertaken before a business is purchased. |
| 3748780670e3-4736-4fa8-88df-3ecc82e84773 | Not Translated (0%) | When subcontractors and distributors are involved in a project, it is necessary to check their sanctions compliance history, as well as the identity of their owners and directors and the activities in which they engage. | When subcontractors and distributors are involved in a project, it is necessary to check their sanctions compliance history, as well as the identity of their owners and directors and the activities in which they engage. |
| 374985bc4103-c5aa-4f77-961b-12409779ef85 | Not Translated (0%) | Although brokers and agents are not always physically close and in regular contact with an organization, financial institutions are required to take steps to ensure that these parties, who are acting on behalf of the institution, comply with sanctions restrictions. | Although brokers and agents are not always physically close and in regular contact with an organization, financial institutions are required to take steps to ensure that these parties, who are acting on behalf of the institution, comply with sanctions restrictions. |
| 3750154f1754-5384-42b6-bd9c-83dcd83be666 | Not Translated (0%) | Organizations must look carefully at parties and processes related to purchasing, order processing, distribution, and payment management. | Organizations must look carefully at parties and processes related to purchasing, order processing, distribution, and payment management. |
| 3751154f1754-5384-42b6-bd9c-83dcd83be666 | Not Translated (0%) | It is wise not to assume that “back office” activities are not affected by sanctions. | It is wise not to assume that “back office” activities are not affected by sanctions. |
| 3752154f1754-5384-42b6-bd9c-83dcd83be666 | Not Translated (0%) | Something as simple as a supply contract that permits the payment of third parties that were not identified when the agreement was first signed can result in payments being made to a sanctions target. | Something as simple as a supply contract that permits the payment of third parties that were not identified when the agreement was first signed can result in payments being made to a sanctions target. |
| 3753085e0bde-6ed1-43e4-ad01-344444c27f80 | Not Translated (0%) | In regard to suppliers and service parties (both new and existing, including those with whom the business has a longstanding relationship), the following questions should be asked: | In regard to suppliers and service parties (both new and existing, including those with whom the business has a longstanding relationship), the following questions should be asked: |
| 375430df73e0-6195-4f72-a659-22ebcc253142 | Not Translated (0%) | Do they sell to sanctioned countries? | Do they sell to sanctioned countries? |
| 3755ce14f225-043e-4a58-991f-b634fa095981 | Not Translated (0%) | Do they finance in sanctioned countries? | Do they finance in sanctioned countries? |
| 3756ee1e4d46-2898-449c-954e-807c9eacf271 | Not Translated (0%) | Who are the beneficial owners and controllers? | Who are the beneficial owners and controllers? |
| 3757512fbbb8-504a-4521-adad-ba242ceb4d94 | Not Translated (0%) | In what jurisdictions are operations located? | In what jurisdictions are operations located? |
| 3758f0252f1a-92bc-48e0-893a-75993a999cee | Not Translated (0%) | In what jurisdictions are parts and products sourced? | In what jurisdictions are parts and products sourced? |
| 37596b32b93c-5771-4a45-8538-89883dcb3370 | Not Translated (0%) | What are the locations and activities of any subsidiaries? | What are the locations and activities of any subsidiaries? |
| 3760cfe7cd77-4018-4cdf-855b-2a8bc0c72571 | Not Translated (0%) | From what jurisdictions are payments received, paid, and/or processed? | From what jurisdictions are payments received, paid, and/or processed? |
| 376187306cfc-bafe-4de0-a16a-9d6a6348fd94 | Not Translated (0%) | Are any of the officers, directors, controllers, or owners sanctions targets? | Are any of the officers, directors, controllers, or owners sanctions targets? |
| 37627ff9c0bb-76be-4e4b-a8b6-ed1864425324 | Not Translated (0%) | The same scrutiny is necessary for accounts receivable services. | The same scrutiny is necessary for accounts receivable services. |
| 37637ff9c0bb-76be-4e4b-a8b6-ed1864425324 | Not Translated (0%) | The financial institution must understand who is being paid, if those parties have changed since the agreement was signed, where they are located, and where payments are made. | The financial institution must understand who is being paid, if those parties have changed since the agreement was signed, where they are located, and where payments are made. |
| 37647ff9c0bb-76be-4e4b-a8b6-ed1864425324 | Not Translated (0%) | It should confirm that there are no payees who are listed as sanctions targets and that payees do not request payment arrangements that appear to constitute sanctions evasion. | It should confirm that there are no payees who are listed as sanctions targets and that payees do not request payment arrangements that appear to constitute sanctions evasion. |
| 3765a7d5a650-dd5f-4981-8ceb-22655c4badef | Not Translated (0%) | Name Screening vs. Payment Screening | Name Screening vs. Payment Screening |
| 376655a49ed4-9f6c-4615-baae-d41cc4f7187f | Not Translated (0%) | It’s important to understand the differences between name screening and payment screening. | It’s important to understand the differences between name screening and payment screening. |
| 376755a49ed4-9f6c-4615-baae-d41cc4f7187f | Not Translated (0%) | Name screening is the process of matching an internal record (customer, counterparty, related account party) against a sanctioned list record, either manually or through an automated screening tool. | Name screening is the process of matching an internal record (customer, counterparty, related account party) against a sanctioned list record, either manually or through an automated screening tool. |
| 376855a49ed4-9f6c-4615-baae-d41cc4f7187f | Not Translated (0%) | Name screening may also include batch screening, which allows a firm to screen its entire customer base and other entities, such as vendors, using automatic screening tools on a periodic basis. | Name screening may also include batch screening, which allows a firm to screen its entire customer base and other entities, such as vendors, using automatic screening tools on a periodic basis. |
| 376955a49ed4-9f6c-4615-baae-d41cc4f7187f | Not Translated (0%) | When onboarding new customers, sanctions screening is undertaken prior to accepting a new customer relationship, and is done in real time. | When onboarding new customers, sanctions screening is undertaken prior to accepting a new customer relationship, and is done in real time. |
| 377055a49ed4-9f6c-4615-baae-d41cc4f7187f | Not Translated (0%) | Name screening forms a part of entry controls, which gives the financial institution more opportunities to collect sanctions due diligence (SDD) information. | Name screening forms a part of entry controls, which gives the financial institution more opportunities to collect sanctions due diligence (SDD) information. |
| 377155a49ed4-9f6c-4615-baae-d41cc4f7187f | Not Translated (0%) | It is generally more feasible to stop a customer’s onboarding when list screening flags a possible connection between a customer and a sanctions list. | It is generally more feasible to stop a customer’s onboarding when list screening flags a possible connection between a customer and a sanctions list. |
| 3772cc6d864e-0f27-471a-a0c7-029480ae0a5d | Not Translated (0%) | Payment screening focuses of screening payment messages. | Payment screening focuses of screening payment messages. |
| 3773cc6d864e-0f27-471a-a0c7-029480ae0a5d | Not Translated (0%) | Unlike name screening, payment screening takes place with current customers and is performed before a payment or message is processed. | Unlike name screening, payment screening takes place with current customers and is performed before a payment or message is processed. |
| 3774cc6d864e-0f27-471a-a0c7-029480ae0a5d | Not Translated (0%) | Payment screening relies on payment messages using predefined templates, codes, and acronyms to describe certain information. | Payment screening relies on payment messages using predefined templates, codes, and acronyms to describe certain information. |
| 3775cc6d864e-0f27-471a-a0c7-029480ae0a5d | Not Translated (0%) | The information provided in these predefined templates is typically provided by a third party; therefore, the firm has little, if any, control over how the data is presented. | The information provided in these predefined templates is typically provided by a third party; therefore, the firm has little, if any, control over how the data is presented. |
| 37768315bc89-6377-4809-8a11-9d8273a49306 | Not Translated (0%) | Financial institutions are required to freeze or block assets of sanctions targets, and are prohibited from dealing in the funds of a sanctions target. | Financial institutions are required to freeze or block assets of sanctions targets, and are prohibited from dealing in the funds of a sanctions target. |
| 37778315bc89-6377-4809-8a11-9d8273a49306 | Not Translated (0%) | When an institution relies on batch screening for payments, screening is taking place ex-post—after the transaction has been processed. | When an institution relies on batch screening for payments, screening is taking place ex-post—after the transaction has been processed. |
| 37788315bc89-6377-4809-8a11-9d8273a49306 | Not Translated (0%) | This method fails to ensure that the institution stops a payment to a sanctions target. | This method fails to ensure that the institution stops a payment to a sanctions target. |
| 37798315bc89-6377-4809-8a11-9d8273a49306 | Not Translated (0%) | Therefore, from an operational and regulatory expectation, payment screening must take place in real time or ex-ante—before payments are processed. | Therefore, from an operational and regulatory expectation, payment screening must take place in real time or ex-ante—before payments are processed. |
| 37808315bc89-6377-4809-8a11-9d8273a49306 | Not Translated (0%) | This is due to the immediate liability aspect of sanctions. | This is due to the immediate liability aspect of sanctions. |
| 3781710992e8-e4b0-4bb3-bcd7-e45195d954f1 | Not Translated (0%) | Furthermore, the introduction of faster payment processing and other systems means screening payments in real time can be a challenge, especially when a red flag is raised and further inquiry is needed. | Furthermore, the introduction of faster payment processing and other systems means screening payments in real time can be a challenge, especially when a red flag is raised and further inquiry is needed. |
| 3782710992e8-e4b0-4bb3-bcd7-e45195d954f1 | Not Translated (0%) | This is complicated by the fact that there is generally a business requirement to get payment messages processed daily. | This is complicated by the fact that there is generally a business requirement to get payment messages processed daily. |
| 3783710992e8-e4b0-4bb3-bcd7-e45195d954f1 | Not Translated (0%) | A red flag is a fact pattern based on a known activity used to evade regulations or engage in illicit activity. | A red flag is a fact pattern based on a known activity used to evade regulations or engage in illicit activity. |
| 3784710992e8-e4b0-4bb3-bcd7-e45195d954f1 | Not Translated (0%) | Red flags are grouped into typologies, or known techniques for evading regulations and engaging in illicit activity. | Red flags are grouped into typologies, or known techniques for evading regulations and engaging in illicit activity. |
| 3785ccad316c-242a-4555-a5da-6871423c28a6 | Not Translated (0%) | In payment screening, because firms receive information from outside parties, the quality may be beyond a firm’s control. | In payment screening, because firms receive information from outside parties, the quality may be beyond a firm’s control. |
| 3786ccad316c-242a-4555-a5da-6871423c28a6 | Not Translated (0%) | For this reason, it is important to apply human intelligence and judgment to the screening process and to work on, as necessary, the ongoing recalibration of software, data cleaning, and remediation to sustain an effective screening operation. | For this reason, it is important to apply human intelligence and judgment to the screening process and to work on, as necessary, the ongoing recalibration of software, data cleaning, and remediation to sustain an effective screening operation. |
| 37872dcc3c37-0b2c-490c-a8dc-9aafe803be38 | Not Translated (0%) | Information Technology | Information Technology |
| 378868e6e43c-0c36-460e-a95a-8fc7657e58b9 | Not Translated (0%) | Information technology (IT) is a foundational component of a strong sanctions screening program. | Information technology (IT) is a foundational component of a strong sanctions screening program. |
| 378968e6e43c-0c36-460e-a95a-8fc7657e58b9 | Not Translated (0%) | The saying “Garbage in, garbage out” means that the results of screening are only as good as the data feeding the automated screening tools. | The saying “Garbage in, garbage out” means that the results of screening are only as good as the data feeding the automated screening tools. |
| 379068e6e43c-0c36-460e-a95a-8fc7657e58b9 | Not Translated (0%) | The New York State Department of Financial Services | The New York State Department of Financial Services |
| 37916a820046-3776-415b-944c-03eb46de64b8 | Not Translated (0%) | (NYDFS), in its Part 504 requirements, provides guidance concerning data quality and the process used to determine which alerts are generated for review. | (NYDFS), in its Part 504 requirements, provides guidance concerning data quality and the process used to determine which alerts are generated for review. |
| 37926a820046-3776-415b-944c-03eb46de64b8 | Not Translated (0%) | As such, the IT component demands a structured and rigorous approach. | As such, the IT component demands a structured and rigorous approach. |
| 3793396c5490-a18c-4492-aeee-bbfc1ead29b7 | Not Translated (0%) | This section describes automated screening tools; algorithms and tuning; the payment screening process; mapping requirements; data, data flows, and data validation; and operational controls. | This section describes automated screening tools; algorithms and tuning; the payment screening process; mapping requirements; data, data flows, and data validation; and operational controls. |
| 3794d0ae7233-89a2-433e-9794-2f638064f08e | Not Translated (0%) | An important point to remember is that tools are only as good as they are configured. | An important point to remember is that tools are only as good as they are configured. |
| 3795d0ae7233-89a2-433e-9794-2f638064f08e | Not Translated (0%) | Also, it is possible for unscrupulous parties to learn a tool’s limitations. | Also, it is possible for unscrupulous parties to learn a tool’s limitations. |
| 3796d0ae7233-89a2-433e-9794-2f638064f08e | Not Translated (0%) | Financial institutions cannot simply set their automation tools and forget them; they need to be updated regularly to reflect changes, such as new types of sanctions and revised regulations. | Financial institutions cannot simply set their automation tools and forget them; they need to be updated regularly to reflect changes, such as new types of sanctions and revised regulations. |
| 3797d0ae7233-89a2-433e-9794-2f638064f08e | Not Translated (0%) | Effective and ongoing employee training in the use of the tools is also key to their effectiveness, and vendors should supply the organization with updated technical guidance and training as necessary. | Effective and ongoing employee training in the use of the tools is also key to their effectiveness, and vendors should supply the organization with updated technical guidance and training as necessary. |
| 3798b84a80e7-6c33-483c-8a9e-b91a5ce0d99a | Not Translated (0%) | Automated Screening Tools | Automated Screening Tools |
| 379945aa4d77-6769-44a7-9876-336f6b25f4ea | Not Translated (0%) | Large financial institutions often incorporate an automated screening tool (AST) into their screening process. | Large financial institutions often incorporate an automated screening tool (AST) into their screening process. |
| 380045aa4d77-6769-44a7-9876-336f6b25f4ea | Not Translated (0%) | ASTs are software systems used by financial institutions and other firms to facilitate the screening process, as opposed to manual screening. | ASTs are software systems used by financial institutions and other firms to facilitate the screening process, as opposed to manual screening. |
| 380145aa4d77-6769-44a7-9876-336f6b25f4ea | Not Translated (0%) | In general, ASTs are designed to screen against sanctions lists. | In general, ASTs are designed to screen against sanctions lists. |
| 380245aa4d77-6769-44a7-9876-336f6b25f4ea | Not Translated (0%) | ASTs generate hits against sanctions lists that may be consolidated into alerts based on, for example, a customer record. | ASTs generate hits against sanctions lists that may be consolidated into alerts based on, for example, a customer record. |
| 380345aa4d77-6769-44a7-9876-336f6b25f4ea | Not Translated (0%) | For one customer record, there may be multiple hits against sanctions lists that are consolidated under one alert. | For one customer record, there may be multiple hits against sanctions lists that are consolidated under one alert. |
| 38049f757ee5-d24a-4ef9-a5ff-23e3ed8bbae6 | Not Translated (0%) | According to the Wolfsberg Group, a successful sanctions screening program should have a screening application. | According to the Wolfsberg Group, a successful sanctions screening program should have a screening application. |
| 38059f757ee5-d24a-4ef9-a5ff-23e3ed8bbae6 | Not Translated (0%) | While an institution could build its own application internally, it is likely that a large institution will source its application (AST) from a vendor. | While an institution could build its own application internally, it is likely that a large institution will source its application (AST) from a vendor. |
| 38069f757ee5-d24a-4ef9-a5ff-23e3ed8bbae6 | Not Translated (0%) | The institution needs to consider its size, geographic presence, business, and technology environment when choosing an AST vendor. | The institution needs to consider its size, geographic presence, business, and technology environment when choosing an AST vendor. |
| 38079f757ee5-d24a-4ef9-a5ff-23e3ed8bbae6 | Not Translated (0%) | There is no “one size fits all” method for implementing an AST, so an institution should analyze its identified sanctions risks and specific functional requirements. | There is no “one size fits all” method for implementing an AST, so an institution should analyze its identified sanctions risks and specific functional requirements. |
| 3808f0eb4de0-0ca0-4f3e-bda8-a45055a1e9d0 | Not Translated (0%) | Per the “Wolfsberg Guidance on Sanctions Screening,” an institution needs to consider the following from a risk standpoint: | Per the “Wolfsberg Guidance on Sanctions Screening,” an institution needs to consider the following from a risk standpoint: |
| 38095b9d2d29-7cf6-4124-9f17-88facbf48ff8 | Not Translated (0%) | The sophistication and configurability of the matching software | The sophistication and configurability of the matching software |
| 3810f4718633-b990-478a-9c51-aae2ad527e6b | Not Translated (0%) | Availability of screening rules to optimize alert creation/suppression | Availability of screening rules to optimize alert creation/suppression |
| 3811ec4e4fff-bf23-44be-a226-df79aff3e819 | Not Translated (0%) | Support for the screening or transformation of data in non-Latin characters | Support for the screening or transformation of data in non-Latin characters |
| 3812a9571e78-49f7-4649-bd73-ce1fa4a3ee21 | Not Translated (0%) | Ad hoc, one-off, or manual screening functionality | Ad hoc, one-off, or manual screening functionality |
| 3813d1931eed-9c21-4a48-98d1-36ec9fd3ee11 | Not Translated (0%) | Workflow configurability | Workflow configurability |
| 3814b3ef3365-eddb-4665-9477-2e80ea9db8fa | Not Translated (0%) | Availability of metrics reporting | Availability of metrics reporting |
| 381547c3136b-c21c-4384-9183-dd85ff293160 | Not Translated (0%) | From a functional standpoint, consideration should be given to the volume of data to be screened; the support for multiple local installations or a single centralized installation; the existence of, or support for, data integrity processes; and the ability of the application to integrate effectively within a financial institution’s technology infrastructure. | From a functional standpoint, consideration should be given to the volume of data to be screened; the support for multiple local installations or a single centralized installation; the existence of, or support for, data integrity processes; and the ability of the application to integrate effectively within a financial institution’s technology infrastructure. |
| 381675a38037-5422-4164-a537-fd5a45231e12 | Not Translated (0%) | Once risk and functional requirements have been identified, a financial institution should achieve a balance between the standard vendor functionality and configurability of a purchased solution against the cost to build and maintain a more bespoke application internally. | Once risk and functional requirements have been identified, a financial institution should achieve a balance between the standard vendor functionality and configurability of a purchased solution against the cost to build and maintain a more bespoke application internally. |
| 381775a38037-5422-4164-a537-fd5a45231e12 | Not Translated (0%) | It is critical to understand whether sufficient compliance and technology expertise and resources exist within the financial institution or chosen vendor (and will continue to exist) to sustain the design, build, and/or implementation processes, while remaining well-informed on emerging sanctions risks that arise as a result of evolving regulatory frameworks or business expansion and strategy. | It is critical to understand whether sufficient compliance and technology expertise and resources exist within the financial institution or chosen vendor (and will continue to exist) to sustain the design, build, and/or implementation processes, while remaining well-informed on emerging sanctions risks that arise as a result of evolving regulatory frameworks or business expansion and strategy. |
| 38185d8b27b5-7ff9-4684-aa0f-c7e04f7eee55 | Not Translated (0%) | The Wolfsberg Group, “Wolfsberg Guidance on Sanctions Screening,” 2019. | The Wolfsberg Group, “Wolfsberg Guidance on Sanctions Screening,” 2019. |
| 38199136ad68-023a-41f4-be7c-ce685f847fef | Not Translated (0%) | Regulators emphasize the fact that an automated screening tool is just that—a tool. | Regulators emphasize the fact that an automated screening tool is just that—a tool. |
| 38209136ad68-023a-41f4-be7c-ce685f847fef | Not Translated (0%) | ASTs do not completely substitute for a sound understanding about the customer relationship and the expected level of activity and behavior. | ASTs do not completely substitute for a sound understanding about the customer relationship and the expected level of activity and behavior. |
| 38219136ad68-023a-41f4-be7c-ce685f847fef | Not Translated (0%) | Ideally, monitoring should be a combination of both manual and automated screening methods. | Ideally, monitoring should be a combination of both manual and automated screening methods. |
| 38229136ad68-023a-41f4-be7c-ce685f847fef | Not Translated (0%) | compares the benefits and costs associated with automated and manual screening. | compares the benefits and costs associated with automated and manual screening. |
| 3823e81c585b-bfba-4714-a45b-b838fbe9a08c | Not Translated (0%) | Sanctions Monitoring: | Sanctions Monitoring: |
| 3824e81c585b-bfba-4714-a45b-b838fbe9a08c | Not Translated (0%) | Benefits and Costs of Automated vs. Manual Screening | Benefits and Costs of Automated vs. Manual Screening |
| 3825f372cfa8-cd15-4425-9c23-a36ba2cce6ce | Not Translated (0%) | Type of Screening | Type of Screening |
| 3826d0410ae2-84a6-45fd-b5bc-e32d845f2d42 | Not Translated (0%) | Benefits | Benefits |
| 3827bc8d6825-9265-43aa-96dd-7785bab63ba0 | Not Translated (0%) | Costs | Costs |
| 382844700e18-9e6f-4033-92c6-6b1427c79c6b | Not Translated (0%) | Manual | Manual |
| 382974ecedf9-bafa-48d1-9ac5-cc550b03f203 | Not Translated (0%) | Human judgment | Human judgment |
| 383010e525da-f86e-4403-b690-5b9d1c647626 | Not Translated (0%) | Cost-saving (up to a certain volume) | Cost-saving (up to a certain volume) |
| 38315a46251a-69ee-47c6-85d7-2ff2260ae519 | Not Translated (0%) | Human error | Human error |
| 3832c09ca325-aaa6-4699-8839-d30b373422bb | Not Translated (0%) | Resource-intensive | Resource-intensive |
| 3833f7d7ef45-9689-4f6b-bef5-87f17c82ae3e | Not Translated (0%) | Documentation | Documentation |
| 3834a7c1d44b-8e2b-4d6c-becd-e43e908fc4de | Not Translated (0%) | Record retention | Record retention |
| 3835ea8b9a98-03e1-406a-b749-bd0087d104bc | Not Translated (0%) | Automated | Automated |
| 3836aa9630f8-d0cb-497f-bc82-410b2df41796 | Not Translated (0%) | Continuous screening | Continuous screening |
| 3837944ebf93-40c1-44d4-b41a-dfe8bcf8c094 | Not Translated (0%) | Minimizes human error | Minimizes human error |
| 38383ce39c5b-6223-4358-9db3-b09a91edd109 | Not Translated (0%) | Quickly screens documents | Quickly screens documents |
| 38399f85ae42-d6a5-4c3a-82f8-6c38281cc853 | Not Translated (0%) | Case management | Case management |
| 38401a41d7ca-7caa-45e8-a379-5899e87ee4ef | Not Translated (0%) | Familiarity among regulators | Familiarity among regulators |
| 38418a6b106e-cf8d-478a-a90a-62cec4df0476 | Not Translated (0%) | Licensing | Licensing |
| 3842a31f2abf-b399-4793-8a1b-e12538665304 | Not Translated (0%) | Specific training | Specific training |
| 384366d75bcb-42e8-42b3-8bcd-78221cd100b7 | Not Translated (0%) | Calibration of thresholds | Calibration of thresholds |
| 3844d3ecec3b-f82b-4b3f-8789-4d1105e69793 | Not Translated (0%) | False negatives | False negatives |
| 38459250d19b-fb80-4d9d-b553-39f07669f5ed | Not Translated (0%) | Model validation | Model validation |
| 3846740b7720-48cb-4f39-8ed0-7f37dfd5a25f | Not Translated (0%) | There are many different sanctions lists, and targets can be named on more than one list. | There are many different sanctions lists, and targets can be named on more than one list. |
| 3847740b7720-48cb-4f39-8ed0-7f37dfd5a25f | Not Translated (0%) | Most ASTs are designed to allow users to select which lists to screen. | Most ASTs are designed to allow users to select which lists to screen. |
| 3848740b7720-48cb-4f39-8ed0-7f37dfd5a25f | Not Translated (0%) | The following are the lists most commonly used for screening: | The following are the lists most commonly used for screening: |
| 38497f93097b-c41e-4250-a358-2ed8b3580ec9 | Not Translated (0%) | UN Security Council Consolidated Sanctions List | UN Security Council Consolidated Sanctions List |
| 3850da61db81-a172-4ff4-8cac-0648e2be0fcb | Not Translated (0%) | EU Consolidated Financial Sanctions List | EU Consolidated Financial Sanctions List |
| 385138def3e0-c445-4882-a13d-72cc920b2030 | Not Translated (0%) | US Office of Foreign Assets Control (OFAC) Specially Designated Nationals and Blocked Persons List (SDN list) | US Office of Foreign Assets Control (OFAC) Specially Designated Nationals and Blocked Persons List (SDN list) |
| 3852bb71cdb6-e32e-43b8-98f5-e736b49b4097 | Not Translated (0%) | OFAC Non–SDN Palestinian Legislative Council List | OFAC Non–SDN Palestinian Legislative Council List |
| 385352255a8a-9cbb-4757-91d3-f6627f73de2a | Not Translated (0%) | Bureau of Industry and Security (BIS) List of Denied Persons | Bureau of Industry and Security (BIS) List of Denied Persons |
| 38542f9f811e-5f9c-454c-8906-e0fdcbd281e7 | Not Translated (0%) | Financial Action Task Force (FATF) List of High-Risk and Other Monitored Jurisdictions | Financial Action Task Force (FATF) List of High-Risk and Other Monitored Jurisdictions |
| 38552f6d6a1a-0adb-4634-84da-8f6dccfb7c93 | Not Translated (0%) | UK Her Majesty’s (HM) Treasury Consolidated List of Financial Sanctions Targets | UK Her Majesty’s (HM) Treasury Consolidated List of Financial Sanctions Targets |
| 385604cfafa6-aa8d-46e1-83be-b6aae43f24c8 | Not Translated (0%) | Other countries’ lists | Other countries’ lists |
| 3857baf44f88-9022-45ef-9361-098b57279348 | Not Translated (0%) | Moreover, the selection of lists should consider whether a financial institution’s host country has its own autonomous sanctions or equivalent as well as those countries with which the financial institution regularly engages. | Moreover, the selection of lists should consider whether a financial institution’s host country has its own autonomous sanctions or equivalent as well as those countries with which the financial institution regularly engages. |
| 385872f8b7ee-9eea-48d6-ad37-e17dab9e7b61 | Not Translated (0%) | Another set of controls is the “inequalities” list, which is compiled by financial organizations, as opposed to outside vendors. | Another set of controls is the “inequalities” list, which is compiled by financial organizations, as opposed to outside vendors. |
| 385972f8b7ee-9eea-48d6-ad37-e17dab9e7b61 | Not Translated (0%) | The purpose of this list is to limit the number of parties that might be identified as possible matches to names on sanctions lists. | The purpose of this list is to limit the number of parties that might be identified as possible matches to names on sanctions lists. |
| 386072f8b7ee-9eea-48d6-ad37-e17dab9e7b61 | Not Translated (0%) | Once flagged and classified as false positive data, the AST should suppress future hits based on similar data. | Once flagged and classified as false positive data, the AST should suppress future hits based on similar data. |
| 3861ff133c12-17a5-4d0c-bf55-2d941de2ef0c | Not Translated (0%) | An inequalities list is a list of words or names that automated screening tools often mistake as matches and thereby create potential matches to targets named on sanctions lists. | An inequalities list is a list of words or names that automated screening tools often mistake as matches and thereby create potential matches to targets named on sanctions lists. |
| 3862ff133c12-17a5-4d0c-bf55-2d941de2ef0c | Not Translated (0%) | These are words or names that the organization’s compliance team has checked and confirmed do not actually match up with a target’s record on a sanctions list, such as Andrew and Andrea. | These are words or names that the organization’s compliance team has checked and confirmed do not actually match up with a target’s record on a sanctions list, such as Andrew and Andrea. |
| 3863ff133c12-17a5-4d0c-bf55-2d941de2ef0c | Not Translated (0%) | An addition to an inequalities list will apply the inequality to all future screened instances and decrease the likelihood of a future match. | An addition to an inequalities list will apply the inequality to all future screened instances and decrease the likelihood of a future match. |
| 3864ff133c12-17a5-4d0c-bf55-2d941de2ef0c | Not Translated (0%) | Therefore, inequalities lists should have sufficient controls (at least dual controls) for additions to the list and periodic review. | Therefore, inequalities lists should have sufficient controls (at least dual controls) for additions to the list and periodic review. |
| 3865ff133c12-17a5-4d0c-bf55-2d941de2ef0c | Not Translated (0%) | In the above example, having Andrew and Andrea may be fine when screening against static customer data where the data quality is generally better. | In the above example, having Andrew and Andrea may be fine when screening against static customer data where the data quality is generally better. |
| 3866ff133c12-17a5-4d0c-bf55-2d941de2ef0c | Not Translated (0%) | However, for payment screening, Andrew and Andrea may easily be the result of a typo by a third party and may therefore unintentionally exclude potential matches. | However, for payment screening, Andrew and Andrea may easily be the result of a typo by a third party and may therefore unintentionally exclude potential matches. |
| 3867ff133c12-17a5-4d0c-bf55-2d941de2ef0c | Not Translated (0%) | For this reason, dual controls and periodic reviews are important. | For this reason, dual controls and periodic reviews are important. |
| 38680e7d5b7b-0bea-4ccc-b03d-8a395f28baaf | Not Translated (0%) | Fine-Tuning Screening Algorithms | Fine-Tuning Screening Algorithms |
| 3869edef22e2-5334-4714-b23c-287e69130566 | Not Translated (0%) | The key to effective screening is the coding used by the AST to detect possible matches. | The key to effective screening is the coding used by the AST to detect possible matches. |
| 3870edef22e2-5334-4714-b23c-287e69130566 | Not Translated (0%) | ASTs use a mix of fuzzy logic, algorithms, and scenarios to do this. | ASTs use a mix of fuzzy logic, algorithms, and scenarios to do this. |
| 387102bca434-0ca6-4762-a611-13d2d3af0397 | Not Translated (0%) | FUZZY LOGIC AND PARTIAL MATCHING | FUZZY LOGIC AND PARTIAL MATCHING |
| 3872bf7bbfc5-9515-4a29-921b-3603adf31c89 | Not Translated (0%) | Sanctions targets often use different names to evade detection. | Sanctions targets often use different names to evade detection. |
| 3873bf7bbfc5-9515-4a29-921b-3603adf31c89 | Not Translated (0%) | Sometimes the challenge of screening parties against sanctions lists is compounded by a financial institution’s flawed records and databases. | Sometimes the challenge of screening parties against sanctions lists is compounded by a financial institution’s flawed records and databases. |
| 3874bf7bbfc5-9515-4a29-921b-3603adf31c89 | Not Translated (0%) | Two techniques that help overcome this problem are the use of fuzzy logic and partial matching. | Two techniques that help overcome this problem are the use of fuzzy logic and partial matching. |
| 3875db0e62e0-9cc1-488d-9af3-7ecdafb8f91e | Not Translated (0%) | Fuzzy logic is a matching technique used by financial institutions to increase the effectiveness of screening processes by overcoming problems such as flawed records and databases. | Fuzzy logic is a matching technique used by financial institutions to increase the effectiveness of screening processes by overcoming problems such as flawed records and databases. |
| 3876db0e62e0-9cc1-488d-9af3-7ecdafb8f91e | Not Translated (0%) | This technique is accomplished through algorithms that use “degrees of similarity” to determine the probability that two names are the same. | This technique is accomplished through algorithms that use “degrees of similarity” to determine the probability that two names are the same. |
| 3877db0e62e0-9cc1-488d-9af3-7ecdafb8f91e | Not Translated (0%) | Fuzzy logic can find matches in misspelled names, incomplete names, and names with different spellings but similar sounds or phonetics. | Fuzzy logic can find matches in misspelled names, incomplete names, and names with different spellings but similar sounds or phonetics. |
| 3878db0e62e0-9cc1-488d-9af3-7ecdafb8f91e | Not Translated (0%) | In addition, fuzzy logic accepts different formats for date of birth and other inconsistencies. | In addition, fuzzy logic accepts different formats for date of birth and other inconsistencies. |
| 3879db0e62e0-9cc1-488d-9af3-7ecdafb8f91e | Not Translated (0%) | Although fuzzy logic increases the likelihood of identifying potential target matches, it can also increase the number of false positives. | Although fuzzy logic increases the likelihood of identifying potential target matches, it can also increase the number of false positives. |
| 38808cd24eff-82d6-4a5a-bb38-0e0a6e473e44 | Not Translated (0%) | It’s important to note that regulators expect that ASTs used for sanctions screening apply fuzzy logic. | It’s important to note that regulators expect that ASTs used for sanctions screening apply fuzzy logic. |
| 38818cd24eff-82d6-4a5a-bb38-0e0a6e473e44 | Not Translated (0%) | Fuzzy logic is accomplished through several common algorithms, including: | Fuzzy logic is accomplished through several common algorithms, including: |
| 38827114c0ee-f512-40b5-a99c-3b7b2ecb067f | Not Translated (0%) | Phonetic: | Phonetic: |
| 38837114c0ee-f512-40b5-a99c-3b7b2ecb067f | Not Translated (0%) | This method reduces names to a key or code based on their pronunciation, so that similar sounding names share the same key. | This method reduces names to a key or code based on their pronunciation, so that similar sounding names share the same key. |
| 38847114c0ee-f512-40b5-a99c-3b7b2ecb067f | Not Translated (0%) | An example is “Bougourd” and “Bugourd.” | An example is “Bougourd” and “Bugourd.” |
| 3885d1acc4ba-dffd-4333-8c67-f4fe2649f084 | Not Translated (0%) | Edit Distance or Levenshtein: | Edit Distance or Levenshtein: |
| 3886d1acc4ba-dffd-4333-8c67-f4fe2649f084 | Not Translated (0%) | This method examines how many character changes it takes to get from one name to another. | This method examines how many character changes it takes to get from one name to another. |
| 3887d1acc4ba-dffd-4333-8c67-f4fe2649f084 | Not Translated (0%) | For example, “Timmy” and “Tymmi” have an edit distance of 1 since “i” and “y” are merely transposed. | For example, “Timmy” and “Tymmi” have an edit distance of 1 since “i” and “y” are merely transposed. |
| 388864cb0719-3d0d-43ef-a379-5fca1efb9061 | Not Translated (0%) | Equivalence and Non-Equivalence: | Equivalence and Non-Equivalence: |
| 388964cb0719-3d0d-43ef-a379-5fca1efb9061 | Not Translated (0%) | This method teaches the system through human feedback which similarities are equivalent and non-equivalent. | This method teaches the system through human feedback which similarities are equivalent and non-equivalent. |
| 389064cb0719-3d0d-43ef-a379-5fca1efb9061 | Not Translated (0%) | Some systems have equivalence and non-equivalence built in or sourced from a group of users. | Some systems have equivalence and non-equivalence built in or sourced from a group of users. |
| 389164cb0719-3d0d-43ef-a379-5fca1efb9061 | Not Translated (0%) | In one example of equivalence, “Gaddafi,” “Kaddafi,” and “Qadhafi” would all be treated as equivalent. | In one example of equivalence, “Gaddafi,” “Kaddafi,” and “Qadhafi” would all be treated as equivalent. |
| 389264cb0719-3d0d-43ef-a379-5fca1efb9061 | Not Translated (0%) | In an example of non-equivalence, the actor “Cuba Gooding, Jr.” and the address “Avenida Cuba y Calle 38 Este Numbero” would not trigger a sanctions hit on the country “Cuba.” | In an example of non-equivalence, the actor “Cuba Gooding, Jr.” and the address “Avenida Cuba y Calle 38 Este Numbero” would not trigger a sanctions hit on the country “Cuba.” |
| 389364cb0719-3d0d-43ef-a379-5fca1efb9061 | Not Translated (0%) | (Also see inequalities list.) | (Also see inequalities list.) |
| 38941c9157ea-31a5-4c57-858b-caadefbef813 | Not Translated (0%) | Even when an automated tool is not available, organizations adopt a “fuzzy logic” approach when manually screening customers through the use of human intuition. | Even when an automated tool is not available, organizations adopt a “fuzzy logic” approach when manually screening customers through the use of human intuition. |
| 38951c9157ea-31a5-4c57-858b-caadefbef813 | Not Translated (0%) | For example, if news reports were to refer to US President Donald Trump as just “the Donald,” “Don Trump,” or some other nickname (i.e., a shortened or familiar name), most listeners understand this refers to Donald Trump and not some other Donald or Don. | For example, if news reports were to refer to US President Donald Trump as just “the Donald,” “Don Trump,” or some other nickname (i.e., a shortened or familiar name), most listeners understand this refers to Donald Trump and not some other Donald or Don. |
| 38961c9157ea-31a5-4c57-858b-caadefbef813 | Not Translated (0%) | In fact, fuzzy logic is the coding of human experience into a repeatable algorithm. | In fact, fuzzy logic is the coding of human experience into a repeatable algorithm. |
| 38971c9157ea-31a5-4c57-858b-caadefbef813 | Not Translated (0%) | As such, it is only as good as the underlying design and ongoing feedback that it receives. | As such, it is only as good as the underlying design and ongoing feedback that it receives. |
| 38981dfdd546-9b12-4adb-829b-c8449f025013 | Not Translated (0%) | When a firm’s AST generates a result based on fuzzy logic, it is often presented as a partial match, meaning the entity being screened is similar enough to the sanctioned entity based on fuzzy logic and potentially other identifying factors, such as date of birth. | When a firm’s AST generates a result based on fuzzy logic, it is often presented as a partial match, meaning the entity being screened is similar enough to the sanctioned entity based on fuzzy logic and potentially other identifying factors, such as date of birth. |
| 38991dfdd546-9b12-4adb-829b-c8449f025013 | Not Translated (0%) | Partial matches require further human intervention to determine whether the match is a target match (or true match), i.e., the name being screened is the same entity as the sanctioned target. | Partial matches require further human intervention to determine whether the match is a target match (or true match), i.e., the name being screened is the same entity as the sanctioned target. |
| 390035a62387-013a-43b2-8bc8-c1820f5f7bd8 | Not Translated (0%) | COMMON ALGORITHMS | COMMON ALGORITHMS |
| 390126b97713-a6b5-4c9c-b7dc-6073782786ee | Not Translated (0%) | Algorithms are essentially the “brains” of an AST. | Algorithms are essentially the “brains” of an AST. |
| 390226b97713-a6b5-4c9c-b7dc-6073782786ee | Not Translated (0%) | They combine several search methods and assign a weighting or a possible match to a sanctions target named on a list. | They combine several search methods and assign a weighting or a possible match to a sanctions target named on a list. |
| 390326b97713-a6b5-4c9c-b7dc-6073782786ee | Not Translated (0%) | In general, the results are produced showing a weighting score between 0 and 50. | In general, the results are produced showing a weighting score between 0 and 50. |
| 390426b97713-a6b5-4c9c-b7dc-6073782786ee | Not Translated (0%) | The calibration setting of ASTs can have an impact upon the number of hits generated. | The calibration setting of ASTs can have an impact upon the number of hits generated. |
| 390527c3263e-95fe-49a4-a6a4-3a2c39c2a8b8 | Not Translated (0%) | It’s important to note that the results generated by an AST can include several alerts about the same sanctions target; this occurs when the same sanctions target appears on more than one list and/or when there are several elements within a payment message that match the algorithms set in the AST. | It’s important to note that the results generated by an AST can include several alerts about the same sanctions target; this occurs when the same sanctions target appears on more than one list and/or when there are several elements within a payment message that match the algorithms set in the AST. |
| 3906e92de132-094e-4b68-a577-b54d7444fe69 | Not Translated (0%) | Examples of some of the basic algorithms used by most ASTs include noisy or neutral words, common words, and surnames vs. forenames. | Examples of some of the basic algorithms used by most ASTs include noisy or neutral words, common words, and surnames vs. forenames. |
| 3907af01b017-6eeb-44d0-9213-0335ed05bc60 | Not Translated (0%) | Noisy or Neutral Words | Noisy or Neutral Words |
| 390840a73322-8fa7-4c3f-abef-dd00b8601d53 | Not Translated (0%) | Noisy, or neutral, words are words used frequently, such as “the,” “and,” and “of.” | Noisy, or neutral, words are words used frequently, such as “the,” “and,” and “of.” |
| 390940a73322-8fa7-4c3f-abef-dd00b8601d53 | Not Translated (0%) | An AST will allocate a lower weighting or even disregard these words when screening names. | An AST will allocate a lower weighting or even disregard these words when screening names. |
| 391040a73322-8fa7-4c3f-abef-dd00b8601d53 | Not Translated (0%) | The noisy algorithm also ensures that possible matches are not dismissed because of a slight variation in the use of these types of words. | The noisy algorithm also ensures that possible matches are not dismissed because of a slight variation in the use of these types of words. |
| 391103925757-9f03-4dcc-8e83-bfd12a41dc99 | Not Translated (0%) | Common Words | Common Words |
| 391240176729-5e40-4fd7-b804-40c49b149b66 | Not Translated (0%) | Another algorithm, common words, relates to the weighting or importance given to common words that appear to match those on a sanctions list. | Another algorithm, common words, relates to the weighting or importance given to common words that appear to match those on a sanctions list. |
| 391340176729-5e40-4fd7-b804-40c49b149b66 | Not Translated (0%) | This algorithm is used for the same reason as eliminating the noisy words. | This algorithm is used for the same reason as eliminating the noisy words. |
| 391440176729-5e40-4fd7-b804-40c49b149b66 | Not Translated (0%) | An example of the common words algorithm is “National Bank of Sudan” vs. “National Bank of Iceland”—the words “National bank of” would be given a low weighting. | An example of the common words algorithm is “National Bank of Sudan” vs. “National Bank of Iceland”—the words “National bank of” would be given a low weighting. |
| 3915e1f172f5-9992-4caa-8477-cb4686b88c06 | Not Translated (0%) | Surnames vs. Forenames | Surnames vs. Forenames |
| 3916d64124a3-c9a3-4022-bef3-6955c693e958 | Not Translated (0%) | With the surnames vs. forenames algorithm, an AST applies more weight to last names, or surnames, than to first names, or forenames. | With the surnames vs. forenames algorithm, an AST applies more weight to last names, or surnames, than to first names, or forenames. |
| 3917d64124a3-c9a3-4022-bef3-6955c693e958 | Not Translated (0%) | This technique reduces the risk of a target being missed or not detected by an AST simply because of the spelling of the first name (e.g., Jean Luc Pickard vs. Gean Luc Pickard vs. J.L. | This technique reduces the risk of a target being missed or not detected by an AST simply because of the spelling of the first name (e.g., Jean Luc Pickard vs. Gean Luc Pickard vs. J.L. |
| 3918d64124a3-c9a3-4022-bef3-6955c693e958 | Not Translated (0%) | Pickard). | Pickard). |
| 3919d64124a3-c9a3-4022-bef3-6955c693e958 | Not Translated (0%) | This method may be more applicable to Western names, however, because there are cultural differences in how names are written. | This method may be more applicable to Western names, however, because there are cultural differences in how names are written. |
| 3920cf362505-e4c0-4f38-b2aa-a671edd8003d | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 3921cf362505-e4c0-4f38-b2aa-a671edd8003d | Not Translated (0%) | CITIGROUP, 2014 | CITIGROUP, 2014 |
| 3922fa69bbfb-624c-40f9-ae0c-2b0a0fb068cd | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 3923c0fd7dd1-7154-4d14-8812-eeeff5d2810c | Not Translated (0%) | In 2014, Citigroup settled potential civil liability with OFAC for, in part, failing to accurately identify a sanctions target. | In 2014, Citigroup settled potential civil liability with OFAC for, in part, failing to accurately identify a sanctions target. |
| 3924c0fd7dd1-7154-4d14-8812-eeeff5d2810c | Not Translated (0%) | Its screening tool missed the similarity between the words “for” and “of.” | Its screening tool missed the similarity between the words “for” and “of.” |
| 3925c0fd7dd1-7154-4d14-8812-eeeff5d2810c | Not Translated (0%) | Citigroup had processed a payment to the Higher Institute OF Applied Sciences, based in Syria. | Citigroup had processed a payment to the Higher Institute OF Applied Sciences, based in Syria. |
| 3926c0fd7dd1-7154-4d14-8812-eeeff5d2810c | Not Translated (0%) | When the payment message was received, the name of the recipient was identified as the Higher Institute FOR Applied Science. | When the payment message was received, the name of the recipient was identified as the Higher Institute FOR Applied Science. |
| 39275f6989e8-40a6-4323-8ad8-b45d829ec00d | Not Translated (0%) | The bank’s AST screening tool failed to identify the name as a possible match and did not generate an alert. | The bank’s AST screening tool failed to identify the name as a possible match and did not generate an alert. |
| 39285f6989e8-40a6-4323-8ad8-b45d829ec00d | Not Translated (0%) | The transactions were processed without manual intervention, and Citigroup did not voluntarily disclose these apparent violations. | The transactions were processed without manual intervention, and Citigroup did not voluntarily disclose these apparent violations. |
| 3929241a963d-14f5-4c35-a2f9-57bcccb2ae99 | Not Translated (0%) | “Citigroup in OFAC settlement,” Bankers Online, September 4, 2014. | “Citigroup in OFAC settlement,” Bankers Online, September 4, 2014. |
| 3930402fcd91-0a1d-4271-9303-459a2042da44 | Not Translated (0%) | , | , |
| 39318fc92355-81fa-4b64-b95a-fd09e9fcd930 | Not Translated (0%) | “Citigroup settles potential liability for Iran-related and Kingpin-related transactions resulting from screening failures,” Lexology, September 15, 2014. | “Citigroup settles potential liability for Iran-related and Kingpin-related transactions resulting from screening failures,” Lexology, September 15, 2014. |
| 39329cc4500b-54b7-4962-bab6-be338c6de071 | Not Translated (0%) | , | , |
| 393317d50ced-a475-4254-b9a5-5f222f485bc1 | Not Translated (0%) | US Department of the Treasury, Enforcement Information for September 3, 2014. | US Department of the Treasury, Enforcement Information for September 3, 2014. |
| 39343110dd0d-1998-41a0-8edd-17baa22f225b | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 3935b302f963-7158-4303-b74f-e41b04ecf444 | Not Translated (0%) | It is critical for an organization to effectively calibrate its screening tools so that they would search for both “for” and “of,” and not exclude either one or the other. | It is critical for an organization to effectively calibrate its screening tools so that they would search for both “for” and “of,” and not exclude either one or the other. |
| 3936310a76ed-731f-4e0d-b1bf-7d0d168d9b59 | Not Translated (0%) | When onboarding a technology solution, an organization should ensure it has good test examples to use on the algorithms to make sure the system is effectively mitigating its sanctions risk exposure. | When onboarding a technology solution, an organization should ensure it has good test examples to use on the algorithms to make sure the system is effectively mitigating its sanctions risk exposure. |
| 3937d40579b9-5ba5-4c2c-9edb-6e82b86ce7a8 | Not Translated (0%) | The tool should be recalibrated regularly in order to update the systems based on lessons learned from individual cases. | The tool should be recalibrated regularly in order to update the systems based on lessons learned from individual cases. |
| 39388221b89a-6fef-45c0-8af6-0a64cefdb7a0 | Not Translated (0%) | Other Algorithms | Other Algorithms |
| 3939a4642cb7-57b0-45cd-8f0a-80b2fb20cc1f | Not Translated (0%) | Glued and split words: | Glued and split words: |
| 3940a4642cb7-57b0-45cd-8f0a-80b2fb20cc1f | Not Translated (0%) | This algorithm pertains to “joined up” or “glued” words (also known as concatenated), and their opposites, “split words.” | This algorithm pertains to “joined up” or “glued” words (also known as concatenated), and their opposites, “split words.” |
| 3941a4642cb7-57b0-45cd-8f0a-80b2fb20cc1f | Not Translated (0%) | For glued words, these algorithms are designed to address the problem of key terms like “Iran” being combined with innocuous terms like “transaction” to decrease the degree of overlap with a list. | For glued words, these algorithms are designed to address the problem of key terms like “Iran” being combined with innocuous terms like “transaction” to decrease the degree of overlap with a list. |
| 3942a4642cb7-57b0-45cd-8f0a-80b2fb20cc1f | Not Translated (0%) | For example, when comparing the term “Iran” to “Iran” there is 100% overlap, but when comparing “irantransaction” to “Iran,” the degree of overlap decreases. | For example, when comparing the term “Iran” to “Iran” there is 100% overlap, but when comparing “irantransaction” to “Iran,” the degree of overlap decreases. |
| 3943a4642cb7-57b0-45cd-8f0a-80b2fb20cc1f | Not Translated (0%) | For “split words” the algorithms are important to help detect evasion attempts in which sanctions targets intentionally add spaces to their names or other key terms. | For “split words” the algorithms are important to help detect evasion attempts in which sanctions targets intentionally add spaces to their names or other key terms. |
| 3944a4642cb7-57b0-45cd-8f0a-80b2fb20cc1f | Not Translated (0%) | An example of this is the surname “Newman.” | An example of this is the surname “Newman.” |
| 3945a4642cb7-57b0-45cd-8f0a-80b2fb20cc1f | Not Translated (0%) | If a space is added it becomes two innocuous words, “new” and “man.” | If a space is added it becomes two innocuous words, “new” and “man.” |
| 394604f2bd37-eab9-47fd-9a00-e6265156d9a5 | Not Translated (0%) | Word order swapping and omitted names: | Word order swapping and omitted names: |
| 394704f2bd37-eab9-47fd-9a00-e6265156d9a5 | Not Translated (0%) | There are also algorithms to address word order swapping; that is, when the words are ordered in different ways—whether using correct or altered names—such as with “Bank Sudan National” vs. “National Bank of Sudan.” | There are also algorithms to address word order swapping; that is, when the words are ordered in different ways—whether using correct or altered names—such as with “Bank Sudan National” vs. “National Bank of Sudan.” |
| 394804f2bd37-eab9-47fd-9a00-e6265156d9a5 | Not Translated (0%) | Swapping names is often due to the format of the database in which names are entered, or it can be caused by a lack of knowledge about cultural naming conventions. | Swapping names is often due to the format of the database in which names are entered, or it can be caused by a lack of knowledge about cultural naming conventions. |
| 39496ea04a70-b97b-4fdb-9e88-f1a0fb89c506 | Not Translated (0%) | Missing names: | Missing names: |
| 39506ea04a70-b97b-4fdb-9e88-f1a0fb89c506 | Not Translated (0%) | The algorithm designed to address missing names or parts of names works in a similar way to the algorithms that handle glued and split words. | The algorithm designed to address missing names or parts of names works in a similar way to the algorithms that handle glued and split words. |
| 39516ea04a70-b97b-4fdb-9e88-f1a0fb89c506 | Not Translated (0%) | It would capture, for example, “Abdullah Al-Ashqar” when “Abdullah Bin Hassan Al Ashqar” is the full name. | It would capture, for example, “Abdullah Al-Ashqar” when “Abdullah Bin Hassan Al Ashqar” is the full name. |
| 3952e8c6ba4c-44a7-4aee-9b8e-a25d690b8f52 | Not Translated (0%) | UPDATING ALGORITHMS AND CALIBRATING THRESHOLDS | UPDATING ALGORITHMS AND CALIBRATING THRESHOLDS |
| 3953f905001d-5395-4954-8a01-84c304e5b3b7 | Not Translated (0%) | ASTs use interdiction software to match parties in a financial institution’s databases to names on sanctions lists in order to stop, or interdict, the processing of transactions until a match is resolved. | ASTs use interdiction software to match parties in a financial institution’s databases to names on sanctions lists in order to stop, or interdict, the processing of transactions until a match is resolved. |
| 3954f905001d-5395-4954-8a01-84c304e5b3b7 | Not Translated (0%) | The software uses threshold calibration to determine which alerts to generate. | The software uses threshold calibration to determine which alerts to generate. |
| 39550cb01733-df7f-4cd4-8ccf-ea4bcbe63ecd | Not Translated (0%) | A threshold is typically described in terms of a percentage of a match to a particular algorithm or scenario. | A threshold is typically described in terms of a percentage of a match to a particular algorithm or scenario. |
| 39560cb01733-df7f-4cd4-8ccf-ea4bcbe63ecd | Not Translated (0%) | If the percentage is set too high, for example, only a few names will match. | If the percentage is set too high, for example, only a few names will match. |
| 39570cb01733-df7f-4cd4-8ccf-ea4bcbe63ecd | Not Translated (0%) | This increases the potential occurrence of false negatives, which describes screened activity that would have generated a hit had the screening process been calibrated to catch such activity, but instead the possible alerts are dismissed, causing the institution to miss a match to a target named on a sanctions list. | This increases the potential occurrence of false negatives, which describes screened activity that would have generated a hit had the screening process been calibrated to catch such activity, but instead the possible alerts are dismissed, causing the institution to miss a match to a target named on a sanctions list. |
| 395895807eeb-4a96-4485-a09b-21ec9587e85a | Not Translated (0%) | If the threshold percentage is too low, the tool will produce an excess of results, many of which will be false positives, or hits identified during the screening process as possible matches, but when reviewed, are found not to be a match to a target named on a sanctions list. | If the threshold percentage is too low, the tool will produce an excess of results, many of which will be false positives, or hits identified during the screening process as possible matches, but when reviewed, are found not to be a match to a target named on a sanctions list. |
| 395995807eeb-4a96-4485-a09b-21ec9587e85a | Not Translated (0%) | An overabundance of false positives leads to the inefficient use of resources due to the large number of hits that need to be checked against sanctions lists. | An overabundance of false positives leads to the inefficient use of resources due to the large number of hits that need to be checked against sanctions lists. |
| 39606e511c5b-1d6d-47eb-87db-238939bfa390 | Not Translated (0%) | In order to set the tool’s threshold correctly, the business needs to understand the tool and know the institution’s greatest areas of sanctions risk. | In order to set the tool’s threshold correctly, the business needs to understand the tool and know the institution’s greatest areas of sanctions risk. |
| 39616e511c5b-1d6d-47eb-87db-238939bfa390 | Not Translated (0%) | It is best for an organization to base its thresholds on the level of control it has over the data. | It is best for an organization to base its thresholds on the level of control it has over the data. |
| 39626e511c5b-1d6d-47eb-87db-238939bfa390 | Not Translated (0%) | For example, for screening its customer base, the organization may have high-quality data and thus firm control over its data; in this case, the thresholds would be set higher. | For example, for screening its customer base, the organization may have high-quality data and thus firm control over its data; in this case, the thresholds would be set higher. |
| 39636e511c5b-1d6d-47eb-87db-238939bfa390 | Not Translated (0%) | However, when an organization’s screening data is provided by a third party, such as a wire transfer, it is best to establish lower thresholds to account for human error, differing institutional standards, and other external variances over which it has no or little control. | However, when an organization’s screening data is provided by a third party, such as a wire transfer, it is best to establish lower thresholds to account for human error, differing institutional standards, and other external variances over which it has no or little control. |
| 3964916aa1ec-5284-4b26-9303-cd3284af2a5a | Not Translated (0%) | Algorithms must be updated and reconfigured as external information becomes available, as the institution’s internal investigations reveal new trends, and as financial crime activity develops and changes over time. | Algorithms must be updated and reconfigured as external information becomes available, as the institution’s internal investigations reveal new trends, and as financial crime activity develops and changes over time. |
| 3965916aa1ec-5284-4b26-9303-cd3284af2a5a | Not Translated (0%) | Regular interaction with vendors is key so that the system is using the most up-to-date technology available to manage its sanctions risk exposure. | Regular interaction with vendors is key so that the system is using the most up-to-date technology available to manage its sanctions risk exposure. |
| 396630855fd0-880d-4ec1-b306-a911166ff97b | Not Translated (0%) | Importantly, calibration requires documentation. | Importantly, calibration requires documentation. |
| 396730855fd0-880d-4ec1-b306-a911166ff97b | Not Translated (0%) | Changes to the model, testing of thresholds, and results all should be thoroughly documented. | Changes to the model, testing of thresholds, and results all should be thoroughly documented. |
| 396830855fd0-880d-4ec1-b306-a911166ff97b | Not Translated (0%) | In addition, it is important to remember that screening tools facilitate, but do not replace, the human analysis required to determine whether a true match has been identified. | In addition, it is important to remember that screening tools facilitate, but do not replace, the human analysis required to determine whether a true match has been identified. |
| 396920fdd7c7-3dbd-4693-b8ad-e8a45401cd95 | Not Translated (0%) | Scenarios | Scenarios |
| 397023c2467a-2017-40e3-8a12-66394b383a0c | Not Translated (0%) | A scenario is a set of rules or models that reflect known sanctions typologies or ways in which sanctions violations occur. | A scenario is a set of rules or models that reflect known sanctions typologies or ways in which sanctions violations occur. |
| 397123c2467a-2017-40e3-8a12-66394b383a0c | Not Translated (0%) | Scenarios are identified through: | Scenarios are identified through: |
| 3972e205a6bd-ae27-49e5-b142-a6c42b2b661f | Not Translated (0%) | Industry sources, such as FATF and FATF-Style Regional Bodies (FSRBs) | Industry sources, such as FATF and FATF-Style Regional Bodies (FSRBs) |
| 39737ef5d4e7-eb6c-46f8-a8c4-5347ab4c7864 | Not Translated (0%) | An organization’s sanctions risk assessment results | An organization’s sanctions risk assessment results |
| 3974c60ac734-3d71-41d0-a47e-ec562e335245 | Not Translated (0%) | Historical detection indicators, such as previous positive hits and true matches generated during the sanctions screening process | Historical detection indicators, such as previous positive hits and true matches generated during the sanctions screening process |
| 3975239beceb-9b70-4a70-bb70-789b005913a8 | Not Translated (0%) | Scenarios enhance an AST’s ability to detect possible sanctions violations specific to an organization. | Scenarios enhance an AST’s ability to detect possible sanctions violations specific to an organization. |
| 3976239beceb-9b70-4a70-bb70-789b005913a8 | Not Translated (0%) | Scenarios can help to detect red flags such as: | Scenarios can help to detect red flags such as: |
| 397760ac07ab-d036-49a3-841c-b876696ad40e | Not Translated (0%) | Using the financial institution’s address in payment message fields where the customer’s address should be disclosed | Using the financial institution’s address in payment message fields where the customer’s address should be disclosed |
| 3978be33cf86-59c5-4f4e-988f-a7ced3b9e50d | Not Translated (0%) | Resubmitting payment messages that were previously rejected, but removing or altering information | Resubmitting payment messages that were previously rejected, but removing or altering information |
| 39793504313f-8718-430c-8195-3df9878a4c38 | Not Translated (0%) | Submitting payment messages that include multiple, unrelated customers with the same physical address | Submitting payment messages that include multiple, unrelated customers with the same physical address |
| 3980c622de0d-d944-4168-be37-321eb2fd686a | Not Translated (0%) | Scenarios should be based on actual historical data, similar to the examples above. | Scenarios should be based on actual historical data, similar to the examples above. |
| 3981475ec44c-056b-44ff-8875-d112084c9fa5 | Not Translated (0%) | Note that ASTs typically include several standard scenarios to use in screening; however, to use the tool effectively, organizations should develop original scenarios tailored to their specific business to help identify sanctions risks that are realistic and consistent with their experience. | Note that ASTs typically include several standard scenarios to use in screening; however, to use the tool effectively, organizations should develop original scenarios tailored to their specific business to help identify sanctions risks that are realistic and consistent with their experience. |
| 3982475ec44c-056b-44ff-8875-d112084c9fa5 | Not Translated (0%) | Once developed, the organization can use a testing period to verify whether the scenarios generate hits that reflect sanctions risks specific to its business. | Once developed, the organization can use a testing period to verify whether the scenarios generate hits that reflect sanctions risks specific to its business. |
| 39830c5ccfcd-f63f-494c-9232-710f0e60e231 | Not Translated (0%) | Understanding Mapping Requirements | Understanding Mapping Requirements |
| 3984ce50aaa8-338c-4deb-aee9-dabded9e3ff8 | Not Translated (0%) | In addition to determining how alerts are being generated using fuzzy logic, it is vitally important to determine how the various systems and databases within a firm are mapped or connected to the AST. | In addition to determining how alerts are being generated using fuzzy logic, it is vitally important to determine how the various systems and databases within a firm are mapped or connected to the AST. |
| 3985ce50aaa8-338c-4deb-aee9-dabded9e3ff8 | Not Translated (0%) | Payment messages contain many fields of information, and the information in each field is unique to that field. | Payment messages contain many fields of information, and the information in each field is unique to that field. |
| 3986ce50aaa8-338c-4deb-aee9-dabded9e3ff8 | Not Translated (0%) | ASTs may require mapping from the SWIFT (or other type of message) to the AST to ensure the AST is using the proper methods for screening. | ASTs may require mapping from the SWIFT (or other type of message) to the AST to ensure the AST is using the proper methods for screening. |
| 3987ce50aaa8-338c-4deb-aee9-dabded9e3ff8 | Not Translated (0%) | For example, some fields only contain | For example, some fields only contain |
| 3988e5426b30-27ec-4aa0-9a9a-2c0caf143431 | Not Translated (0%) | Bank Identification Codes (BIC); therefore, screening this field against the entirety of the OFAC list with its acronyms would generate numerous false positives. | Bank Identification Codes (BIC); therefore, screening this field against the entirety of the OFAC list with its acronyms would generate numerous false positives. |
| 3989e5426b30-27ec-4aa0-9a9a-2c0caf143431 | Not Translated (0%) | With proper mapping from this field to the AST, the AST would only screen this field against sanctioned BIC codes (i.e., sanctioned banks). | With proper mapping from this field to the AST, the AST would only screen this field against sanctioned BIC codes (i.e., sanctioned banks). |
| 39906019edda-cdcf-4b2e-8066-100f7eeef157 | Not Translated (0%) | Conversely, if a field from SWIFT were incorrectly mapped, the result could be severe under-screening of the message. | Conversely, if a field from SWIFT were incorrectly mapped, the result could be severe under-screening of the message. |
| 39916019edda-cdcf-4b2e-8066-100f7eeef157 | Not Translated (0%) | Screening the freeform text in the purpose of payment field only against sanctioned BIC codes would result in the high potential for false negatives. | Screening the freeform text in the purpose of payment field only against sanctioned BIC codes would result in the high potential for false negatives. |
| 3992e46aa480-68fe-43eb-8bf8-4ec51cfb225c | Not Translated (0%) | Organizations should review their system architecture upon its initial development and upon any additional changes to it. | Organizations should review their system architecture upon its initial development and upon any additional changes to it. |
| 3993e46aa480-68fe-43eb-8bf8-4ec51cfb225c | Not Translated (0%) | The scope and sophistication of these reviews should align with the size and complexity of the organization. | The scope and sophistication of these reviews should align with the size and complexity of the organization. |
| 3994e46aa480-68fe-43eb-8bf8-4ec51cfb225c | Not Translated (0%) | Organizations should also consider reviewing their system architecture at least annually, regardless of whether changes occur, to ensure operational effectiveness and identify areas for improvement and enhancement. | Organizations should also consider reviewing their system architecture at least annually, regardless of whether changes occur, to ensure operational effectiveness and identify areas for improvement and enhancement. |
| 3995a40eb5e6-b43d-4593-ab9e-538034876964 | Not Translated (0%) | Data, Data Flows, and Data Validation | Data, Data Flows, and Data Validation |
| 39960025af8d-d558-49b2-9f64-7f8f59d6a6c3 | Not Translated (0%) | Because IT and data are fundamental parts of ASTs, it is important for sanctions compliance teams to work with IT to properly understand how data works within the firm, where data is stored, what data is available, and the quality of the data. | Because IT and data are fundamental parts of ASTs, it is important for sanctions compliance teams to work with IT to properly understand how data works within the firm, where data is stored, what data is available, and the quality of the data. |
| 39970025af8d-d558-49b2-9f64-7f8f59d6a6c3 | Not Translated (0%) | In large firms, this can be a very difficult task, as sales data, operations data, and risk data require review and comparison to ensure important information is not being overlooked. | In large firms, this can be a very difficult task, as sales data, operations data, and risk data require review and comparison to ensure important information is not being overlooked. |
| 39980025af8d-d558-49b2-9f64-7f8f59d6a6c3 | Not Translated (0%) | It is also important to understand how data is being extracted (i.e., taken from one system, transformed or modified, and loaded or ingested between systems). | It is also important to understand how data is being extracted (i.e., taken from one system, transformed or modified, and loaded or ingested between systems). |
| 39990025af8d-d558-49b2-9f64-7f8f59d6a6c3 | Not Translated (0%) | Sometimes important data can be lost or modified through the extraction, transformation, and loading (ETL) process from one system to another in ways that can result in a compliance breach. | Sometimes important data can be lost or modified through the extraction, transformation, and loading (ETL) process from one system to another in ways that can result in a compliance breach. |
| 4000543793ef-b5f4-434a-aa72-bd63fc29f775 | Not Translated (0%) | Operational Controls | Operational Controls |
| 400135856aac-0ee4-44e7-8e75-eba4d4f1633c | Not Translated (0%) | Because ASTs can be very complex, operational controls should also be in place to limit the users’ access to only those functions that are required to perform their roles. | Because ASTs can be very complex, operational controls should also be in place to limit the users’ access to only those functions that are required to perform their roles. |
| 400235856aac-0ee4-44e7-8e75-eba4d4f1633c | Not Translated (0%) | For example, an individual who resolves alerts generated by the system generally would not have the rights to change the settings, such as the thresholds for fuzzy logic. | For example, an individual who resolves alerts generated by the system generally would not have the rights to change the settings, such as the thresholds for fuzzy logic. |
| 400335856aac-0ee4-44e7-8e75-eba4d4f1633c | Not Translated (0%) | This is known as the concept of least privilege, or only having the access necessary for the individual to perform his or her role. | This is known as the concept of least privilege, or only having the access necessary for the individual to perform his or her role. |
| 4004d9a34c70-4eb6-4982-b002-773c6e52eb73 | Not Translated (0%) | Similarly, firms must have controls in place to ensure access rights to the AST are reviewed on a periodic basis to enforce least privilege and prevent modifications, either accidental or intentional, without the requisite governance and oversight. | Similarly, firms must have controls in place to ensure access rights to the AST are reviewed on a periodic basis to enforce least privilege and prevent modifications, either accidental or intentional, without the requisite governance and oversight. |
| 400586b874b4-b9cf-4404-a0ca-6ca266f05d6c | Not Translated (0%) | Analytics and Emerging Technology | Analytics and Emerging Technology |
| 4006a2f10cc2-46d5-4772-8aab-d5d85d1de7d5 | Not Translated (0%) | Information technology is constantly advancing to meet the evolving sanctions threat and increasing demand for better solutions. | Information technology is constantly advancing to meet the evolving sanctions threat and increasing demand for better solutions. |
| 4007a2f10cc2-46d5-4772-8aab-d5d85d1de7d5 | Not Translated (0%) | With the increasing level of fines and enforcement actions, financial institutions and other firms have hired more people and invested in robotics, analytics, machine learning, and artificial intelligence. | With the increasing level of fines and enforcement actions, financial institutions and other firms have hired more people and invested in robotics, analytics, machine learning, and artificial intelligence. |
| 40086edc5845-1eff-4a05-832c-7067004b17cd | Not Translated (0%) | Data analytics combines human judgment and statistics to analyze data in various combinations in order to draw conclusions. | Data analytics combines human judgment and statistics to analyze data in various combinations in order to draw conclusions. |
| 40096edc5845-1eff-4a05-832c-7067004b17cd | Not Translated (0%) | The complexity of data analytics can range from very simple (e.g., the number of payments interdicted by geography) to very complex (e.g., the number of payments interdicted by geography, the industry code, the sanctions regime, the reviewing analysts, and the scenarios or attributes). | The complexity of data analytics can range from very simple (e.g., the number of payments interdicted by geography) to very complex (e.g., the number of payments interdicted by geography, the industry code, the sanctions regime, the reviewing analysts, and the scenarios or attributes). |
| 40106edc5845-1eff-4a05-832c-7067004b17cd | Not Translated (0%) | Data analytics requires good data quality and categorization. | Data analytics requires good data quality and categorization. |
| 4011afa15a77-36e6-4936-9f7a-039b808abc9d | Not Translated (0%) | Data visualization often accompanies good analytics and provides a visual representation of the underlying data analytics or statistics in an accessible and easily understood manner. | Data visualization often accompanies good analytics and provides a visual representation of the underlying data analytics or statistics in an accessible and easily understood manner. |
| 4012afa15a77-36e6-4936-9f7a-039b808abc9d | Not Translated (0%) | ASTs frequently include data visualization tools to produce graphs, charts, and other graphic designs. | ASTs frequently include data visualization tools to produce graphs, charts, and other graphic designs. |
| 4013afa15a77-36e6-4936-9f7a-039b808abc9d | Not Translated (0%) | Data visualization may accompany and supplement management information systems and reports. | Data visualization may accompany and supplement management information systems and reports. |
| 4014afa15a77-36e6-4936-9f7a-039b808abc9d | Not Translated (0%) | Additionally, strong analytics and visualization can be key components to strong governance and oversight, keeping board members and senior officers informed of the status and trends within the sanctions compliance program. | Additionally, strong analytics and visualization can be key components to strong governance and oversight, keeping board members and senior officers informed of the status and trends within the sanctions compliance program. |
| 4015475b1ca4-d6af-46ff-b7fa-6c11e9474f70 | Not Translated (0%) | Within a sanctions compliance program, data analytics are also effective at creating networks of related parties based on common data elements and linkage. | Within a sanctions compliance program, data analytics are also effective at creating networks of related parties based on common data elements and linkage. |
| 4016475b1ca4-d6af-46ff-b7fa-6c11e9474f70 | Not Translated (0%) | As the quantity and quality of data increase, data analytics and its usefulness generally improves, particularly when comparing trends over time. | As the quantity and quality of data increase, data analytics and its usefulness generally improves, particularly when comparing trends over time. |
| 4017475b1ca4-d6af-46ff-b7fa-6c11e9474f70 | Not Translated (0%) | However, if the data population is too small or has systemic issues, such as poor country categorization, drawing conclusions from data analytics can be dangerous. | However, if the data population is too small or has systemic issues, such as poor country categorization, drawing conclusions from data analytics can be dangerous. |
| 40182c847c97-76d1-438f-bd1c-c12609353788 | Not Translated (0%) | Robotics Process Automation (RPA) is the use of software that is designed to mimic actions that were predetermined by a human user. | Robotics Process Automation (RPA) is the use of software that is designed to mimic actions that were predetermined by a human user. |
| 40192c847c97-76d1-438f-bd1c-c12609353788 | Not Translated (0%) | When applied to sanctions compliance, RPA is straightforward and typically applied when conducting due diligence, whether at onboarding or during an investigation. | When applied to sanctions compliance, RPA is straightforward and typically applied when conducting due diligence, whether at onboarding or during an investigation. |
| 40202c847c97-76d1-438f-bd1c-c12609353788 | Not Translated (0%) | For example, if research is required on “John Smith,” and the firm requires that analysts (1) search four online search engines (e.g., Google, Bing, Baidu, and Yahoo); (2) use a set word string of “Terrorist OR Sanction OR Crime”; and (3) review the first two pages from each search, RPA can automate and collate these search requirements into a single record that an analyst can quickly access and review. | For example, if research is required on “John Smith,” and the firm requires that analysts (1) search four online search engines (e.g., Google, Bing, Baidu, and Yahoo); (2) use a set word string of “Terrorist OR Sanction OR Crime”; and (3) review the first two pages from each search, RPA can automate and collate these search requirements into a single record that an analyst can quickly access and review. |
| 40212c847c97-76d1-438f-bd1c-c12609353788 | Not Translated (0%) | Although RPA may not be able to determine whether the returned results are relevant, it can allow a human to begin reviewing the results much faster. | Although RPA may not be able to determine whether the returned results are relevant, it can allow a human to begin reviewing the results much faster. |
| 40222c847c97-76d1-438f-bd1c-c12609353788 | Not Translated (0%) | RPA is best used to replace repetitive, defined tasks that do not rely on human judgment. | RPA is best used to replace repetitive, defined tasks that do not rely on human judgment. |
| 40236ba4451e-1e07-429b-96f7-a8e04031ad6b | Not Translated (0%) | Machine learning and artificial intelligence also have been applied to sanctions compliance, although their use is currently very limited. | Machine learning and artificial intelligence also have been applied to sanctions compliance, although their use is currently very limited. |
| 40246ba4451e-1e07-429b-96f7-a8e04031ad6b | Not Translated (0%) | Machine learning is a subset of artificial intelligence. | Machine learning is a subset of artificial intelligence. |
| 40256ba4451e-1e07-429b-96f7-a8e04031ad6b | Not Translated (0%) | It builds on the necessary data quality of data analytics and begins taking into account human feedback and advanced statistical modeling techniques to make decisions with minimal human intervention. | It builds on the necessary data quality of data analytics and begins taking into account human feedback and advanced statistical modeling techniques to make decisions with minimal human intervention. |
| 40266ba4451e-1e07-429b-96f7-a8e04031ad6b | Not Translated (0%) | Machine learning concepts are being introduced in resolving sanctions screening alerts. | Machine learning concepts are being introduced in resolving sanctions screening alerts. |
| 40272be077c0-5140-4dc3-a565-20715376edbc | Not Translated (0%) | Artificial intelligence (AI), and similarly predictive analytics, is the end goal of IT development. | Artificial intelligence (AI), and similarly predictive analytics, is the end goal of IT development. |
| 40282be077c0-5140-4dc3-a565-20715376edbc | Not Translated (0%) | Full AI within a sanctions compliance program would, at the very least, involve the end-to-end resolution of potential matches, and possibly the necessary reporting. | Full AI within a sanctions compliance program would, at the very least, involve the end-to-end resolution of potential matches, and possibly the necessary reporting. |
| 40292be077c0-5140-4dc3-a565-20715376edbc | Not Translated (0%) | The industry is still a long way away from full AI, and most technology providers promise significant reductions in false positives rather than the elimination of false positives. | The industry is still a long way away from full AI, and most technology providers promise significant reductions in false positives rather than the elimination of false positives. |
| 40302be077c0-5140-4dc3-a565-20715376edbc | Not Translated (0%) | AI also includes the ability to read through optical character recognition (OCR) and analyze free-text fields for possible sanctions violations, which is especially useful for trade finance transactions involving free-text documents such as invoices, bills of lading, and letters of credit. | AI also includes the ability to read through optical character recognition (OCR) and analyze free-text fields for possible sanctions violations, which is especially useful for trade finance transactions involving free-text documents such as invoices, bills of lading, and letters of credit. |
| 4031a83e99c4-b452-41f2-8fdb-81461b46b08d | Not Translated (0%) | Although full AI is not currently feasible for sanctions compliance, a reasonable next step is partial AI—that is, what small tasks can be replaced by AI? | Although full AI is not currently feasible for sanctions compliance, a reasonable next step is partial AI—that is, what small tasks can be replaced by AI? |
| 4032a83e99c4-b452-41f2-8fdb-81461b46b08d | Not Translated (0%) | AI has made natural inroads into sanctions screening software by enhancing country information, which is often incomplete, inaccurate, or otherwise in need of enhancement. | AI has made natural inroads into sanctions screening software by enhancing country information, which is often incomplete, inaccurate, or otherwise in need of enhancement. |
| 4033a83e99c4-b452-41f2-8fdb-81461b46b08d | Not Translated (0%) | AI has also assisted in analyzing unformatted text and screening it for red flags, identifying entity names, and returning screening results on them. | AI has also assisted in analyzing unformatted text and screening it for red flags, identifying entity names, and returning screening results on them. |
| 40343d54c635-e7d2-4af5-a4dc-b1ed0687955e | Not Translated (0%) | Predictive analytics moves from the reactionary (e.g., identifying preexisting networks of sanctioned individuals) to the proactive (e.g., identifying emerging threats and risks, such as customers with sanctions exposure in their beneficial ownership that are connected to additional high-risk entities that can increase that exposure). | Predictive analytics moves from the reactionary (e.g., identifying preexisting networks of sanctioned individuals) to the proactive (e.g., identifying emerging threats and risks, such as customers with sanctions exposure in their beneficial ownership that are connected to additional high-risk entities that can increase that exposure). |
| 40353d54c635-e7d2-4af5-a4dc-b1ed0687955e | Not Translated (0%) | By analyzing large quantities of data, firms seek to identify and manage threats before they can cause sanctions breaches. | By analyzing large quantities of data, firms seek to identify and manage threats before they can cause sanctions breaches. |
| 40361a037881-cc5f-4bdd-811a-c79bed0ca245 | Not Translated (0%) | All of these emerging technologies, especially the most sophisticated ones, depend on human feedback to assist them in learning “right from wrong.” | All of these emerging technologies, especially the most sophisticated ones, depend on human feedback to assist them in learning “right from wrong.” |
| 40371a037881-cc5f-4bdd-811a-c79bed0ca245 | Not Translated (0%) | As such, they may incidentally encode human fallacies, prejudices, and biases. | As such, they may incidentally encode human fallacies, prejudices, and biases. |
| 40381a037881-cc5f-4bdd-811a-c79bed0ca245 | Not Translated (0%) | Although regulators are generally receptive to the exploration of these new technologies, practitioners must devote time and effort to clearly explaining their design, use, implementation, limitations, and weaknesses. | Although regulators are generally receptive to the exploration of these new technologies, practitioners must devote time and effort to clearly explaining their design, use, implementation, limitations, and weaknesses. |
| 4039f71368de-95a8-42a0-a7d3-a845dccd21eb | Not Translated (0%) | TECHNOLOGY VENDORS | TECHNOLOGY VENDORS |
| 404084a8e076-db2a-4487-b4cb-eb9a1133e4b0 | Not Translated (0%) | Within a sanctions compliance program, the third-party role of technology and technology vendors has significantly increased in importance. | Within a sanctions compliance program, the third-party role of technology and technology vendors has significantly increased in importance. |
| 404184a8e076-db2a-4487-b4cb-eb9a1133e4b0 | Not Translated (0%) | The NYDFS Part 504 on Filtering Programs (sanctions) highlighted their importance when it included, “The vendor selection process if a third-party vendor is used to acquire, install, implement, or test…the Filtering Program or any aspect of it.” | The NYDFS Part 504 on Filtering Programs (sanctions) highlighted their importance when it included, “The vendor selection process if a third-party vendor is used to acquire, install, implement, or test…the Filtering Program or any aspect of it.” |
| 404284a8e076-db2a-4487-b4cb-eb9a1133e4b0 | Not Translated (0%) | The reliance on technology solutions and the use of vendors should be based on the firm’s risk assessment and understanding of its risk. | The reliance on technology solutions and the use of vendors should be based on the firm’s risk assessment and understanding of its risk. |
| 404384a8e076-db2a-4487-b4cb-eb9a1133e4b0 | Not Translated (0%) | For example, firms engaged in international correspondent banking across the world must invest in more sophisticated ASTs than firms with no nominal international exposure. | For example, firms engaged in international correspondent banking across the world must invest in more sophisticated ASTs than firms with no nominal international exposure. |
| 404438cfd16c-36b3-4f07-b96e-13b16dc0dd3d | Not Translated (0%) | It is also important to assess the overall quality of the vendor support. | It is also important to assess the overall quality of the vendor support. |
| 404538cfd16c-36b3-4f07-b96e-13b16dc0dd3d | Not Translated (0%) | ASTs are far from perfect, and sanctions evaders are constantly adapting. | ASTs are far from perfect, and sanctions evaders are constantly adapting. |
| 404638cfd16c-36b3-4f07-b96e-13b16dc0dd3d | Not Translated (0%) | Compliance professionals should evaluate a vendor’s industry reputation for updating its software and meeting evolving client needs. | Compliance professionals should evaluate a vendor’s industry reputation for updating its software and meeting evolving client needs. |
| 404738cfd16c-36b3-4f07-b96e-13b16dc0dd3d | Not Translated (0%) | If a sanctions breach occurs because of an AST limitation in the software, the vendor should be expected to evaluate the root cause and provide fixes to the software that will prevent the same limitation from being exploited. | If a sanctions breach occurs because of an AST limitation in the software, the vendor should be expected to evaluate the root cause and provide fixes to the software that will prevent the same limitation from being exploited. |
| 404838cfd16c-36b3-4f07-b96e-13b16dc0dd3d | Not Translated (0%) | Even if a compliance breach occurs (e.g., processing a sanctioned transaction) because of an inherent system limitation in a vendor-provided system (e.g., an algorithm that does not parse concatenated, or joined, words) the liability remains with the firm. | Even if a compliance breach occurs (e.g., processing a sanctioned transaction) because of an inherent system limitation in a vendor-provided system (e.g., an algorithm that does not parse concatenated, or joined, words) the liability remains with the firm. |
| 404938cfd16c-36b3-4f07-b96e-13b16dc0dd3d | Not Translated (0%) | Risk ownership cannot be outsourced. | Risk ownership cannot be outsourced. |
| 405052d716d7-7fa6-49c9-addb-db400d33511f | Not Translated (0%) | Regulatory Matters | Regulatory Matters |
| 4051a0294f18-095e-4222-aaef-ca64acb463d6 | Not Translated (0%) | Since its publication of the Economic Sanctions Enforcement Guidelines, OFAC has identified deficiencies in the designing, updating, and amending of screening systems as one of the 10 main root causes of apparent regulation violations. | Since its publication of the Economic Sanctions Enforcement Guidelines, OFAC has identified deficiencies in the designing, updating, and amending of screening systems as one of the 10 main root causes of apparent regulation violations. |
| 4052e7bea331-360a-4802-bdc7-6951fc85850d | Not Translated (0%) | This section on regulatory matters addresses these issues and describes the selection of sanctions lists and the screening process, procedures, important controls, and tools. | This section on regulatory matters addresses these issues and describes the selection of sanctions lists and the screening process, procedures, important controls, and tools. |
| 40531fb1f3e4-acd8-43fb-bab3-f4d9195da4e7 | Not Translated (0%) | Sanctions Lists | Sanctions Lists |
| 4054e7fdcebc-e14c-4d9e-9841-f3b5e0fc22e0 | Not Translated (0%) | Sanctions lists are one of the tools financial institutions use as part of their sanctions due diligence process to ensure sanctions compliance. | Sanctions lists are one of the tools financial institutions use as part of their sanctions due diligence process to ensure sanctions compliance. |
| 4055e7fdcebc-e14c-4d9e-9841-f3b5e0fc22e0 | Not Translated (0%) | There are many different sanctions lists, so it is important for organizations to know what information they contain and how it relates to their customers, including the customers’ owners, controllers, and counterparties, as well as how the lists relate to the jurisdiction/geography of the institution’s business. | There are many different sanctions lists, so it is important for organizations to know what information they contain and how it relates to their customers, including the customers’ owners, controllers, and counterparties, as well as how the lists relate to the jurisdiction/geography of the institution’s business. |
| 4056a7ef75ae-9af9-472b-a575-790c6d85ebd2 | Not Translated (0%) | An institution should always use a combination of a prescriptive and a risk-based approach when selecting relevant sanctions lists. | An institution should always use a combination of a prescriptive and a risk-based approach when selecting relevant sanctions lists. |
| 4057a7ef75ae-9af9-472b-a575-790c6d85ebd2 | Not Translated (0%) | It should determine which lists are (1) mandatory (i.e., prescribed by law); (2) good to have; and (3) not relevant to its organization (i.e, risk-based). | It should determine which lists are (1) mandatory (i.e., prescribed by law); (2) good to have; and (3) not relevant to its organization (i.e, risk-based). |
| 4058a7ef75ae-9af9-472b-a575-790c6d85ebd2 | Not Translated (0%) | It is important for an organization to review the lists it is checking on an ongoing basis, as its needs can change over time as its business engages with new customers, develops new products, enters new markets, or exits existing markets. | It is important for an organization to review the lists it is checking on an ongoing basis, as its needs can change over time as its business engages with new customers, develops new products, enters new markets, or exits existing markets. |
| 40595a563c1a-0d2b-40a3-8d64-515a9d7e794a | Not Translated (0%) | Screening is not simply a matter of verifying whether a customer is identified on a list. | Screening is not simply a matter of verifying whether a customer is identified on a list. |
| 40605a563c1a-0d2b-40a3-8d64-515a9d7e794a | Not Translated (0%) | There is more detail to examine. | There is more detail to examine. |
| 40615a563c1a-0d2b-40a3-8d64-515a9d7e794a | Not Translated (0%) | Sanctions lists and supplementary information can help an institution determine whether its customer is linked to a sanctioned target as well. | Sanctions lists and supplementary information can help an institution determine whether its customer is linked to a sanctioned target as well. |
| 40625a563c1a-0d2b-40a3-8d64-515a9d7e794a | Not Translated (0%) | This allows an institution to more fully understand and monitor its sanctions risk. | This allows an institution to more fully understand and monitor its sanctions risk. |
| 4063b4b6cd7f-bf2e-4e11-9084-13b0aad9d0c6 | Not Translated (0%) | MANDATORY LISTS | MANDATORY LISTS |
| 40643037f67e-24f4-450a-8b47-42790e4f5f67 | Not Translated (0%) | Mandatory sanctions lists generally are supranational lists—such as those including targets designated by the United Nations Security Council Resolutions (UNSCR)—which an organization must screen its customers against. | Mandatory sanctions lists generally are supranational lists—such as those including targets designated by the United Nations Security Council Resolutions (UNSCR)—which an organization must screen its customers against. |
| 40653037f67e-24f4-450a-8b47-42790e4f5f67 | Not Translated (0%) | Depending on the country in which a business is located and operates, local sanctions regimes may be required and would need to be included within a firm’s sanctions compliance program. | Depending on the country in which a business is located and operates, local sanctions regimes may be required and would need to be included within a firm’s sanctions compliance program. |
| 4066989c3a46-d629-4ddc-946c-88e211ba5e90 | Not Translated (0%) | Other mandatory lists include: | Other mandatory lists include: |
| 4067ad95ca31-0503-4df6-82cd-217201f216a0 | Not Translated (0%) | EU lists, if the firm is in Europe | EU lists, if the firm is in Europe |
| 4068c3ce20c9-fe2b-4001-81c8-18e71c894092 | Not Translated (0%) | US lists, due to the breadth and scope of the US sanctions jurisdiction | US lists, due to the breadth and scope of the US sanctions jurisdiction |
| 406918bd9537-dc37-46ba-8aae-07861bcde752 | Not Translated (0%) | Host country’s list | Host country’s list |
| 4070f655ec80-27e7-4dfb-8625-8ac99dc48d36 | Not Translated (0%) | Lists of the financial institution’s parent company’s country, if the firm is a branch or subsidiary of an organization outside of the host country | Lists of the financial institution’s parent company’s country, if the firm is a branch or subsidiary of an organization outside of the host country |
| 4071166c4b28-7c64-40e8-b23a-7c8ae0ccd8e9 | Not Translated (0%) | Lists of major jurisdictions with which the organization trades | Lists of major jurisdictions with which the organization trades |
| 4072795209d6-ad38-402f-a35a-abd29322db19 | Not Translated (0%) | Lists of other neighboring countries, especially if the financial institution uses their currency | Lists of other neighboring countries, especially if the financial institution uses their currency |
| 4073e44547f9-5b48-401d-b35a-090b981a8bbc | Not Translated (0%) | Exceptions exist. | Exceptions exist. |
| 4074e44547f9-5b48-401d-b35a-090b981a8bbc | Not Translated (0%) | For example, if a bank is located in South Korea and never engages in trade with South America, considering South American countries’ lists for inclusion may be overly burdensome. | For example, if a bank is located in South Korea and never engages in trade with South America, considering South American countries’ lists for inclusion may be overly burdensome. |
| 4075e44547f9-5b48-401d-b35a-090b981a8bbc | Not Translated (0%) | Often sanctions authorities will provide a mailing list to which a firm may subscribe. | Often sanctions authorities will provide a mailing list to which a firm may subscribe. |
| 4076c48fcab6-7b65-4a34-bdda-0d3f230d1c50 | Not Translated (0%) | SUPPLEMENTARY LISTS | SUPPLEMENTARY LISTS |
| 40774774283e-c576-4ae0-89fa-866275b9e14d | Not Translated (0%) | Some countries maintain supplementary lists of people known to have evaded or attempted to evade sanctions restrictions. | Some countries maintain supplementary lists of people known to have evaded or attempted to evade sanctions restrictions. |
| 40784774283e-c576-4ae0-89fa-866275b9e14d | Not Translated (0%) | Additionally, although not as transparent, OFAC has an internal process for determining whether a person or entity should be added to the SDN list. | Additionally, although not as transparent, OFAC has an internal process for determining whether a person or entity should be added to the SDN list. |
| 40794774283e-c576-4ae0-89fa-866275b9e14d | Not Translated (0%) | Sometimes this process is lengthy. | Sometimes this process is lengthy. |
| 40804774283e-c576-4ae0-89fa-866275b9e14d | Not Translated (0%) | In order to minimize sanctions risk exposure, organizations should consider screening against names found in advisories and other reliable sources, such as negative news, in an effort to get ahead of potential sanctions risk. | In order to minimize sanctions risk exposure, organizations should consider screening against names found in advisories and other reliable sources, such as negative news, in an effort to get ahead of potential sanctions risk. |
| 40814774283e-c576-4ae0-89fa-866275b9e14d | Not Translated (0%) | For example, the OFAC Advisory to the Maritime Petroleum Shipping Community is a list of vessels and joint ventures that may merit screening against. | For example, the OFAC Advisory to the Maritime Petroleum Shipping Community is a list of vessels and joint ventures that may merit screening against. |
| 4082ad547b81-243c-4645-be83-97b6ed7e09d2 | Not Translated (0%) | A subscription to a private database can be a very efficient way to screen customers against all the major sanctions lists from countries around the world. | A subscription to a private database can be a very efficient way to screen customers against all the major sanctions lists from countries around the world. |
| 4083ad547b81-243c-4645-be83-97b6ed7e09d2 | Not Translated (0%) | These databases include information related to politically exposed persons (PEPs) in case that status was not clear prior to searching. | These databases include information related to politically exposed persons (PEPs) in case that status was not clear prior to searching. |
| 4084ad547b81-243c-4645-be83-97b6ed7e09d2 | Not Translated (0%) | If a firm does not purchase a subscription of this type, at a minimum, it should make a list of the various country sanctions authorities and blacklist websites for manual searching. | If a firm does not purchase a subscription of this type, at a minimum, it should make a list of the various country sanctions authorities and blacklist websites for manual searching. |
| 40851f9a87a5-0bb6-4795-90f3-05b71cc47959 | Not Translated (0%) | Blacklists, including EU autonomous sanctions and EU additions to UN sanctions, should be reviewed at regular intervals to ensure ongoing monitoring. | Blacklists, including EU autonomous sanctions and EU additions to UN sanctions, should be reviewed at regular intervals to ensure ongoing monitoring. |
| 40861f9a87a5-0bb6-4795-90f3-05b71cc47959 | Not Translated (0%) | This process can be automated via a subscription service or performed manually by regularly checking any updates. | This process can be automated via a subscription service or performed manually by regularly checking any updates. |
| 408701338eae-a2b6-4eee-9ce1-520ff9d8272b | Not Translated (0%) | The amount of additional research undertaken should be a risk-based decision. | The amount of additional research undertaken should be a risk-based decision. |
| 408801338eae-a2b6-4eee-9ce1-520ff9d8272b | Not Translated (0%) | The financial institution needs to ensure that it has taken sufficient measures to assess the risk. | The financial institution needs to ensure that it has taken sufficient measures to assess the risk. |
| 408901338eae-a2b6-4eee-9ce1-520ff9d8272b | Not Translated (0%) | Employees should follow their firm’s policy and use sound judgment. | Employees should follow their firm’s policy and use sound judgment. |
| 4090abe44309-8524-4d7d-a4b6-5f766a92c7f9 | Not Translated (0%) | IDENTIFIERS – INDIVIDUALS | IDENTIFIERS – INDIVIDUALS |
| 4091f2ba4028-d333-4a02-8b05-316eca7e67df | Not Translated (0%) | Sanctions lists record different types of identifiers, or types of information about a sanctions target, such as name, date of birth, jurisdiction, national identification number, entities with which a target is linked, information about penalties imposed against a target, registered legal address, and website URL. | Sanctions lists record different types of identifiers, or types of information about a sanctions target, such as name, date of birth, jurisdiction, national identification number, entities with which a target is linked, information about penalties imposed against a target, registered legal address, and website URL. |
| 4092f2ba4028-d333-4a02-8b05-316eca7e67df | Not Translated (0%) | Identifiers apply to both individuals and legal entities. | Identifiers apply to both individuals and legal entities. |
| 409358dcc7d5-d021-437a-b6c2-ec9ae24a0f96 | Not Translated (0%) | The most common identifier is the name or names of a sanctions target. | The most common identifier is the name or names of a sanctions target. |
| 409458dcc7d5-d021-437a-b6c2-ec9ae24a0f96 | Not Translated (0%) | Yet sanctions targets are known to use false personal information in order to evade detection. | Yet sanctions targets are known to use false personal information in order to evade detection. |
| 409558dcc7d5-d021-437a-b6c2-ec9ae24a0f96 | Not Translated (0%) | They use name variations, such as reversing the order of their first name and surname (e.g., John Smith becomes Smith John), or removing letters so that they are spelled differently (e.g., Jon Smith). | They use name variations, such as reversing the order of their first name and surname (e.g., John Smith becomes Smith John), or removing letters so that they are spelled differently (e.g., Jon Smith). |
| 409658dcc7d5-d021-437a-b6c2-ec9ae24a0f96 | Not Translated (0%) | Names written in another script, such as Cyrillic or Arabic, may use different spelling variations adopted over time, or their translation into English could result in spelling variations. | Names written in another script, such as Cyrillic or Arabic, may use different spelling variations adopted over time, or their translation into English could result in spelling variations. |
| 409758dcc7d5-d021-437a-b6c2-ec9ae24a0f96 | Not Translated (0%) | It is important to recognize that just because there is a target match from a list outside of the host country’s list, the activity should be evaluated but not necessarily be blocked. | It is important to recognize that just because there is a target match from a list outside of the host country’s list, the activity should be evaluated but not necessarily be blocked. |
| 40986ad379e8-e3bf-4ebd-814c-c2691e1f3d84 | Not Translated (0%) | When a target is known to have used a different name or variations in its spelling, most listings will identify all of these by using the letters AKA, or “also known as.” | When a target is known to have used a different name or variations in its spelling, most listings will identify all of these by using the letters AKA, or “also known as.” |
| 40996ad379e8-e3bf-4ebd-814c-c2691e1f3d84 | Not Translated (0%) | Some lists will use the term “alias” instead of AKA. | Some lists will use the term “alias” instead of AKA. |
| 41006ad379e8-e3bf-4ebd-814c-c2691e1f3d84 | Not Translated (0%) | The names listed as AKAs can also include nicknames, “noms-de-guerre,” stage names, and acronyms such as ISIS/ISIL. | The names listed as AKAs can also include nicknames, “noms-de-guerre,” stage names, and acronyms such as ISIS/ISIL. |
| 41016ad379e8-e3bf-4ebd-814c-c2691e1f3d84 | Not Translated (0%) | OFAC defines a weak alias, or “weak AKA,” as a broad alias that could generate a number of false hits. | OFAC defines a weak alias, or “weak AKA,” as a broad alias that could generate a number of false hits. |
| 41026ad379e8-e3bf-4ebd-814c-c2691e1f3d84 | Not Translated (0%) | These “weak AKAs” might be useful in identifying SDN’s, particularly when a possible “hit” is accompanied by other identifiers such as date of birth. | These “weak AKAs” might be useful in identifying SDN’s, particularly when a possible “hit” is accompanied by other identifiers such as date of birth. |
| 41034ba6d95d-fe0a-49c2-a50d-908e58d416da | Not Translated (0%) | OFAC has identified deficiencies in sanctions screening software and filtering faults as one of the 10 root causes of the failure of sanctions compliance programs to meet regulatory requirements. | OFAC has identified deficiencies in sanctions screening software and filtering faults as one of the 10 root causes of the failure of sanctions compliance programs to meet regulatory requirements. |
| 41044ba6d95d-fe0a-49c2-a50d-908e58d416da | Not Translated (0%) | Specifically, OFAC noted the following failures: | Specifically, OFAC noted the following failures: |
| 4105f417bc70-2458-467a-9858-565d5f3f30cd | Not Translated (0%) | Organizations did not update their sanctions screening software to incorporate updates to the SDN list. | Organizations did not update their sanctions screening software to incorporate updates to the SDN list. |
| 4106bfd62696-35e3-48fa-9baa-a9ae015e2f6a | Not Translated (0%) | The sectoral sanctions identifications (SSI) list did not include pertinent identifiers, such as SWIFT Business Identifier Codes for designated, blocked, or sanctioned financial institutions. | The sectoral sanctions identifications (SSI) list did not include pertinent identifiers, such as SWIFT Business Identifier Codes for designated, blocked, or sanctioned financial institutions. |
| 4107aefbaf72-98d8-4164-9a25-792670937ada | Not Translated (0%) | Software did not account for alternative spellings of prohibited countries or parties, particularly in instances in which the organization was domiciled or conducted business in geographies that frequently utilized such alternative spellings (e.g., “Habana” instead of “Havana,” “Kuba” instead of “Cuba,” and “Soudan” instead of “Sudan”). | Software did not account for alternative spellings of prohibited countries or parties, particularly in instances in which the organization was domiciled or conducted business in geographies that frequently utilized such alternative spellings (e.g., “Habana” instead of “Havana,” “Kuba” instead of “Cuba,” and “Soudan” instead of “Sudan”). |
| 410809eb0a65-5b32-4572-b235-f81bda2ecb12 | Not Translated (0%) | shows two extracts of listings from the OFAC SDN list and the EU consolidated list. | shows two extracts of listings from the OFAC SDN list and the EU consolidated list. |
| 410909eb0a65-5b32-4572-b235-f81bda2ecb12 | Not Translated (0%) | In the first listing, Mr. Al-Adnani is known by, or has used, 13 different names. | In the first listing, Mr. Al-Adnani is known by, or has used, 13 different names. |
| 411009eb0a65-5b32-4572-b235-f81bda2ecb12 | Not Translated (0%) | The listing for Mr. Allane also shows that he is known by different names. | The listing for Mr. Allane also shows that he is known by different names. |
| 4111aefff0e2-405a-490c-a251-5d426866b4aa | Not Translated (0%) | Lists–Target Parties–Individuals–Names | Lists–Target Parties–Individuals–Names |
| 41128590802d-2571-4fdd-b418-d5f61486b0c6 | Not Translated (0%) | AL-ADNANI, Abu Mohamed AL ADNANI 1: | AL-ADNANI, Abu Mohamed AL ADNANI 1: |
| 41138590802d-2571-4fdd-b418-d5f61486b0c6 | Not Translated (0%) | ABOU 2: | ABOU 2: |
| 41148590802d-2571-4fdd-b418-d5f61486b0c6 | Not Translated (0%) | MOHAMED 3: n/a 4: n/a 5: n/a. | MOHAMED 3: n/a 4: n/a 5: n/a. |
| 41159f8f800f-9217-49e6-a3da-8b9ed0cab1e0 | Not Translated (0%) | DOB: | DOB: |
| 4116341c4f2e-513d-4542-9f57-988472a73de7 | Not Translated (0%) | --/--/1977. | --/--/1977. |
| 411721856794-85d9-4503-9cc6-2c106662bf03 | Not Translated (0%) | POB: | POB: |
| 41189fce93db-f125-497c-aa1a-3d848125205b | Not Translated (0%) | Binnish, Syrian Arab Republic | Binnish, Syrian Arab Republic |
| 41191e974443-7109-4927-95eb-ba55adbf1616 | Not Translated (0%) | a.k.a: | a.k.a: |
| 41203536ee4d-a4ac-474a-a657-fdc605d15477 | Not Translated (0%) | (1) AL BINCHI, Tah (2) AL-ADNANI, Abu, Mohamed (3) AL-ADNANI, Abu, Mohammed (4) AL-BANSHI, Taha (5) AL-KHATAB, Abu, Baker (6) ALRAWI, Abou, Sadeq (7) ALRAWI, Yaser, Khalaf, Nazzal (8) AL-RAWI, Abu, Sadek (9) AL-RAWI, Yasser, Khalaf, Hussein, Nazal (10) AL-SHAMI, Abu-Mohammad, al-Adnani (11) FALAH, Jaber, Taha (12) FALAHA, Taha, Sobhi (13) IBRAHIM,Hajj (14) KHATTAB, Abou | (1) AL BINCHI, Tah (2) AL-ADNANI, Abu, Mohamed (3) AL-ADNANI, Abu, Mohammed (4) AL-BANSHI, Taha (5) AL-KHATAB, Abu, Baker (6) ALRAWI, Abou, Sadeq (7) ALRAWI, Yaser, Khalaf, Nazzal (8) AL-RAWI, Abu, Sadek (9) AL-RAWI, Yasser, Khalaf, Hussein, Nazal (10) AL-SHAMI, Abu-Mohammad, al-Adnani (11) FALAH, Jaber, Taha (12) FALAHA, Taha, Sobhi (13) IBRAHIM,Hajj (14) KHATTAB, Abou |
| 4121b143552c-92f3-472b-a008-cf9d50881e85 | Not Translated (0%) | Nationality: | Nationality: |
| 4122d51a5267-898f-4878-9a5f-9900c6203501 | Not Translated (0%) | Iraqi. | Iraqi. |
| 41233cc088b3-6237-4376-ade6-b6ce22f5d989 | Not Translated (0%) | ALLANE, Hacene (alias (a) Hassan the Old, (b) Al Sheikh Abdelhay, (c) Boulahia, (d) Abu al-Foutouh, (e) Cheib Ahcéne). | ALLANE, Hacene (alias (a) Hassan the Old, (b) Al Sheikh Abdelhay, (c) Boulahia, (d) Abu al-Foutouh, (e) Cheib Ahcéne). |
| 41247f97efd6-ecab-472b-95c1-afd6529c2385 | Not Translated (0%) | Date of birth: | Date of birth: |
| 4125a09ddfb3-849c-45b7-afe2-d2ee01ac4ee8 | Not Translated (0%) | 17.1.1941. | 17.1.1941. |
| 4126885c1b20-9094-40d1-8866-3f8b963cbc6b | Not Translated (0%) | Place of birth: | Place of birth: |
| 412774498929-ddc3-498d-9144-85b5e25eb7d9 | Not Translated (0%) | Médéa, Algeria. | Médéa, Algeria. |
| 4128a0337f63-1a5c-42c1-9973-88cda64a7c69 | Not Translated (0%) | Nationality: | Nationality: |
| 41297cac3381-a4e8-4914-827d-7a2dd8f0e9a3 | Not Translated (0%) | Algerian. | Algerian. |
| 413036801856-0c88-4e00-8847-d358282c0733 | Not Translated (0%) | Other information: | Other information: |
| 41312bb6dc4d-8554-418d-ba3e-215e5f35d6bd | Not Translated (0%) | Reportedly killed on 16.4.2004 in northern Niger. | Reportedly killed on 16.4.2004 in northern Niger. |
| 413252eaee32-a075-474a-9061-d4628f8af55c | Not Translated (0%) | Another important identifier is jurisdiction—information concerning a target’s nationality, place of birth, country of residence, and other jurisdiction connections. | Another important identifier is jurisdiction—information concerning a target’s nationality, place of birth, country of residence, and other jurisdiction connections. |
| 413352eaee32-a075-474a-9061-d4628f8af55c | Not Translated (0%) | Targets can have connections to more than one jurisdiction. | Targets can have connections to more than one jurisdiction. |
| 413452eaee32-a075-474a-9061-d4628f8af55c | Not Translated (0%) | For example, <9303/> is a further extract from the listing for Mr. Al-Adnani. | For example, <9303/> is a further extract from the listing for Mr. Al-Adnani. |
| 413552eaee32-a075-474a-9061-d4628f8af55c | Not Translated (0%) | The jurisdiction identifiers show that he was born in Syria, but he also identified himself as an Iraqi national. | The jurisdiction identifiers show that he was born in Syria, but he also identified himself as an Iraqi national. |
| 413652eaee32-a075-474a-9061-d4628f8af55c | Not Translated (0%) | Mr. Al-Adnani is also known to have been in Iraq as part of his role as the spokesperson for ISIS. | Mr. Al-Adnani is also known to have been in Iraq as part of his role as the spokesperson for ISIS. |
| 4137aff8c115-25c5-47b4-b441-730115ef48d3 | Not Translated (0%) | A target’s date of birth is also an identifier, although it is not considered to be a reliable source of information for a number of reasons: | A target’s date of birth is also an identifier, although it is not considered to be a reliable source of information for a number of reasons: |
| 41388994ada2-692a-4939-9726-f1ebe667343a | Not Translated (0%) | Lists–Target Parties–Individuals–Jurisdiction | Lists–Target Parties–Individuals–Jurisdiction |
| 41395980de52-10df-40b3-8b49-45daa1941010 | Not Translated (0%) | AL ADNANI 1: | AL ADNANI 1: |
| 41405980de52-10df-40b3-8b49-45daa1941010 | Not Translated (0%) | ABOU 2: | ABOU 2: |
| 41415980de52-10df-40b3-8b49-45daa1941010 | Not Translated (0%) | MOHAMED 3: n/a 4: n/a 5: n/a. | MOHAMED 3: n/a 4: n/a 5: n/a. |
| 4142b5cb928b-08ba-4dde-8305-d144abe18107 | Not Translated (0%) | DOB: | DOB: |
| 4143f6407c1b-cdcb-4a5f-afc3-2ca63beb2e57 | Not Translated (0%) | --/--/1977 | --/--/1977 |
| 41444b792dd6-7f3e-46ae-9757-49ae13a0cdde | Not Translated (0%) | POB: | POB: |
| 41456110ccc1-0285-4e8c-9bb3-726c9d496766 | Not Translated (0%) | Binnish, Syrian Arab Republic | Binnish, Syrian Arab Republic |
| 4146358d1557-f8d9-427a-8239-25ab0a00f503 | Not Translated (0%) | a.k.a: | a.k.a: |
| 4147c22e8a96-7af7-4b85-a06e-f14973e54691 | Not Translated (0%) | (1) AL BINCHI, … | (1) AL BINCHI, … |
| 414863ec90c6-5bd5-4189-bb1f-7b0bba00f7a2 | Not Translated (0%) | Nationality: | Nationality: |
| 41490f70433b-86c9-400b-b9cb-dfd56b50b012 | Not Translated (0%) | Iraqi | Iraqi |
| 415087a7c012-6ad9-4752-80e0-40f3a275a084 | Not Translated (0%) | Other Information: | Other Information: |
| 41511d32a4b3-1f7a-417a-87d7-b75ea2639ad6 | Not Translated (0%) | Official spokesman of Islamic State in Iraq and the Levant (ISIL), listed as Al-Qaida in Iraq (QE.J.115.04), and emir of ISIL in Syria,closely associated with Abu Mohammed al-Jawlani (QI.317.13) and Abu Bakr al-Baghdadi, listed as Ibrahim Awwad Ibrahim Ali al-Badri al-Samarrai(QI.A.299.11). | Official spokesman of Islamic State in Iraq and the Levant (ISIL), listed as Al-Qaida in Iraq (QE.J.115.04), and emir of ISIL in Syria,closely associated with Abu Mohammed al-Jawlani (QI.317.13) and Abu Bakr al-Baghdadi, listed as Ibrahim Awwad Ibrahim Ali al-Badri al-Samarrai(QI.A.299.11). |
| 41521d32a4b3-1f7a-417a-87d7-b75ea2639ad6 | Not Translated (0%) | Date of birth is approximate. | Date of birth is approximate. |
| 415363a333c7-9258-41f9-b769-e431fea37a5b | Not Translated (0%) | Listed on: | Listed on: |
| 4154bed8bcae-bb51-4c0a-9695-4f1cd1f2392a | Not Translated (0%) | 15/08/2014 | 15/08/2014 |
| 4155d6bc06d9-f2cd-4801-96dc-4bb435b1183a | Not Translated (0%) | Last Updated: | Last Updated: |
| 41568d195494-7de9-429f-8513-6d81c8798e5d | Not Translated (0%) | 22/08/2014 | 22/08/2014 |
| 4157d3b7d8ad-b2d5-42d6-977e-86b187c35c04 | Not Translated (0%) | Group ID: | Group ID: |
| 415899794ebd-bb82-492f-929e-ab8cd827072c | Not Translated (0%) | 13086 | 13086 |
| 41592d2310ad-baab-4f9a-b8e6-b6a2152c7428 | Not Translated (0%) | Dates of birth are recorded in different formats. | Dates of birth are recorded in different formats. |
| 41602d2310ad-baab-4f9a-b8e6-b6a2152c7428 | Not Translated (0%) | For example, 3/8/2010 in the United States equates to March 8, but in the United Kingdom it equates to August 3. | For example, 3/8/2010 in the United States equates to March 8, but in the United Kingdom it equates to August 3. |
| 4161fc0d5b35-1cca-44fc-96a3-97a004231a8e | Not Translated (0%) | Some countries did not maintain official birth records in the past, so dates of birth can be guesses or estimates. | Some countries did not maintain official birth records in the past, so dates of birth can be guesses or estimates. |
| 4162f6f52fff-6be1-4187-b123-4bae2da7ee3e | Not Translated (0%) | Some countries did not include birth information on identification cards, which are a commonly relied upon source of government-verified information. | Some countries did not include birth information on identification cards, which are a commonly relied upon source of government-verified information. |
| 41639e6d8dcc-ad97-4891-8236-3c73c4cd017f | Not Translated (0%) | Targets have been known to use fictitious birth date information. | Targets have been known to use fictitious birth date information. |
| 4164b468ee53-94ea-4633-a72f-02b7297d9729 | Not Translated (0%) | Additional identifiers include passports and national identification numbers, which are typically issued as part of a national identification card. | Additional identifiers include passports and national identification numbers, which are typically issued as part of a national identification card. |
| 4165f6d0b34b-189a-4d90-88a5-f39a0cec4bab | Not Translated (0%) | In the example shown in <9429/>, the individual holds a Yemeni passport and was issued a national identification number by the authorities in Saudi Arabia. | In the example shown in <9429/>, the individual holds a Yemeni passport and was issued a national identification number by the authorities in Saudi Arabia. |
| 4166f6d0b34b-189a-4d90-88a5-f39a0cec4bab | Not Translated (0%) | This information is considered to be reliable because it typically originates from government authorities who have verified an individual’s identity before issuing the passport. | This information is considered to be reliable because it typically originates from government authorities who have verified an individual’s identity before issuing the passport. |
| 4167f6d0b34b-189a-4d90-88a5-f39a0cec4bab | Not Translated (0%) | This information can prove very useful, especially when collected as part of customer due diligence. | This information can prove very useful, especially when collected as part of customer due diligence. |
| 4168f6d0b34b-189a-4d90-88a5-f39a0cec4bab | Not Translated (0%) | The identification number issued by some countries also indicates the region from which the individual came, along with their date of birth. | The identification number issued by some countries also indicates the region from which the individual came, along with their date of birth. |
| 4169c272f180-a8f0-4b63-b524-ceb37014e8a1 | Not Translated (0%) | Lists–Target Parties–Individuals–Passport/National Identification Number | Lists–Target Parties–Individuals–Passport/National Identification Number |
| 4170e28af3bf-dc29-4fd0-9fb2-5b918133c5d4 | Not Translated (0%) | Name: | Name: |
| 41718f359b69-b7c3-4007-9378-9793aac59933 | Not Translated (0%) | AL-RUMAYSH: | AL-RUMAYSH: |
| 41728f359b69-b7c3-4007-9378-9793aac59933 | Not Translated (0%) | MU’TASSIM: | MU’TASSIM: |
| 41738f359b69-b7c3-4007-9378-9793aac59933 | Not Translated (0%) | YAHYA: | YAHYA: |
| 41748f359b69-b7c3-4007-9378-9793aac59933 | Not Translated (0%) | ‘ALI | ‘ALI |
| 4175b9479240-a5ce-437e-8e7f-5aa5734d27cc | Not Translated (0%) | DOB: | DOB: |
| 41768965021f-4ff7-429d-b873-6c531c7a380a | Not Translated (0%) | 04/01/1973. | 04/01/1973. |
| 41778140c033-5e46-4b33-9c25-443c6cc22611 | Not Translated (0%) | POB: | POB: |
| 417831715680-4758-423b-9e38-9aa7fdbb6578 | Not Translated (0%) | Jedah, Saudi Arabia | Jedah, Saudi Arabia |
| 417988931284-ced6-4da7-9d3e-9c65dbce8ff4 | Not Translated (0%) | a.k.a: | a.k.a: |
| 4180e9a50511-ee3f-45fb-8235-144e5ff7842d | Not Translated (0%) | AL-JEDDAWI, Abu-Rayhanah, al-Ansari | AL-JEDDAWI, Abu-Rayhanah, al-Ansari |
| 4181c4c9161e-667b-4ef4-9d22-72e2b73e6014 | Not Translated (0%) | Nationality: | Nationality: |
| 4182e8560ca1-8be9-40e8-b70d-0b7104f2e649 | Not Translated (0%) | Yemeni | Yemeni |
| 4183595da337-6a7a-4327-9390-6d13b2bfa802 | Not Translated (0%) | Passport Details: | Passport Details: |
| 4184af44887f-f02a-447d-a0a6-3f8cb59fc105 | Not Translated (0%) | Passport No: | Passport No: |
| 4185af44887f-f02a-447d-a0a6-3f8cb59fc105 | Not Translated (0%) | 01055336 (Yemeni passport) National Identification no: | 01055336 (Yemeni passport) National Identification no: |
| 4186af44887f-f02a-447d-a0a6-3f8cb59fc105 | Not Translated (0%) | Saudi Arabian alien registration no.2054275397, issued on 22.07.1998 | Saudi Arabian alien registration no.2054275397, issued on 22.07.1998 |
| 41878b45720c-46dc-4ad0-83e5-904654a5cbbd | Not Translated (0%) | Other Information: | Other Information: |
| 4188581a8317-681f-4064-801d-6a433b1b1cd8 | Not Translated (0%) | Also referred to as: | Also referred to as: |
| 4189581a8317-681f-4064-801d-6a433b1b1cd8 | Not Translated (0%) | Rayhanah, Abu-Rayhanah and Handalah. | Rayhanah, Abu-Rayhanah and Handalah. |
| 4190e2b95d58-8ec9-42da-99f6-2cb198e85dc3 | Not Translated (0%) | Yet another identifier includes the names of any entities or individuals with whom a target has been associated or linked. | Yet another identifier includes the names of any entities or individuals with whom a target has been associated or linked. |
| 4191e2b95d58-8ec9-42da-99f6-2cb198e85dc3 | Not Translated (0%) | Examples of this type of identifier include: | Examples of this type of identifier include: |
| 4192f36f9bed-19d4-4e37-be6e-84939e192f03 | Not Translated (0%) | Political parties | Political parties |
| 4193b336975e-e819-44d8-83cd-a0ff8a55aa99 | Not Translated (0%) | Position held within militia or insurgent group | Position held within militia or insurgent group |
| 41946ccf2828-81d4-4496-b392-ebdd120a20d7 | Not Translated (0%) | Executive position or directorship | Executive position or directorship |
| 41953ed3ddd8-a583-4860-9405-ae2ddbd9343c | Not Translated (0%) | Commercial activities | Commercial activities |
| 41964767c3af-7ea8-4e7a-9d11-77b1ee859297 | Not Translated (0%) | Associations or activities with SDNs | Associations or activities with SDNs |
| 4197e54f6b15-c6b2-4a44-beaa-5758cd53202b | Not Translated (0%) | For example, in <9541/>, the list shows that Mr. Al-Adnani is known to be involved with ISIS in Iraq as its official spokesperson. | For example, in <9541/>, the list shows that Mr. Al-Adnani is known to be involved with ISIS in Iraq as its official spokesperson. |
| 4198e54f6b15-c6b2-4a44-beaa-5758cd53202b | Not Translated (0%) | The listing also identifies a number of individuals with whom he is known to be associated. | The listing also identifies a number of individuals with whom he is known to be associated. |
| 41995e41531a-22c4-4383-ba32-e83e17b16b12 | Not Translated (0%) | Lists–Target Parties–Individuals–Associations and Linkages | Lists–Target Parties–Individuals–Associations and Linkages |
| 42000704f7d6-ee6a-4416-9cc5-7e56a33a6614 | Not Translated (0%) | Name: | Name: |
| 42019212304c-1419-4248-a880-76063457bbc9 | Not Translated (0%) | AL ADNANI 1: | AL ADNANI 1: |
| 42029212304c-1419-4248-a880-76063457bbc9 | Not Translated (0%) | … | … |
| 42030fff26e5-c2e2-4a08-bfe3-e0f52adaf112 | Not Translated (0%) | Nationality: | Nationality: |
| 42049d53f30b-dfb9-4f28-a7d6-c2f2d51bea18 | Not Translated (0%) | Iraqi | Iraqi |
| 4205b429895f-9e0e-4d45-83b1-8af5b476d553 | Not Translated (0%) | Other Information: | Other Information: |
| 42067ce3c06f-2e3b-4fc8-956f-1f74d86eac26 | Not Translated (0%) | Official spokesman of Islamic State in Iraq and the Levant (ISIL), listed as Al-Qaida in Iraq (QE.J.115.04), and emir of ISIL in Syria, closely associated with Abu Mohammed al-Jawlani (QI.317.13) and Abu Bakr al-Baghdadi, listed as Ibrahim Awwad Ibrahim Ali al-Badri al-Samarrai (QI.A.299.11). | Official spokesman of Islamic State in Iraq and the Levant (ISIL), listed as Al-Qaida in Iraq (QE.J.115.04), and emir of ISIL in Syria, closely associated with Abu Mohammed al-Jawlani (QI.317.13) and Abu Bakr al-Baghdadi, listed as Ibrahim Awwad Ibrahim Ali al-Badri al-Samarrai (QI.A.299.11). |
| 42073bcddfa2-fabf-4b66-ade6-fefaf943ba2c | Not Translated (0%) | Listed on: | Listed on: |
| 4208bbf94976-3e9f-415a-92d4-3e415a051fa2 | Not Translated (0%) | 15/08/2014 | 15/08/2014 |
| 420901464d45-e6e6-4a7f-b12d-4e2e988d16e8 | Not Translated (0%) | Last Updated: | Last Updated: |
| 421023ac199f-4b6f-4160-946b-565176108545 | Not Translated (0%) | 22/08/2014 | 22/08/2014 |
| 42115ed136b6-f48c-4471-89ab-fdc41c4220ff | Not Translated (0%) | Group ID: | Group ID: |
| 4212a74e7947-0723-488d-9488-f175e1693fdc | Not Translated (0%) | 13086 | 13086 |
| 42130edd2918-53ec-493d-96a8-8d75aa67abab | Not Translated (0%) | One additional identifier is information about other sanctions or penalties imposed against a target. | One additional identifier is information about other sanctions or penalties imposed against a target. |
| 42140edd2918-53ec-493d-96a8-8d75aa67abab | Not Translated (0%) | As shown in the listing extract in <9617/>, Mr. Alouche was deported by the German authorities. | As shown in the listing extract in <9617/>, Mr. Alouche was deported by the German authorities. |
| 42150edd2918-53ec-493d-96a8-8d75aa67abab | Not Translated (0%) | Under “other information,” there is a reference to the fact that Mr. Alouche was first placed on a sanctions list by the United Nations. | Under “other information,” there is a reference to the fact that Mr. Alouche was first placed on a sanctions list by the United Nations. |
| 42160edd2918-53ec-493d-96a8-8d75aa67abab | Not Translated (0%) | Information about Mr. Alouche on the UN website reveals more about what happened in Germany: | Information about Mr. Alouche on the UN website reveals more about what happened in Germany: |
| 42170edd2918-53ec-493d-96a8-8d75aa67abab | Not Translated (0%) | Mr. Alouche was deported because he was known to have links to Al-Qaeda cells in Germany operated by Abu Musab al-Zarqawi, the Jordanian-born militant who operated a paramilitary training camp in Afghanistan and who was thought to have been behind numerous terrorist attacks. | Mr. Alouche was deported because he was known to have links to Al-Qaeda cells in Germany operated by Abu Musab al-Zarqawi, the Jordanian-born militant who operated a paramilitary training camp in Afghanistan and who was thought to have been behind numerous terrorist attacks. |
| 42183ae0d99b-ed2d-44ad-842c-4ef6088d581e | Not Translated (0%) | Lists–Target Parties–Individuals–Other Government “Sanctions” | Lists–Target Parties–Individuals–Other Government “Sanctions” |
| 4219352810b3-788e-4736-a547-3b45918cd95e | Not Translated (0%) | Name: | Name: |
| 422074f9860b-08bd-4f8a-8faf-57780bf97d56 | Not Translated (0%) | ALOUCHE: | ALOUCHE: |
| 422174f9860b-08bd-4f8a-8faf-57780bf97d56 | Not Translated (0%) | ISAM: | ISAM: |
| 422274f9860b-08bd-4f8a-8faf-57780bf97d56 | Not Translated (0%) | ALI: | ALI: |
| 422374f9860b-08bd-4f8a-8faf-57780bf97d56 | Not Translated (0%) | MOHAMED | MOHAMED |
| 4224584f6925-96cf-4050-96fe-6516e30f5955 | Not Translated (0%) | DOB: | DOB: |
| 42253c6fb8f3-a7e8-49c4-a4f6-4fe4de260d3f | Not Translated (0%) | (1) 21/03/1974. | (1) 21/03/1974. |
| 42263c6fb8f3-a7e8-49c4-a4f6-4fe4de260d3f | Not Translated (0%) | (2) --/--/1972. | (2) --/--/1972. |
| 42270df75b1d-de6f-467e-85ed-7687255a8ad2 | Not Translated (0%) | POB: | POB: |
| 4228ed9820d7-afb3-4d38-8c4a-5ce21f1a6b63 | Not Translated (0%) | Baghdad, Iraq | Baghdad, Iraq |
| 4229af808741-c072-40bb-93a3-b40562d03878 | Not Translated (0%) | a.k.a: | a.k.a: |
| 4230d161f6b4-5e3d-4dc8-a207-d0f9f352c8d8 | Not Translated (0%) | THAER, Mansour | THAER, Mansour |
| 423103e4e870-7c86-43dc-abdb-4f54f9e0f9ff | Not Translated (0%) | Nationality: | Nationality: |
| 423238671bb0-6b87-4190-a329-a31658d917c7 | Not Translated (0%) | Jordanian | Jordanian |
| 423305d6ff5b-d63f-4e0c-a6d0-37cc0ad56fb6 | Not Translated (0%) | Other Information: | Other Information: |
| 4234c05ca5d7-f37e-4550-b842-34119c0e5dee | Not Translated (0%) | UN Ref QI.T.76.02. | UN Ref QI.T.76.02. |
| 4235c05ca5d7-f37e-4550-b842-34119c0e5dee | Not Translated (0%) | Was deported from Germany to Jordan in Feb 2005. | Was deported from Germany to Jordan in Feb 2005. |
| 42362c557028-df0d-43b3-af3b-a8f146f0b095 | Not Translated (0%) | Name: | Name: |
| 42374a5c28c0-29cc-48ff-9964-9552a6868738 | Not Translated (0%) | KAKWAVU BUKANDE 1: | KAKWAVU BUKANDE 1: |
| 42384a5c28c0-29cc-48ff-9964-9552a6868738 | Not Translated (0%) | JEROME 2: n/a 3: n/a 4: n/a 5: n/a. | JEROME 2: n/a 3: n/a 4: n/a 5: n/a. |
| 4239a7dc250b-a806-49ab-9001-76dbc202baa1 | Not Translated (0%) | Title: | Title: |
| 42406d29a629-4161-4de5-851c-8874a5193b2d | Not Translated (0%) | General POB: | General POB: |
| 42416d29a629-4161-4de5-851c-8874a5193b2d | Not Translated (0%) | Goma | Goma |
| 4242e271f49b-3820-461c-9bef-d3d36943c81e | Not Translated (0%) | a.k.a: | a.k.a: |
| 424380a8f136-3c82-4780-a06c-e3b292dbc52b | Not Translated (0%) | (1) COMMANDANT JEROME (2) AKWAVU, Jerome | (1) COMMANDANT JEROME (2) AKWAVU, Jerome |
| 4244ac930a8e-e770-4504-ab75-1a04b297dd01 | Not Translated (0%) | Nationality: | Nationality: |
| 42455be1a34f-b2e1-4db7-91b2-1db0e67515d3 | Not Translated (0%) | Congolese | Congolese |
| 4246fa4b86a4-9cf2-44fe-ba57-e4f416795a85 | Not Translated (0%) | Other Information: | Other Information: |
| 4247019b4700-0dec-41b2-8d18-53e8ae3de31f | Not Translated (0%) | Former General in FARDC, Given the rank in December 2014. | Former General in FARDC, Given the rank in December 2014. |
| 4248019b4700-0dec-41b2-8d18-53e8ae3de31f | Not Translated (0%) | Former President of UCD/FAPC. | Former President of UCD/FAPC. |
| 4249019b4700-0dec-41b2-8d18-53e8ae3de31f | Not Translated (0%) | Detained in Makala Prison in Kinshasa (as at June 2011). | Detained in Makala Prison in Kinshasa (as at June 2011). |
| 4250019b4700-0dec-41b2-8d18-53e8ae3de31f | Not Translated (0%) | Convicted in November 2014 by the DRC military to 10 years in prison. | Convicted in November 2014 by the DRC military to 10 years in prison. |
| 42513bab071e-ad5d-403c-8e32-0689494f08df | Not Translated (0%) | Listed on: | Listed on: |
| 42529120016d-4b60-4ee8-81fd-ff613b540943 | Not Translated (0%) | 02/11/2005 | 02/11/2005 |
| 42539f229a21-fe06-4bd9-a538-d19addbc9af8 | Not Translated (0%) | Last Updated: | Last Updated: |
| 425481fde259-991e-4353-a98c-c35897ce9459 | Not Translated (0%) | 09/03/2017 | 09/03/2017 |
| 4255cd68b7d0-6b98-43b4-a0ca-b0c822c52dd6 | Not Translated (0%) | Group ID: | Group ID: |
| 4256034c5731-73c6-4962-9fa2-097f6e2ef0d0 | Not Translated (0%) | 8707 | 8707 |
| 42576905231b-3a49-4fd1-9516-07f0f61f7f70 | Not Translated (0%) | IDENTIFIERS – LEGAL ENTITIES | IDENTIFIERS – LEGAL ENTITIES |
| 4258800125f0-00bd-4a0d-aeee-3f86ffb09635 | Not Translated (0%) | Legal entities—that is, legal persons and legal arrangements, such as corporations, partnerships, trusts, foundations, and similar types of structures—can also be listed as targets. | Legal entities—that is, legal persons and legal arrangements, such as corporations, partnerships, trusts, foundations, and similar types of structures—can also be listed as targets. |
| 4259800125f0-00bd-4a0d-aeee-3f86ffb09635 | Not Translated (0%) | One example is parties who are suspected of posing a high risk of breaching trade restrictions because they have been previously denied exporting privileges. | One example is parties who are suspected of posing a high risk of breaching trade restrictions because they have been previously denied exporting privileges. |
| 42607204053b-d786-4113-b48d-d63db469b971 | Not Translated (0%) | OFAC publishes a list of foreign individuals and entities determined to have violated, attempted to violate, conspired to violate, or caused a violation of US sanctions on Syria or Iran, pursuant to Executive Order 13608. | OFAC publishes a list of foreign individuals and entities determined to have violated, attempted to violate, conspired to violate, or caused a violation of US sanctions on Syria or Iran, pursuant to Executive Order 13608. |
| 42617204053b-d786-4113-b48d-d63db469b971 | Not Translated (0%) | It also lists foreign persons who have facilitated deceptive transactions for or on behalf of persons subject to US sanctions. | It also lists foreign persons who have facilitated deceptive transactions for or on behalf of persons subject to US sanctions. |
| 42627204053b-d786-4113-b48d-d63db469b971 | Not Translated (0%) | Collectively, such individuals and companies are called foreign sanctions evaders (FSEs), and transactions by US persons or within the United States involving FSEs are prohibited. | Collectively, such individuals and companies are called foreign sanctions evaders (FSEs), and transactions by US persons or within the United States involving FSEs are prohibited. |
| 42637204053b-d786-4113-b48d-d63db469b971 | Not Translated (0%) | The FSE list is not part of the SDN list; however, individuals and companies on the FSE list may also appear on the SDN list. | The FSE list is not part of the SDN list; however, individuals and companies on the FSE list may also appear on the SDN list. |
| 4264beeab601-70a9-4c77-8501-e9194c52d03b | Not Translated (0%) | Other lists identify parties in whom businesses cannot invest. | Other lists identify parties in whom businesses cannot invest. |
| 426577cbdcd7-2b8a-4847-b099-805d1cf0b80e | Not Translated (0%) | The listing of legal entities can include common identifiers such as: | The listing of legal entities can include common identifiers such as: |
| 426663f4a05f-0da4-49f1-8149-0f4ba6a40e80 | Not Translated (0%) | Registered or corporation name and registration number | Registered or corporation name and registration number |
| 4267a383dacb-76ea-4b46-bd82-818af46491eb | Not Translated (0%) | Registered or legal address or any known operating address | Registered or legal address or any known operating address |
| 42685e05cbf8-30c5-4ad6-b30b-ead4ede74d00 | Not Translated (0%) | Jurisdiction associated with the entity and/or its activities | Jurisdiction associated with the entity and/or its activities |
| 4269958bd99b-c630-4e8a-bf4f-d614efc22cd9 | Not Translated (0%) | Names of associated entities or individuals | Names of associated entities or individuals |
| 427061b2e588-fdda-4a17-95ba-aa139db9059c | Not Translated (0%) | Website, email, telephone, and fax details | Website, email, telephone, and fax details |
| 4271178f5a5c-9b68-4116-806b-2dba6089291f | Not Translated (0%) | Other details | Other details |
| 427247bec90b-924a-41c0-902c-f82655508a89 | Not Translated (0%) | The listing example shown in <9823/> comes from the OFAC list of SDNs. | The listing example shown in <9823/> comes from the OFAC list of SDNs. |
| 427347bec90b-924a-41c0-902c-f82655508a89 | Not Translated (0%) | Here, the jurisdiction identifier shows that the legal entity is connected to Vancouver, Canada, and the United Kingdom. | Here, the jurisdiction identifier shows that the legal entity is connected to Vancouver, Canada, and the United Kingdom. |
| 427447bec90b-924a-41c0-902c-f82655508a89 | Not Translated (0%) | (Remember, some targets are not situated in sanctioned countries.) | (Remember, some targets are not situated in sanctioned countries.) |
| 427547bec90b-924a-41c0-902c-f82655508a89 | Not Translated (0%) | The list includes other identifiers as well, such as the names the company is known by, its addresses, and registration and license numbers. | The list includes other identifiers as well, such as the names the company is known by, its addresses, and registration and license numbers. |
| 427647bec90b-924a-41c0-902c-f82655508a89 | Not Translated (0%) | In terms of associated entities, the listing identifies that this company is linked to the PACNET Group. | In terms of associated entities, the listing identifies that this company is linked to the PACNET Group. |
| 4277a0378cd1-3720-443d-bf08-889242e34311 | Not Translated (0%) | Lists–Target Parties–Legal Entities–Identifiers | Lists–Target Parties–Legal Entities–Identifiers |
| 427829add11b-2793-4edf-a28a-7f72cafed791 | Not Translated (0%) | Name: | Name: |
| 4279b105f9db-374f-47e1-af74-7e705e03d00d | Not Translated (0%) | PACIFIC NETWORK SERVICES LTD. | PACIFIC NETWORK SERVICES LTD. |
| 4280b105f9db-374f-47e1-af74-7e705e03d00d | Not Translated (0%) | (a.k.a. PACNET AMERICAS; a.k.a. PACNET CANADA; a.k.a. PACNET SERVICES AMERICAS LTD.; a.k.a. PACNET SERVICES LTD.) | (a.k.a. PACNET AMERICAS; a.k.a. PACNET CANADA; a.k.a. PACNET SERVICES AMERICAS LTD.; a.k.a. PACNET SERVICES LTD.) |
| 4281f3a1c140-137d-4896-9152-8bc1f66080d1 | Not Translated (0%) | Address: | Address: |
| 42821c6a4c26-ee5c-4644-92f6-08f3ae79fac7 | Not Translated (0%) | Fourth Floor, 595 Howe St, Vancouver, BC V6C 2T5, Canada; Parkshot House, 5 Kew Road, Richmond, Surrey, England TW9 2PR, United Kingdom; | Fourth Floor, 595 Howe St, Vancouver, BC V6C 2T5, Canada; Parkshot House, 5 Kew Road, Richmond, Surrey, England TW9 2PR, United Kingdom; |
| 428313c09ec7-311f-499f-9f6c-5f82660b0b12 | Not Translated (0%) | Registration ID | Registration ID |
| 428424091dd2-38d3-4cea-975e-a08edac58ed6 | Not Translated (0%) | M08842780 (Canada) | M08842780 (Canada) |
| 42859b6f74e6-edf2-4f59-acb7-55f90fe20d92 | Not Translated (0%) | Company Number | Company Number |
| 4286511b610f-bfa3-47cb-93fb-7652b5ae71cd | Not Translated (0%) | BC0469083 (Canada) | BC0469083 (Canada) |
| 4287f607b519-4713-4e1e-b4bc-e5b32fa34125 | Not Translated (0%) | License | License |
| 4288c2115e17-4ca3-40ba-8cb4-63bfe46aa15d | Not Translated (0%) | 15128950 (Canada) [TCO] | 15128950 (Canada) [TCO] |
| 4289838e91a4-c1a3-403f-8a0e-d335cbd9dea6 | Not Translated (0%) | Linked To: | Linked To: |
| 429099403090-1e47-4217-b405-9280a2745fe5 | Not Translated (0%) | PACNET GROUP | PACNET GROUP |
| 4291ae6ff507-348d-46ce-b04c-0f795769c1c6 | Not Translated (0%) | By searching the OFAC SDN list, it can be determined that this group is an international payments processor and money services business, with a history of money laundering, including mail fraud schemes that targeted victims in the United States and throughout the world. | By searching the OFAC SDN list, it can be determined that this group is an international payments processor and money services business, with a history of money laundering, including mail fraud schemes that targeted victims in the United States and throughout the world. |
| 4292d265a835-1f7c-41aa-bf68-326ecd4ef44b | Not Translated (0%) | Sometimes a listing will include information about the activities undertaken by a legal entity, as shown in <9901/>. | Sometimes a listing will include information about the activities undertaken by a legal entity, as shown in <9901/>. |
| 4293d265a835-1f7c-41aa-bf68-326ecd4ef44b | Not Translated (0%) | The extract from this listing shows that Ocean Maritime Management Company Limited operated a vessel called the Chong Chon Gang. | The extract from this listing shows that Ocean Maritime Management Company Limited operated a vessel called the Chong Chon Gang. |
| 4294d265a835-1f7c-41aa-bf68-326ecd4ef44b | Not Translated (0%) | The company used the vessel to ship weapons to North Korea. | The company used the vessel to ship weapons to North Korea. |
| 4295dd61e458-b9dc-4163-b408-850c103acfda | Not Translated (0%) | Lists–Target Parties–Legal Entities–Other Details | Lists–Target Parties–Legal Entities–Other Details |
| 4296c6ca10b3-10cd-44be-8c3e-321f77956498 | Not Translated (0%) | Name: | Name: |
| 4297d9e44a2c-0624-430e-8c75-fe7293321689 | Not Translated (0%) | OCEAN MARITIME MANAGEMENT COMPANY, LIMITED (OMM) | OCEAN MARITIME MANAGEMENT COMPANY, LIMITED (OMM) |
| 42982f422dac-87e2-41f6-9ddf-7f6b061f65d2 | Not Translated (0%) | a.k.a.: | a.k.a.: |
| 4299ddb5ac66-90a8-4708-a41a-9410e216e517 | Not Translated (0%) | na | na |
| 4300a171f06c-962c-43e6-ba52-3169604d1198 | Not Translated (0%) | F.k.a.: | F.k.a.: |
| 4301b6950d1d-3612-4dc8-88cc-b4a804a71362 | Not Translated (0%) | na | na |
| 43026d05ea7c-38e6-4913-a110-7654eda0c25e | Not Translated (0%) | Listed on: | Listed on: |
| 4303b8c974e2-9c09-4bd9-8d37-c4eacfe54631 | Not Translated (0%) | 28 Jul. 2014 | 28 Jul. 2014 |
| 430450e8da2d-e053-4962-be35-516c9858c4c1 | Not Translated (0%) | Other information: | Other information: |
| 4305d507676d-176c-4072-80d9-b0f0c6a0265d | Not Translated (0%) | Ocean Maritime Management Company, Limited is the operator/manager of the vessel Chong Chon Gang. | Ocean Maritime Management Company, Limited is the operator/manager of the vessel Chong Chon Gang. |
| 4306d507676d-176c-4072-80d9-b0f0c6a0265d | Not Translated (0%) | It played a key role in arranging the shipment of concealed cargo of arms and related materiel from Cuba to the DPRK in July 2013. | It played a key role in arranging the shipment of concealed cargo of arms and related materiel from Cuba to the DPRK in July 2013. |
| 4307d507676d-176c-4072-80d9-b0f0c6a0265d | Not Translated (0%) | As such, Ocean Maritime Management Company, Limited contributed to activities prohibited by the resolutions, namely the arms embargo imposed by Resolution 1718 (2006), as modified by Resolution 1874 (2009), and contributed to the evasion of the measures imposed by these resolutions. | As such, Ocean Maritime Management Company, Limited contributed to activities prohibited by the resolutions, namely the arms embargo imposed by Resolution 1718 (2006), as modified by Resolution 1874 (2009), and contributed to the evasion of the measures imposed by these resolutions. |
| 43080345abb8-b262-4197-a622-2da913b970a7 | Not Translated (0%) | The key individuals involved in an entity’s ownership, control, and operation are also identifiers, although the extent to which listings for legal entities actually cross reference or identify these individuals can vary. | The key individuals involved in an entity’s ownership, control, and operation are also identifiers, although the extent to which listings for legal entities actually cross reference or identify these individuals can vary. |
| 43090345abb8-b262-4197-a622-2da913b970a7 | Not Translated (0%) | Examples include beneficial owners, controllers, executives, and directors. | Examples include beneficial owners, controllers, executives, and directors. |
| 43107ec31bd9-31a4-4345-8fff-d28b0152fd5e | Not Translated (0%) | In the extract from an OFAC list in <9969/>, the listing for Indian River (UK) Limited does not refer to the individuals who own or control the company. | In the extract from an OFAC list in <9969/>, the listing for Indian River (UK) Limited does not refer to the individuals who own or control the company. |
| 43117ec31bd9-31a4-4345-8fff-d28b0152fd5e | Not Translated (0%) | However, these individuals could be subject to sanctions restrictions. | However, these individuals could be subject to sanctions restrictions. |
| 43127ec31bd9-31a4-4345-8fff-d28b0152fd5e | Not Translated (0%) | A further search of the list reveals that an individual named Ruth Ferlow is connected to the company. | A further search of the list reveals that an individual named Ruth Ferlow is connected to the company. |
| 43137ec31bd9-31a4-4345-8fff-d28b0152fd5e | Not Translated (0%) | According to the OFAC website, Ms. Ferlow was the director, manager, and company secretary of Indian River, along with several other PACNET-linked companies. | According to the OFAC website, Ms. Ferlow was the director, manager, and company secretary of Indian River, along with several other PACNET-linked companies. |
| 43147ec31bd9-31a4-4345-8fff-d28b0152fd5e | Not Translated (0%) | This example highlights the importance of doing separate screening of both legal entities and the individuals who may own or control them. | This example highlights the importance of doing separate screening of both legal entities and the individuals who may own or control them. |
| 4315c0d54849-b64e-4048-b169-476cfeb1849f | Not Translated (0%) | Lists–Target Parties–Legal Entities | Lists–Target Parties–Legal Entities |
| 431693dd0cce-60ee-4f72-9729-9530ba9154ad | Not Translated (0%) | Name: | Name: |
| 4317fc7fb8ca-65be-4ff6-9729-cfc84865abe4 | Not Translated (0%) | INDIAN RIVER (UK) LTD., D11 Glyme Court, Oxford Office Village, Langford Lane, Kidlington, Oxon OX5 1LQ, United Kingdom; Company Number 07927999 (United Kingdom) [TCO] (Linked To: | INDIAN RIVER (UK) LTD., D11 Glyme Court, Oxford Office Village, Langford Lane, Kidlington, Oxon OX5 1LQ, United Kingdom; Company Number 07927999 (United Kingdom) [TCO] (Linked To: |
| 4318fc7fb8ca-65be-4ff6-9729-cfc84865abe4 | Not Translated (0%) | PACNET CONNECTIONS LIMITED; Linked To: | PACNET CONNECTIONS LIMITED; Linked To: |
| 4319fc7fb8ca-65be-4ff6-9729-cfc84865abe4 | Not Translated (0%) | PACNET GROUP). | PACNET GROUP). |
| 4320283fcc6e-d72c-463c-9af9-cf65f3f958b6 | Not Translated (0%) | FERLOW, Ruth (a.k.a. FERLOW, Ruth Hilda Rose), D11 Glyme Court, Oxford Office Village, Langford Lane, Kidlington, Oxon OX5 1LQ, United Kingdom; 4910 Keith Road, Vancouver, BC V7W 2NI, Canada; 4th Floor, 595 Howe Street, Vancouver, BC V6C 2TF, Canada; DOB 05 Jan 1967; nationality Canada (individual) [TCO] (Linked To: | FERLOW, Ruth (a.k.a. FERLOW, Ruth Hilda Rose), D11 Glyme Court, Oxford Office Village, Langford Lane, Kidlington, Oxon OX5 1LQ, United Kingdom; 4910 Keith Road, Vancouver, BC V7W 2NI, Canada; 4th Floor, 595 Howe Street, Vancouver, BC V6C 2TF, Canada; DOB 05 Jan 1967; nationality Canada (individual) [TCO] (Linked To: |
| 4321283fcc6e-d72c-463c-9af9-cf65f3f958b6 | Not Translated (0%) | PACNET SERVICES LTD; | PACNET SERVICES LTD; |
| 43221ccc3e67-5584-47b6-93d2-6975b9e2cd63 | Not Translated (0%) | Linked To: | Linked To: |
| 432326dcb1fa-206a-4df9-b82e-c062a1cacb40 | Not Translated (0%) | CHEXX INC.; | CHEXX INC.; |
| 43242b7fa18b-3d72-4644-86d4-801250830f0b | Not Translated (0%) | Linked To: | Linked To: |
| 4325a4ae91b3-6e8e-4eac-abad-f713c2ea68ec | Not Translated (0%) | INDIAN RIVER (UK) LTD.; | INDIAN RIVER (UK) LTD.; |
| 43264772a91c-0dbe-4a25-b63f-5d4080713bf6 | Not Translated (0%) | Linked To: | Linked To: |
| 4327298b8e71-5de6-433f-8fce-92dfb6a4520e | Not Translated (0%) | PACNET GROUP | PACNET GROUP |
| 4328f9fa617f-ba79-4d62-bc89-36ecf2d600df | Not Translated (0%) | UPDATING SANCTIONS LISTS | UPDATING SANCTIONS LISTS |
| 43293d10160f-42b3-40e4-ae0b-5697c19bb1aa | Not Translated (0%) | Lists are constantly changing, sometimes daily. | Lists are constantly changing, sometimes daily. |
| 43303d10160f-42b3-40e4-ae0b-5697c19bb1aa | Not Translated (0%) | Because restrictions must be enforced immediately upon their introduction, it is crucial for financial institutions to stay current with the political climate and monitor lists frequently to ensure that they align with the firm’s sanctions policy. | Because restrictions must be enforced immediately upon their introduction, it is crucial for financial institutions to stay current with the political climate and monitor lists frequently to ensure that they align with the firm’s sanctions policy. |
| 43313d10160f-42b3-40e4-ae0b-5697c19bb1aa | Not Translated (0%) | It is helpful to monitor government websites through subscriptions, create tailored news alerts, follow applicable periodicals, such as the ACAMS newsletter moneylaundering.com, and to require vendors to immediately provide updated lists. | It is helpful to monitor government websites through subscriptions, create tailored news alerts, follow applicable periodicals, such as the ACAMS newsletter moneylaundering.com, and to require vendors to immediately provide updated lists. |
| 4332be7ca22d-75a5-4f4c-a179-d63ae45959dc | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 4333be7ca22d-75a5-4f4c-a179-d63ae45959dc | Not Translated (0%) | OLEG DERIPASKA, 2019 | OLEG DERIPASKA, 2019 |
| 433459b617f7-f03e-4903-bbd8-f06a56a505b0 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 4335482f31b3-9e40-48d3-a2d0-76cc640da5f1 | Not Translated (0%) | The Russian billionaire Oleg Deripaska was designated under US sanctions in April 2018. | The Russian billionaire Oleg Deripaska was designated under US sanctions in April 2018. |
| 4336482f31b3-9e40-48d3-a2d0-76cc640da5f1 | Not Translated (0%) | He sued the US Department of the Treasury in March 2019 to be delisted, claiming that the basis on which he was placed on the list was a result of “filthy lies.” | He sued the US Department of the Treasury in March 2019 to be delisted, claiming that the basis on which he was placed on the list was a result of “filthy lies.” |
| 4337482f31b3-9e40-48d3-a2d0-76cc640da5f1 | Not Translated (0%) | The Treasury alleged that, in Russia, Deripaska supported Russian president Vladimir Putin and his projects in the energy sector. | The Treasury alleged that, in Russia, Deripaska supported Russian president Vladimir Putin and his projects in the energy sector. |
| 4338482f31b3-9e40-48d3-a2d0-76cc640da5f1 | Not Translated (0%) | In response, the Treasury released (with redactions) a 161-page evidentiary memorandum laying out the case as to why Deripaska merited inclusion on the sanctions list. | In response, the Treasury released (with redactions) a 161-page evidentiary memorandum laying out the case as to why Deripaska merited inclusion on the sanctions list. |
| 4339482f31b3-9e40-48d3-a2d0-76cc640da5f1 | Not Translated (0%) | The memo cites media reports, Deripaska’s website, company prospectus, and other records. | The memo cites media reports, Deripaska’s website, company prospectus, and other records. |
| 43403f3f8d13-c872-4eef-8376-b6d1c1473dfb | Not Translated (0%) | Although a sanctions actor can challenge a designation through an administrative process, to be removed from the US treasury list, the actor must submit evidence to support his or her removal. | Although a sanctions actor can challenge a designation through an administrative process, to be removed from the US treasury list, the actor must submit evidence to support his or her removal. |
| 43413f3f8d13-c872-4eef-8376-b6d1c1473dfb | Not Translated (0%) | In the past, Deripaska had been successful in getting companies that he controlled, such as En+ Group PLC, to agree to decrease his control in the company and add Americans and Europeans to the boards of directors. | In the past, Deripaska had been successful in getting companies that he controlled, such as En+ Group PLC, to agree to decrease his control in the company and add Americans and Europeans to the boards of directors. |
| 43423f3f8d13-c872-4eef-8376-b6d1c1473dfb | Not Translated (0%) | However, he has been unsuccessful in getting himself removed from the list. | However, he has been unsuccessful in getting himself removed from the list. |
| 43433f3f8d13-c872-4eef-8376-b6d1c1473dfb | Not Translated (0%) | The inability to remove a company from a sanctions list can result in the failure of the company. | The inability to remove a company from a sanctions list can result in the failure of the company. |
| 43447fc2f210-8d44-48f0-9b55-185b6f0b036a | Not Translated (0%) | “Legal Filing in Deripaska Case Provides Rare Insight Into Supporting Evidence on Designation,” Kharon Brief, June 3, 2019. | “Legal Filing in Deripaska Case Provides Rare Insight Into Supporting Evidence on Designation,” Kharon Brief, June 3, 2019. |
| 43456b87f54d-ce1f-463c-b8f4-5055df4b5038 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 4346a6cb1971-e52c-47fe-834d-7f8437cf535b | Not Translated (0%) | Being delisted from a sanctions list often requires evidence of a change in behavior, such as changes to an organization’s overall governance structure. | Being delisted from a sanctions list often requires evidence of a change in behavior, such as changes to an organization’s overall governance structure. |
| 4347f8c16c68-260e-4e83-8de6-301e88fb8ed8 | Not Translated (0%) | Sanctions can result in companies facing financial challenges due to the trade restrictions. | Sanctions can result in companies facing financial challenges due to the trade restrictions. |
| 4348c4b229c5-ffe3-4bb3-bdfa-a10877a4fb29 | Not Translated (0%) | An SDN–controlled entity that was formerly listed can be delisted. | An SDN–controlled entity that was formerly listed can be delisted. |
| 4349c4b229c5-ffe3-4bb3-bdfa-a10877a4fb29 | Not Translated (0%) | It is important to note that this does not automatically mean that the SDN himself/herself has been delisted. | It is important to note that this does not automatically mean that the SDN himself/herself has been delisted. |
| 4350a75f765d-b5e7-4d69-bdb1-517991c6df30 | Not Translated (0%) | The Screening Process, Procedures, Important Controls, and Tools | The Screening Process, Procedures, Important Controls, and Tools |
| 4351d19da3ef-b512-441d-9bf4-c5460e8f0b36 | Not Translated (0%) | As shown in <10086/>, the basic screening process flows in this way: | As shown in <10086/>, the basic screening process flows in this way: |
| 4352d19da3ef-b512-441d-9bf4-c5460e8f0b36 | Not Translated (0%) | Customer data and/or payment messages flow into the AST, where the information is screened against sanctions lists. | Customer data and/or payment messages flow into the AST, where the information is screened against sanctions lists. |
| 4353d19da3ef-b512-441d-9bf4-c5460e8f0b36 | Not Translated (0%) | Depending on how it’s configured, an AST will compare every word of a payment message against sanctions lists and check names and geographic information, such as countries under embargo, and perform string matching for BIC codes and passport numbers. | Depending on how it’s configured, an AST will compare every word of a payment message against sanctions lists and check names and geographic information, such as countries under embargo, and perform string matching for BIC codes and passport numbers. |
| 4354d19da3ef-b512-441d-9bf4-c5460e8f0b36 | Not Translated (0%) | The AST gets feedback from the sanctions lists and produces a screening result. | The AST gets feedback from the sanctions lists and produces a screening result. |
| 43557d991230-3a1c-418d-8e1e-8d53d6791255 | Not Translated (0%) | How Screening Works | How Screening Works |
| 435627876ea3-8169-4c83-9125-5e7986dc0c39 | Not Translated (0%) | String matching, also referred to as pattern matching, is one of many algorithms for efficient searching that involves finding occurrence(s) of a pattern string within another string or body of text. | String matching, also referred to as pattern matching, is one of many algorithms for efficient searching that involves finding occurrence(s) of a pattern string within another string or body of text. |
| 435727876ea3-8169-4c83-9125-5e7986dc0c39 | Not Translated (0%) | This method can be used to recognize passport numbers, national ID numbers, telephone numbers, zip codes, postal codes, and any other information that follows a specific pattern. | This method can be used to recognize passport numbers, national ID numbers, telephone numbers, zip codes, postal codes, and any other information that follows a specific pattern. |
| 435827876ea3-8169-4c83-9125-5e7986dc0c39 | Not Translated (0%) | It is also useful for looking for information that follows leading text, such as “Name:” and extracting the text that comes after it. | It is also useful for looking for information that follows leading text, such as “Name:” and extracting the text that comes after it. |
| 435927876ea3-8169-4c83-9125-5e7986dc0c39 | Not Translated (0%) | Another use is in reprocessing documents; for example, extracting a piece of information such as the date from a file name and entering it in a field. | Another use is in reprocessing documents; for example, extracting a piece of information such as the date from a file name and entering it in a field. |
| 436027876ea3-8169-4c83-9125-5e7986dc0c39 | Not Translated (0%) | Pattern matching works by “reading” through text strings to match patterns. | Pattern matching works by “reading” through text strings to match patterns. |
| 43617436a1ec-1abf-40b1-8f4f-056946ee8b66 | Not Translated (0%) | An AST’s filter engine retains potential matches between customer data and payment messages that contain enough information to match an algorithm or scenario. | An AST’s filter engine retains potential matches between customer data and payment messages that contain enough information to match an algorithm or scenario. |
| 43627436a1ec-1abf-40b1-8f4f-056946ee8b66 | Not Translated (0%) | Then it applies a weighting, threshold, or other matching criteria to show how close the potential match is to an algorithm or scenario. | Then it applies a weighting, threshold, or other matching criteria to show how close the potential match is to an algorithm or scenario. |
| 43637436a1ec-1abf-40b1-8f4f-056946ee8b66 | Not Translated (0%) | As noted previously, it is important to set thresholds correctly. | As noted previously, it is important to set thresholds correctly. |
| 436419f2b903-eea8-4a9e-ba80-7febf9fc987f | Not Translated (0%) | A hit, potential match, or name match, is when the screening process indicates a possible sanctioned person. | A hit, potential match, or name match, is when the screening process indicates a possible sanctioned person. |
| 436519f2b903-eea8-4a9e-ba80-7febf9fc987f | Not Translated (0%) | An analyst’s review (or investigation) of the underlying hits within an alert will determine the meaningfulness of the hits. | An analyst’s review (or investigation) of the underlying hits within an alert will determine the meaningfulness of the hits. |
| 436619f2b903-eea8-4a9e-ba80-7febf9fc987f | Not Translated (0%) | An individual’s review of a hit will result in one of the following outcomes: | An individual’s review of a hit will result in one of the following outcomes: |
| 43679d51082e-1f04-4cb9-b10b-6b4edb5507e2 | Not Translated (0%) | A target match—when the review concludes that the party identified is in fact the same as the one named on a sanctions list (also referred to as a true match) | A target match—when the review concludes that the party identified is in fact the same as the one named on a sanctions list (also referred to as a true match) |
| 43680b83f3c4-1ecc-4a65-8e8e-0932ec9f31fd | Not Translated (0%) | Escalate to a case investigation—generally enough information will not be present to initially determine whether a hit is a target match; therefore, escalation to a case investigation is required to conduct additional due diligence and research | Escalate to a case investigation—generally enough information will not be present to initially determine whether a hit is a target match; therefore, escalation to a case investigation is required to conduct additional due diligence and research |
| 43690a93387a-11ed-488d-aeed-aeb7875ad100 | Not Translated (0%) | A false positive—not a match to a target named on a sanctions list | A false positive—not a match to a target named on a sanctions list |
| 43706287cef2-056b-4e5e-ae9f-90a48b29b87a | Not Translated (0%) | A false negative—the hit is dismissed, but is in fact a match to a target named on a sanctions list | A false negative—the hit is dismissed, but is in fact a match to a target named on a sanctions list |
| 4371cc07748c-6893-4ad3-8a9b-596d8b571377 | Not Translated (0%) | When all of the underlying hits have been resolved, an alert can be given a final disposition of (1) target match; (2) escalate; or (3) false positive. | When all of the underlying hits have been resolved, an alert can be given a final disposition of (1) target match; (2) escalate; or (3) false positive. |
| 4372cc07748c-6893-4ad3-8a9b-596d8b571377 | Not Translated (0%) | An analyst should never intentionally make the disposition of false negative, as this term is reserved for situations in which an analyst makes an error that results in a sanctioned target not being identified. | An analyst should never intentionally make the disposition of false negative, as this term is reserved for situations in which an analyst makes an error that results in a sanctioned target not being identified. |
| 4373b4d4f0dd-f75a-4aa8-a01d-406ac23d785e | Not Translated (0%) | MANAGING ALERTS | MANAGING ALERTS |
| 4374ba29ed0c-2f0d-43bb-9377-43b6499c04b0 | Not Translated (0%) | It can be extremely challenging for a financial institution to manage the volume of hits and alerts generated by an AST. | It can be extremely challenging for a financial institution to manage the volume of hits and alerts generated by an AST. |
| 4375ba29ed0c-2f0d-43bb-9377-43b6499c04b0 | Not Translated (0%) | Each organization has its own internal processes for its AST that outline how hits should be assessed and managed, and how decisions should be made and documented. | Each organization has its own internal processes for its AST that outline how hits should be assessed and managed, and how decisions should be made and documented. |
| 4376ba29ed0c-2f0d-43bb-9377-43b6499c04b0 | Not Translated (0%) | The following is a high-level overview of the common strategies used by some organizations to manage alert volumes. | The following is a high-level overview of the common strategies used by some organizations to manage alert volumes. |
| 437791580c19-dd46-41e1-9c2f-f91903235040 | Not Translated (0%) | One strategy is to calibrate the threshold used by the AST for matches so that it only generates alerts that are very similar to the information on a sanctions list. | One strategy is to calibrate the threshold used by the AST for matches so that it only generates alerts that are very similar to the information on a sanctions list. |
| 437891580c19-dd46-41e1-9c2f-f91903235040 | Not Translated (0%) | For example, a firm could limit their reviews to when screening results show a 90% or more likely match to a sanctions target. | For example, a firm could limit their reviews to when screening results show a 90% or more likely match to a sanctions target. |
| 437991580c19-dd46-41e1-9c2f-f91903235040 | Not Translated (0%) | Although this strategy would reduce the number of hits to review, it is not acceptable. | Although this strategy would reduce the number of hits to review, it is not acceptable. |
| 438091580c19-dd46-41e1-9c2f-f91903235040 | Not Translated (0%) | Regulators object to the application of this strategy solely to reduce the number of hits without also considering the impact of effectively identifying possible sanctions risks. | Regulators object to the application of this strategy solely to reduce the number of hits without also considering the impact of effectively identifying possible sanctions risks. |
| 43812532fbe9-e2a1-473b-825a-9b3e394f6674 | Not Translated (0%) | Another strategy for handling a high volume of hits and alerts is the use of “whitelists,” also known as “good guy lists” and “false hit lists.” | Another strategy for handling a high volume of hits and alerts is the use of “whitelists,” also known as “good guy lists” and “false hit lists.” |
| 43822532fbe9-e2a1-473b-825a-9b3e394f6674 | Not Translated (0%) | Whitelists include individuals and entities whose characteristics trigger a hit or alert by the AST, but who are found not to be a match to a sanctions list. | Whitelists include individuals and entities whose characteristics trigger a hit or alert by the AST, but who are found not to be a match to a sanctions list. |
| 43832532fbe9-e2a1-473b-825a-9b3e394f6674 | Not Translated (0%) | Some ASTs allow users to attach supplementary information that supports the conclusion that this person or entity is not a sanctions target and warrants inclusion on the whitelist. | Some ASTs allow users to attach supplementary information that supports the conclusion that this person or entity is not a sanctions target and warrants inclusion on the whitelist. |
| 4384e5fae3d9-4dca-41a9-8965-881780ab0e90 | Not Translated (0%) | Many regulators seek proof that whitelists or suppression/exemptions lists are routinely subjected to screening against new names added to sanctions list and that there are procedures in place to ensure controls over whitelist entries. | Many regulators seek proof that whitelists or suppression/exemptions lists are routinely subjected to screening against new names added to sanctions list and that there are procedures in place to ensure controls over whitelist entries. |
| 4385e4defaf5-41ee-4f50-9da9-f71a355ad9be | Not Translated (0%) | Firms should also maintain internal blacklists for purposes of sanctions. | Firms should also maintain internal blacklists for purposes of sanctions. |
| 4386e4defaf5-41ee-4f50-9da9-f71a355ad9be | Not Translated (0%) | A blacklist is an internal list of names (including places, persons, entities, and individuals) that are screened to identify any sanctions exposure, in addition to government and vendor-maintained sanctions lists. | A blacklist is an internal list of names (including places, persons, entities, and individuals) that are screened to identify any sanctions exposure, in addition to government and vendor-maintained sanctions lists. |
| 4387e4defaf5-41ee-4f50-9da9-f71a355ad9be | Not Translated (0%) | Other potential additions to a firm’s internal blacklist may come from OFAC advisories and other warnings that list entities that did not merit being placed on the SDN list, but are still considered high risk. | Other potential additions to a firm’s internal blacklist may come from OFAC advisories and other warnings that list entities that did not merit being placed on the SDN list, but are still considered high risk. |
| 4388e4defaf5-41ee-4f50-9da9-f71a355ad9be | Not Translated (0%) | Internal list entries may also come from media reporting of reported sanctions evasion and reports issued by bodies such as the United Nations. | Internal list entries may also come from media reporting of reported sanctions evasion and reports issued by bodies such as the United Nations. |
| 4389188887f4-f091-42ca-b459-72173f6525fa | Not Translated (0%) | “Warning notices” are notices of entities or other known sanctioned risks that firms should take into account. | “Warning notices” are notices of entities or other known sanctioned risks that firms should take into account. |
| 4390188887f4-f091-42ca-b459-72173f6525fa | Not Translated (0%) | They are issued by financial authorities and supervisors (e.g., BaFin, Financial Conduct Authority [FCA], and the Swiss Financial Market Supervisory Authority [FINMA]) and can include: | They are issued by financial authorities and supervisors (e.g., BaFin, Financial Conduct Authority [FCA], and the Swiss Financial Market Supervisory Authority [FINMA]) and can include: |
| 4391166f455e-486c-4274-b4eb-665c6e984c60 | Not Translated (0%) | “Wanted” lists from police departments, governments, and national and international investigation authorities (e.g., Interpol, Federal Bureau of Investigation [FBI], and Drug Enforcement Administration [DEA]) | “Wanted” lists from police departments, governments, and national and international investigation authorities (e.g., Interpol, Federal Bureau of Investigation [FBI], and Drug Enforcement Administration [DEA]) |
| 4392f192d2da-ad77-4ebc-8777-677878807f94 | Not Translated (0%) | Lists from international tribunals | Lists from international tribunals |
| 4393afd85451-ae8b-4e0e-8ed6-cf2889ab3d43 | Not Translated (0%) | Enforcement actions | Enforcement actions |
| 43949dfab909-03c6-4633-bd7d-6a9bd1cbb4c2 | Not Translated (0%) | Disqualified directors and debarred companies from governmental and international agencies | Disqualified directors and debarred companies from governmental and international agencies |
| 4395daed117b-af9e-4f6b-b8d5-7da18177e963 | Not Translated (0%) | FATF’s list of high-risk and monitored jurisdictions | FATF’s list of high-risk and monitored jurisdictions |
| 439607a76261-3a67-4f3b-a397-694dde646abf | Not Translated (0%) | The EU’s list of tax havens and high-risk countries | The EU’s list of tax havens and high-risk countries |
| 43975b06e047-200e-4c3e-9832-c806eb8346fd | Not Translated (0%) | Some vendors may offer a “one-stop shop” where an organization can run searches against various lists simultaneously. | Some vendors may offer a “one-stop shop” where an organization can run searches against various lists simultaneously. |
| 4398ee6f6090-7053-41da-b1f5-84a4e1ede662 | Not Translated (0%) | Another strategy for managing the volume of hits and alerts is to create more specific scenarios and rules. | Another strategy for managing the volume of hits and alerts is to create more specific scenarios and rules. |
| 4399ee6f6090-7053-41da-b1f5-84a4e1ede662 | Not Translated (0%) | The more specific an institution is about the typologies and scenarios that need to be screened, the more efficient the AST will be in generating alerts. | The more specific an institution is about the typologies and scenarios that need to be screened, the more efficient the AST will be in generating alerts. |
| 4400f10112da-677b-464d-88ba-529874897331 | Not Translated (0%) | An organization can also be more selective about the lists screened based on the sanctions risk assessment. | An organization can also be more selective about the lists screened based on the sanctions risk assessment. |
| 4401f10112da-677b-464d-88ba-529874897331 | Not Translated (0%) | There can be a large number of potential sanctions lists to screen against; however, screening against every list available may generate an unwieldy number of false positives, especially when a target is included on more than one list. | There can be a large number of potential sanctions lists to screen against; however, screening against every list available may generate an unwieldy number of false positives, especially when a target is included on more than one list. |
| 4402f10112da-677b-464d-88ba-529874897331 | Not Translated (0%) | Therefore, institutions should ensure that the lists they screen against are based on the results of the organization’s sanctions risk assessment. | Therefore, institutions should ensure that the lists they screen against are based on the results of the organization’s sanctions risk assessment. |
| 4403c80e6d95-5dfb-43eb-8e97-d71ea0d4d1bf | Not Translated (0%) | If the AST is generating excessive duplicate alerts across different lists, it may be appropriate to examine which lists are the most relevant and complete. | If the AST is generating excessive duplicate alerts across different lists, it may be appropriate to examine which lists are the most relevant and complete. |
| 4404c80e6d95-5dfb-43eb-8e97-d71ea0d4d1bf | Not Translated (0%) | In fact, some vendors provide a consolidated list. | In fact, some vendors provide a consolidated list. |
| 4405eaaa11a4-0989-4edc-98c8-da4c4bee0134 | Not Translated (0%) | There are additional strategies to help overcome the specific challenges of payment screening, with the caveat that institutions must always follow internal procedures for clearing hits. | There are additional strategies to help overcome the specific challenges of payment screening, with the caveat that institutions must always follow internal procedures for clearing hits. |
| 4406eaaa11a4-0989-4edc-98c8-da4c4bee0134 | Not Translated (0%) | As a general practice, flagged transactions can be stopped and put into a pending queue while they are being checked and verified. | As a general practice, flagged transactions can be stopped and put into a pending queue while they are being checked and verified. |
| 4407eaaa11a4-0989-4edc-98c8-da4c4bee0134 | Not Translated (0%) | Also, decision trees can help analysts evaluate each hit. | Also, decision trees can help analysts evaluate each hit. |
| 4408eaaa11a4-0989-4edc-98c8-da4c4bee0134 | Not Translated (0%) | Some ASTs highlight the keywords in the database, payment message, or sanctions list that generated the hit. | Some ASTs highlight the keywords in the database, payment message, or sanctions list that generated the hit. |
| 4409d119d4b3-e11e-44be-ad80-d7d23e2ab308 | Not Translated (0%) | Junk data, or nonsensical data, added to a payment message could be an indication of wire stripping. | Junk data, or nonsensical data, added to a payment message could be an indication of wire stripping. |
| 4410d119d4b3-e11e-44be-ad80-d7d23e2ab308 | Not Translated (0%) | For example, if a bank blocks a payment or returns it for compliance reasons, how does the bank know that the originating bank will not alter the original payment message and re-submit it? | For example, if a bank blocks a payment or returns it for compliance reasons, how does the bank know that the originating bank will not alter the original payment message and re-submit it? |
| 4411d119d4b3-e11e-44be-ad80-d7d23e2ab308 | Not Translated (0%) | Some ASTs keep records of the data from blocked or returned payments and reference it when examining new payments messages. | Some ASTs keep records of the data from blocked or returned payments and reference it when examining new payments messages. |
| 4412d119d4b3-e11e-44be-ad80-d7d23e2ab308 | Not Translated (0%) | If a new message has a high degree of similarity to content from a previous blocked or returned one, it triggers a hit as a possible “wire stripping” attempt. | If a new message has a high degree of similarity to content from a previous blocked or returned one, it triggers a hit as a possible “wire stripping” attempt. |
| 441315c80dde-a4bc-4215-83c4-c8891e92d30d | Not Translated (0%) | Customer Screening with Higher Thresholds (Static Data) vs. Screening of Unstructured Data | Customer Screening with Higher Thresholds (Static Data) vs. Screening of Unstructured Data |
| 44141e2c388b-18eb-4673-bc30-7482934b1738 | Not Translated (0%) | Firms can use two different ASTs for their real-time payment messages and their static customer data. | Firms can use two different ASTs for their real-time payment messages and their static customer data. |
| 44151e2c388b-18eb-4673-bc30-7482934b1738 | Not Translated (0%) | Even if they do not use different base ASTs, they may use different thresholds because the screening of real-time payment messages can contain unstructured data in the form of a “purpose of payment.” | Even if they do not use different base ASTs, they may use different thresholds because the screening of real-time payment messages can contain unstructured data in the form of a “purpose of payment.” |
| 44161e2c388b-18eb-4673-bc30-7482934b1738 | Not Translated (0%) | In addition, the messages can contain names and places with typographical errors and other mistakes because they were entered and sent from an outside institution. | In addition, the messages can contain names and places with typographical errors and other mistakes because they were entered and sent from an outside institution. |
| 44172ed1695e-7f6d-4142-a1f6-cbc2c47f8edc | Not Translated (0%) | Compare this situation to static customer data in which dual controls are in place to ensure that one person enters the name correctly and the other person checks it for accuracy. | Compare this situation to static customer data in which dual controls are in place to ensure that one person enters the name correctly and the other person checks it for accuracy. |
| 44182ed1695e-7f6d-4142-a1f6-cbc2c47f8edc | Not Translated (0%) | As a general rule, firms tend to have higher data quality that is verified against legal documents for their customers than for the counterparties. | As a general rule, firms tend to have higher data quality that is verified against legal documents for their customers than for the counterparties. |
| 44192ed1695e-7f6d-4142-a1f6-cbc2c47f8edc | Not Translated (0%) | For this reason, when screening static data, the thresholds may be higher because the data quality is higher. | For this reason, when screening static data, the thresholds may be higher because the data quality is higher. |
| 44200a41aab5-572b-4dfe-ab43-bef6ba7fe2cd | Not Translated (0%) | Vendor Screening | Vendor Screening |
| 442149482b65-3522-49ed-8b9f-71b092d254c6 | Not Translated (0%) | Financial institutions and other obliged entities should also have controls in place to screen their vendors. | Financial institutions and other obliged entities should also have controls in place to screen their vendors. |
| 442249482b65-3522-49ed-8b9f-71b092d254c6 | Not Translated (0%) | For financial institutions, this may be part of their vendor risk management program. | For financial institutions, this may be part of their vendor risk management program. |
| 442349482b65-3522-49ed-8b9f-71b092d254c6 | Not Translated (0%) | The screening of vendors should involve determining the ultimate beneficial owner (UBO) and ascertaining the vendor’s ownership structure, similar to customer due diligence requirements. | The screening of vendors should involve determining the ultimate beneficial owner (UBO) and ascertaining the vendor’s ownership structure, similar to customer due diligence requirements. |
| 442449482b65-3522-49ed-8b9f-71b092d254c6 | Not Translated (0%) | This might be termed Know Your Vendor. | This might be termed Know Your Vendor. |
| 44258915f993-9a08-4f24-a839-7e62418ca871 | Not Translated (0%) | Management Information Systems and Reports | Management Information Systems and Reports |
| 44268f5d5bda-e57f-468a-8908-180e6327a2c2 | Not Translated (0%) | Firms, especially financial institutions, should have robust management information systems (MIS) to keep the board of directors and senior management informed of key risk indicators and processes. | Firms, especially financial institutions, should have robust management information systems (MIS) to keep the board of directors and senior management informed of key risk indicators and processes. |
| 44278f5d5bda-e57f-468a-8908-180e6327a2c2 | Not Translated (0%) | The board of directors and senior management are ultimately accountable for the success or failure of the sanctions compliance program. | The board of directors and senior management are ultimately accountable for the success or failure of the sanctions compliance program. |
| 44288f5d5bda-e57f-468a-8908-180e6327a2c2 | Not Translated (0%) | MIS can enable them to track issues and determine whether additional resources or responses are required. | MIS can enable them to track issues and determine whether additional resources or responses are required. |
| 44298f5d5bda-e57f-468a-8908-180e6327a2c2 | Not Translated (0%) | One metric may be the number of sanctions trainings conducted (or absences from training), the volume of wires processed, and the percentage of wires being investigated. | One metric may be the number of sanctions trainings conducted (or absences from training), the volume of wires processed, and the percentage of wires being investigated. |
| 44308f5d5bda-e57f-468a-8908-180e6327a2c2 | Not Translated (0%) | By working with management to develop meaningful MIS, they can make better strategic decisions and apply additional controls proactively. | By working with management to develop meaningful MIS, they can make better strategic decisions and apply additional controls proactively. |
| 4431eacf2841-4ae4-4ac2-8603-8d036150bbe2 | Not Translated (0%) | Additional Monitoring and Controls | Additional Monitoring and Controls |
| 44327c2ece45-7bac-43a4-b84a-4d4d9b42b4fa | Not Translated (0%) | There are some additional controls that can be used to mitigate sanctions risks. | There are some additional controls that can be used to mitigate sanctions risks. |
| 44337c2ece45-7bac-43a4-b84a-4d4d9b42b4fa | Not Translated (0%) | The first is ongoing monitoring and event-triggered monitoring of customers and third parties. | The first is ongoing monitoring and event-triggered monitoring of customers and third parties. |
| 44347c2ece45-7bac-43a4-b84a-4d4d9b42b4fa | Not Translated (0%) | This would include monitoring for AML purposes, which may lead to a sanctions investigation. | This would include monitoring for AML purposes, which may lead to a sanctions investigation. |
| 44357c2ece45-7bac-43a4-b84a-4d4d9b42b4fa | Not Translated (0%) | Effective ongoing monitoring measures also must take into account the frequently changing nature of sanctions restrictions and the targets to which they apply. | Effective ongoing monitoring measures also must take into account the frequently changing nature of sanctions restrictions and the targets to which they apply. |
| 44367c2ece45-7bac-43a4-b84a-4d4d9b42b4fa | Not Translated (0%) | These measures can help a business discover emerging sanctions threats in its customer population. | These measures can help a business discover emerging sanctions threats in its customer population. |
| 44377c2ece45-7bac-43a4-b84a-4d4d9b42b4fa | Not Translated (0%) | For example, by monitoring a customer’s beneficial ownership, a business can identify whether a beneficial owner has become sanctioned and the risk that poses to the customers. | For example, by monitoring a customer’s beneficial ownership, a business can identify whether a beneficial owner has become sanctioned and the risk that poses to the customers. |
| 44387c2ece45-7bac-43a4-b84a-4d4d9b42b4fa | Not Translated (0%) | Based on this information, it can place additional controls on the relationship, such as escalations and additional approvals, to prevent transactions from occurring that may result in sanctions violations. | Based on this information, it can place additional controls on the relationship, such as escalations and additional approvals, to prevent transactions from occurring that may result in sanctions violations. |
| 44397c2ece45-7bac-43a4-b84a-4d4d9b42b4fa | Not Translated (0%) | As a best practice, a business should incorporate updates to sanctions listings into its screening activities within 24 to 48 hours. | As a best practice, a business should incorporate updates to sanctions listings into its screening activities within 24 to 48 hours. |
| 44407c2ece45-7bac-43a4-b84a-4d4d9b42b4fa | Not Translated (0%) | During that 24 to 48 hours, if a business continues to engage in activity, it should review those transactions not screened with the most updated information. | During that 24 to 48 hours, if a business continues to engage in activity, it should review those transactions not screened with the most updated information. |
| 44417c2ece45-7bac-43a4-b84a-4d4d9b42b4fa | Not Translated (0%) | If any sanctioned activity was processed, businesses should report and disclose that activity to regulators. | If any sanctioned activity was processed, businesses should report and disclose that activity to regulators. |
| 444216702e69-2793-46c3-8d92-c732aeae8ffb | Not Translated (0%) | Event-triggered monitoring is an internal control used to mitigate sanctions risks. | Event-triggered monitoring is an internal control used to mitigate sanctions risks. |
| 444316702e69-2793-46c3-8d92-c732aeae8ffb | Not Translated (0%) | It occurs whenever relevant information about an existing customer (e.g., its jurisdiction of operation) changes, therefore requiring an interim review of information prior to a scheduled review. | It occurs whenever relevant information about an existing customer (e.g., its jurisdiction of operation) changes, therefore requiring an interim review of information prior to a scheduled review. |
| 444438059068-5a41-4798-91e4-b35ad7cb008d | Not Translated (0%) | An effective sanctions monitoring program incorporates these two types of monitoring to ensure that any changes to sanctions lists or customers are identified and handled in a timely way. | An effective sanctions monitoring program incorporates these two types of monitoring to ensure that any changes to sanctions lists or customers are identified and handled in a timely way. |
| 4445378efa7e-be32-4b2a-9f20-bae876baf79d | Not Translated (0%) | Another control is the “four eyes” or “second pair of eyes” principle. | Another control is the “four eyes” or “second pair of eyes” principle. |
| 4446378efa7e-be32-4b2a-9f20-bae876baf79d | Not Translated (0%) | This principle is often applied when sanctions screening identifies a possible match between a customer and a name on a sanctions list. | This principle is often applied when sanctions screening identifies a possible match between a customer and a name on a sanctions list. |
| 4447378efa7e-be32-4b2a-9f20-bae876baf79d | Not Translated (0%) | One staff member will conduct the initial review, and a second person will review the work performed to verify its accuracy. | One staff member will conduct the initial review, and a second person will review the work performed to verify its accuracy. |
| 444889b20f96-3355-4431-a628-54f5202ccd65 | Not Translated (0%) | Another control involves the use of clauses or contract wording that warrants that the party signing does not perform work with sanctions targets or countries, and that they will maintain an effective sanctions compliance program. | Another control involves the use of clauses or contract wording that warrants that the party signing does not perform work with sanctions targets or countries, and that they will maintain an effective sanctions compliance program. |
| 444989b20f96-3355-4431-a628-54f5202ccd65 | Not Translated (0%) | These provisions normally allow the business to exit the relationship, without penalty, if it is discovered that the party is, in fact, a sanctions target or has violated a sanctions restriction. | These provisions normally allow the business to exit the relationship, without penalty, if it is discovered that the party is, in fact, a sanctions target or has violated a sanctions restriction. |
| 4450c3a29eb8-f4f7-4ec2-8ed5-6e5fca2f35bf | Not Translated (0%) | These controls, however, can be of limited effect. | These controls, however, can be of limited effect. |
| 4451c3a29eb8-f4f7-4ec2-8ed5-6e5fca2f35bf | Not Translated (0%) | Recall that it is not possible to transfer liability for sanctions compliance to others. | Recall that it is not possible to transfer liability for sanctions compliance to others. |
| 4452c3a29eb8-f4f7-4ec2-8ed5-6e5fca2f35bf | Not Translated (0%) | In addition, some countries have laws preventing reliance on these types of clauses, as they are considered to act as a boycott, which is illegal. | In addition, some countries have laws preventing reliance on these types of clauses, as they are considered to act as a boycott, which is illegal. |
| 445373826a55-bf30-4d02-a4d7-83ad66a75e2b | Not Translated (0%) | An organization must monitor continually, so it is aware of changes to ownership and can ensure that owners are screened against relevant sanctions lists in a timely manner. | An organization must monitor continually, so it is aware of changes to ownership and can ensure that owners are screened against relevant sanctions lists in a timely manner. |
| 44543a2825e9-5d93-4362-99d5-451eb3de568f | Not Translated (0%) | Name Screening | Name Screening |
| 4455d353466c-5347-40fe-ac44-92f0d75e8c7a | Not Translated (0%) | shows OFAC’s recommended process for name screening, which applies an assessment technique described as a process of elimination. | shows OFAC’s recommended process for name screening, which applies an assessment technique described as a process of elimination. |
| 4456e0cb3705-fed3-4b84-93c1-5ae3a8cbe6c2 | Not Translated (0%) | Name Screening | Name Screening |
| 4457d631c0ce-0962-4ff5-a6d0-4a389f64a297 | Not Translated (0%) | It is important to remember that the goal when assessing hits is to verify whether the customer or supplier is the same party identified on a sanctions list. | It is important to remember that the goal when assessing hits is to verify whether the customer or supplier is the same party identified on a sanctions list. |
| 4458d631c0ce-0962-4ff5-a6d0-4a389f64a297 | Not Translated (0%) | The financial institution should already have collected information about the customer or supplier, and that information should be referenced first to determine whether the hit is a true match. | The financial institution should already have collected information about the customer or supplier, and that information should be referenced first to determine whether the hit is a true match. |
| 4459d631c0ce-0962-4ff5-a6d0-4a389f64a297 | Not Translated (0%) | In addition, internet research can be undertaken—and supplemented with other publicly available information—in order to confirm whether the person identified by a name screening is the same person as the customer. | In addition, internet research can be undertaken—and supplemented with other publicly available information—in order to confirm whether the person identified by a name screening is the same person as the customer. |
| 44604e13b160-5e6d-448e-905c-e1ed2629e740 | Not Translated (0%) | Naming Conventions | Naming Conventions |
| 4461fc22fa01-076d-4484-ac7d-71771cbff002 | Not Translated (0%) | Naming conventions are an important aspect of sanctions name screening. | Naming conventions are an important aspect of sanctions name screening. |
| 4462fc22fa01-076d-4484-ac7d-71771cbff002 | Not Translated (0%) | Naming conventions are the various ways an individual’s names are given to or used by them. | Naming conventions are the various ways an individual’s names are given to or used by them. |
| 4463fc22fa01-076d-4484-ac7d-71771cbff002 | Not Translated (0%) | Names can be presented in many ways, largely dependent upon the country or cultural norms of the country where the individual was born or raised. | Names can be presented in many ways, largely dependent upon the country or cultural norms of the country where the individual was born or raised. |
| 4464fc22fa01-076d-4484-ac7d-71771cbff002 | Not Translated (0%) | presents examples of different ways in which names can be presented. | presents examples of different ways in which names can be presented. |
| 4465a0a2718a-33e7-42b8-aed7-4b3a80471446 | Not Translated (0%) | Sanctions Name Screening – Naming Conventions | Sanctions Name Screening – Naming Conventions |
| 4466e587ffec-4955-427e-abc3-5a9c5c61cf47 | Not Translated (0%) | Country | Country |
| 4467320d4ac8-aca5-4fc8-86f0-474e45a7a597 | Not Translated (0%) | First name | First name |
| 4468cf8cd524-76ec-4b39-9c6e-8b36a7b7004b | Not Translated (0%) | Surname | Surname |
| 4469c208e515-5668-45ea-a242-d93736820a14 | Not Translated (0%) | Russia | Russia |
| 4470effec0ff-7e0b-4d98-82e7-f479221fb7c0 | Not Translated (0%) | Ivan Boris Malkovitch Ivan Putin | Ivan Boris Malkovitch Ivan Putin |
| 44712eae74f9-ffa4-4204-a29b-26950930d819 | Not Translated (0%) | Ivan plus father’s first name that becomes a patronymic | Ivan plus father’s first name that becomes a patronymic |
| 4472fea93767-c44f-4d1c-a832-21704b28ed30 | Not Translated (0%) | (Borisovich (Borisovych)/ Borisovna) Ivan | (Borisovich (Borisovych)/ Borisovna) Ivan |
| 4473c50a2e6e-9bb0-4baa-ab4e-2786c1ba25c1 | Not Translated (0%) | Malkovitch | Malkovitch |
| 447459de09a0-7260-40fc-a096-592c3d1bdc27 | Not Translated (0%) | Putin (male); Putina (female) | Putin (male); Putina (female) |
| 44754a2a24c1-07d7-49bd-a640-00915b18a9d7 | Not Translated (0%) | Spanish Countries | Spanish Countries |
| 447681fbe206-f7fa-446a-ac09-33092408dd08 | Not Translated (0%) | Julio Raul Antonio-Arbo Garcias-Iglesias | Julio Raul Antonio-Arbo Garcias-Iglesias |
| 447722034b2e-95b9-4e5b-9301-a721502f24d9 | Not Translated (0%) | Julio Raul | Julio Raul |
| 44787344b64e-3172-4bda-869d-632757202cc1 | Not Translated (0%) | Might only use one of these names | Might only use one of these names |
| 4479d60c9b7e-b4d6-48ed-88b1-82808bf9008a | Not Translated (0%) | Antonio – Arbo (Father’s surname) Garcias-Iglesias (Mother’s surname) Might only use father’s surname | Antonio – Arbo (Father’s surname) Garcias-Iglesias (Mother’s surname) Might only use father’s surname |
| 44806c14f997-0ba8-493f-bd60-c2302117f37c | Not Translated (0%) | It is clear from these examples that names are not necessarily recorded in the order of first name, middle name, and surname. | It is clear from these examples that names are not necessarily recorded in the order of first name, middle name, and surname. |
| 44816c14f997-0ba8-493f-bd60-c2302117f37c | Not Translated (0%) | An organization should consider these variations when assessing possible hits identified during the screening process. | An organization should consider these variations when assessing possible hits identified during the screening process. |
| 44828f7db4df-ae35-4145-9d9e-8f3693d3bd9e | Not Translated (0%) | Transliteration | Transliteration |
| 4483feb28c83-cdd3-4503-962b-27641ab23885 | Not Translated (0%) | Transliteration is the conversion of text from one script into another, for example, a document written in Arabic characters that is converted into Cyrillic script. | Transliteration is the conversion of text from one script into another, for example, a document written in Arabic characters that is converted into Cyrillic script. |
| 4484feb28c83-cdd3-4503-962b-27641ab23885 | Not Translated (0%) | This phenomenon can present a name screening challenge. | This phenomenon can present a name screening challenge. |
| 4485feb28c83-cdd3-4503-962b-27641ab23885 | Not Translated (0%) | It is important to recognize the cultural complexity of names and how they affect sanctions screening. | It is important to recognize the cultural complexity of names and how they affect sanctions screening. |
| 4486feb28c83-cdd3-4503-962b-27641ab23885 | Not Translated (0%) | There can be many different English spellings of the name “Mohammed,” for example, Mohamed, Muhammed, and Muhamid. | There can be many different English spellings of the name “Mohammed,” for example, Mohamed, Muhammed, and Muhamid. |
| 4487cbbdf0a0-bb65-4855-811e-5b873b028258 | Not Translated (0%) | Romanization | Romanization |
| 448867f6875c-870e-42d0-86cc-6e3569e226ce | Not Translated (0%) | Romanization refers to the process of taking a different writing system (i.e., one that often does not use the Latin A–Z alphabet) and converting it into Latin script—that is, converting writing into the script that languages, such as English, are written in today. | Romanization refers to the process of taking a different writing system (i.e., one that often does not use the Latin A–Z alphabet) and converting it into Latin script—that is, converting writing into the script that languages, such as English, are written in today. |
| 448967f6875c-870e-42d0-86cc-6e3569e226ce | Not Translated (0%) | The challenge arises when scripts do not have equivalent letters or symbols. | The challenge arises when scripts do not have equivalent letters or symbols. |
| 449067f6875c-870e-42d0-86cc-6e3569e226ce | Not Translated (0%) | As a result, there can be variations in the spelling of names and words, even when they’re written in the standard alphabet, depending upon how they have been transliterated. | As a result, there can be variations in the spelling of names and words, even when they’re written in the standard alphabet, depending upon how they have been transliterated. |
| 449175d93fca-45c3-4a97-9cf1-e8c59c8665bf | Not Translated (0%) | Payment Screening | Payment Screening |
| 4492491954c5-7cfc-4254-aeba-0a28932ae824 | Not Translated (0%) | Payment screening is the screening or filtering of relevant payment instructions prior to their execution in order to prevent making funds available in breach of sanctions, embargoes, and other measures. | Payment screening is the screening or filtering of relevant payment instructions prior to their execution in order to prevent making funds available in breach of sanctions, embargoes, and other measures. |
| 4493491954c5-7cfc-4254-aeba-0a28932ae824 | Not Translated (0%) | This type of screening activity focuses upon transaction messages. | This type of screening activity focuses upon transaction messages. |
| 4494491954c5-7cfc-4254-aeba-0a28932ae824 | Not Translated (0%) | Each organization has its own process and standards of how sanctions payment screening is undertaken. | Each organization has its own process and standards of how sanctions payment screening is undertaken. |
| 44957030a370-1c22-4f2c-938f-90a10120a91a | Not Translated (0%) | Sources | Sources |
| 4496700f91c3-c076-4087-884b-468ca85d7299 | Not Translated (0%) | Generally, payment screening tools monitor payments systems and communication protocols, such as: | Generally, payment screening tools monitor payments systems and communication protocols, such as: |
| 4497a31f34e9-9a4f-4caa-8f47-dd1ddb5bb4af | Not Translated (0%) | The Clearing House Interbank Payments System (CHIPS) | The Clearing House Interbank Payments System (CHIPS) |
| 44988a148ef6-c86b-4bd9-83ff-986ad814ee5c | Not Translated (0%) | Single Euro Payments Area (SEPA) credit transfer | Single Euro Payments Area (SEPA) credit transfer |
| 449920e816da-833c-40d4-94d7-f204d1b750e7 | Not Translated (0%) | The Federal Reserve’s Fedwire | The Federal Reserve’s Fedwire |
| 4500b68e1cd5-2568-4021-a481-e5007e830d55 | Not Translated (0%) | The Society for the Worldwide Interbank Financial Telecommunications Code (SWIFT) | The Society for the Worldwide Interbank Financial Telecommunications Code (SWIFT) |
| 4501c97ad611-c8c8-4b97-9f8e-8ce86f609155 | Not Translated (0%) | Regional systems (e.g., the Large Value Transfer System in Canada) | Regional systems (e.g., the Large Value Transfer System in Canada) |
| 450288155b08-a5be-49e7-855f-3f5593f12207 | Not Translated (0%) | Other payment ecosystems (e.g., PayPal) | Other payment ecosystems (e.g., PayPal) |
| 4503c6812c44-99b8-47a2-af7f-39956e98e107 | Not Translated (0%) | Each of these payment systems has its own protocols concerning data, information, and templates for payments. | Each of these payment systems has its own protocols concerning data, information, and templates for payments. |
| 4504c6812c44-99b8-47a2-af7f-39956e98e107 | Not Translated (0%) | A financial institution can accept and use more than one of these payment systems. | A financial institution can accept and use more than one of these payment systems. |
| 4505c792c2d8-6986-41b9-8f1e-f1d64286c31d | Not Translated (0%) | SWIFT Messages | SWIFT Messages |
| 45060d2f57e5-5a2c-48f7-985f-cd69bec97fed | Not Translated (0%) | SWIFT is the most well-known provider of financial messaging services. | SWIFT is the most well-known provider of financial messaging services. |
| 45070d2f57e5-5a2c-48f7-985f-cd69bec97fed | Not Translated (0%) | SWIFT messages have a predefined, structured format with set fields. | SWIFT messages have a predefined, structured format with set fields. |
| 45080d2f57e5-5a2c-48f7-985f-cd69bec97fed | Not Translated (0%) | Some fields can only contain specific values, numbers, etc., and others allow for the entry of free text. | Some fields can only contain specific values, numbers, etc., and others allow for the entry of free text. |
| 4509534966fd-ac9c-406c-a0c7-4ade895678c0 | Not Translated (0%) | SWIFT messages are predefined in two ways. | SWIFT messages are predefined in two ways. |
| 4510534966fd-ac9c-406c-a0c7-4ade895678c0 | Not Translated (0%) | First, SWIFT has developed a set of formats for messages based on the type of commercial activity involved, as shown in <10495/>. | First, SWIFT has developed a set of formats for messages based on the type of commercial activity involved, as shown in <10495/>. |
| 45116cb47562-91f4-42c4-b0ef-24cbed21dcb4 | Not Translated (0%) | SPS–SWIFT Messages | SPS–SWIFT Messages |
| 4512a821664c-d091-4af2-98e7-9946b8b35f86 | Not Translated (0%) | Message Type | Message Type |
| 4513097510ad-7a5e-40c7-8a0b-8bc7cc6aaf5a | Not Translated (0%) | Description | Description |
| 4514e32bd9d9-7998-4fd3-aeeb-e737f82b2759 | Not Translated (0%) | MT0xx | MT0xx |
| 45150dfb075b-3e9d-4292-b005-35a7a51a4eaf | Not Translated (0%) | System Messages | System Messages |
| 4516127c1b09-cf6b-4959-b6ef-dc15c25f1fbb | Not Translated (0%) | MT1xx | MT1xx |
| 45175c1cb939-e0fc-454f-906f-9f1c53f69f66 | Not Translated (0%) | Customer Payments and Cheques | Customer Payments and Cheques |
| 4518c652f762-a5c8-4cd6-aa1c-9e9af5d11e45 | Not Translated (0%) | MT2xx | MT2xx |
| 4519138366eb-d4c5-4d22-bbf0-1d796e2a5838 | Not Translated (0%) | Financial Institution Transfers | Financial Institution Transfers |
| 4520951f3606-49fd-48d8-8e9e-af205b416af5 | Not Translated (0%) | MT3xx | MT3xx |
| 4521f81373a4-26d5-4fe6-876c-0a21b336dcb0 | Not Translated (0%) | Treasury Markets | Treasury Markets |
| 45220821a65f-c28e-4da1-a016-da98cd9368dd | Not Translated (0%) | MT4xx | MT4xx |
| 4523cd733a21-70d1-4441-b5c3-0370d215f1fc | Not Translated (0%) | Collection and Cash Letters | Collection and Cash Letters |
| 45248332f661-b8c2-4ad2-afb7-e2c57affafe2 | Not Translated (0%) | MT5xx | MT5xx |
| 4525751a3e15-05f4-4b28-ad62-b32eb85d05a7 | Not Translated (0%) | Securities Markets | Securities Markets |
| 45266e2c7c1f-a418-4c0c-8b63-bd2303e98515 | Not Translated (0%) | MT6xx | MT6xx |
| 45275f60da50-cb66-4686-9ade-6912f3e0e3d4 | Not Translated (0%) | Treasury Markets – Metals and Syndications | Treasury Markets – Metals and Syndications |
| 4528409e95db-8d88-444f-a8fe-6ef0b4600735 | Not Translated (0%) | MT7xx | MT7xx |
| 45297e2af495-4f0f-4db7-ad3a-783314b0c1c2 | Not Translated (0%) | Documentary Credits and Guarantees | Documentary Credits and Guarantees |
| 4530bd4d3bb9-a3eb-4a59-a3d1-c970634ac9f3 | Not Translated (0%) | MT8xx | MT8xx |
| 4531b20a7190-e364-4bf2-a040-8dfd3ed4e548 | Not Translated (0%) | Travelers Checks | Travelers Checks |
| 45322f1d1a33-e7c2-4f1b-8c72-086e925e4b84 | Not Translated (0%) | MT9xx | MT9xx |
| 4533674bc2e0-2bc9-48d7-97bb-ad19acae6638 | Not Translated (0%) | Cash Management and Customer Status | Cash Management and Customer Status |
| 45348f50344e-c028-4b2b-ac4b-1757b046c27b | Not Translated (0%) | The key to the formats is the first number that follows “MT.” | The key to the formats is the first number that follows “MT.” |
| 45358f50344e-c028-4b2b-ac4b-1757b046c27b | Not Translated (0%) | For example, a SWIFT message with the format MT500 is a transaction related to securities markets. | For example, a SWIFT message with the format MT500 is a transaction related to securities markets. |
| 45368f50344e-c028-4b2b-ac4b-1757b046c27b | Not Translated (0%) | Every message type contains required and optional fields with the information inserted either manually by operator or in an automated way by an institution. | Every message type contains required and optional fields with the information inserted either manually by operator or in an automated way by an institution. |
| 4537248cd76d-a34e-4f58-b454-0c1b1e2076ea | Not Translated (0%) | Second, SWIFT messages are designed with predefined fields. | Second, SWIFT messages are designed with predefined fields. |
| 4538248cd76d-a34e-4f58-b454-0c1b1e2076ea | Not Translated (0%) | shows a simplified summary of the numbers for those fields in a SWIFT message and the information that should be entered into that field. | shows a simplified summary of the numbers for those fields in a SWIFT message and the information that should be entered into that field. |
| 45399c1f6a34-d303-4515-9f11-d6d14fb4e6db | Not Translated (0%) | SPS–SWIFT Messages–MT103 Fields | SPS–SWIFT Messages–MT103 Fields |
| 4540cf3af838-80b8-43a7-8d83-70dbb8b116e0 | Not Translated (0%) | Field | Field |
| 4541423d3b56-3053-4dcf-9845-eea92eb69a0a | Not Translated (0%) | Field Name | Field Name |
| 454281a9bfe0-3c8e-452e-9a8e-2b1678c17f3c | Not Translated (0%) | :20 | :20 |
| 4543466f2dd0-eb25-40a3-84a3-29c5099e75e6 | Not Translated (0%) | Transaction Reference Number | Transaction Reference Number |
| 45441c4fb350-c202-4ae5-bdbb-502e1a40ceb5 | Not Translated (0%) | :23B | :23B |
| 454558d94bf2-6e22-4962-9a89-c83f8aab34e6 | Not Translated (0%) | Bank Operation Code | Bank Operation Code |
| 4546484e4595-8c0c-4169-93fe-aa33f6024d27 | Not Translated (0%) | :32A | :32A |
| 4547942c3207-1058-4707-8132-e550feb8d22e | Not Translated (0%) | Value Data / Currency /Interbank Settled | Value Data / Currency /Interbank Settled |
| 4548dc3cb296-cd34-462c-9c9b-f1dc7b91ae6e | Not Translated (0%) | :33B | :33B |
| 4549f12d2570-d785-4298-a944-988198cb0194 | Not Translated (0%) | Currency / Original Ordered Amount | Currency / Original Ordered Amount |
| 4550d75e899e-5b64-4337-9200-7b640a6084f3 | Not Translated (0%) | :50A, F or K | :50A, F or K |
| 4551c5a3c885-64d1-4cb0-b402-4a0d71227446 | Not Translated (0%) | Ordering Customer (Payer) | Ordering Customer (Payer) |
| 4552a6749c0a-e610-4fca-9934-0ac09f6ab3b8 | Not Translated (0%) | :52A or D | :52A or D |
| 45531be885ce-c454-4105-b0c2-d01d176275f0 | Not Translated (0%) | Ordering Institution (Payer’s Bank) | Ordering Institution (Payer’s Bank) |
| 4554a91c0082-aac8-4014-9753-246386ebd07b | Not Translated (0%) | :53A, B or D | :53A, B or D |
| 4555891e6494-3f67-4001-b5da-a812af66ae27 | Not Translated (0%) | Sender’s Correspondent (Bank) | Sender’s Correspondent (Bank) |
| 4556761f1c88-4e05-48a8-9d72-4dd87cc8d669 | Not Translated (0%) | :54A, B or D | :54A, B or D |
| 455757b5d37b-6a34-4021-945d-8ddd57527d37 | Not Translated (0%) | Receiver’s Correspondent (Bank) | Receiver’s Correspondent (Bank) |
| 45583f3224c2-22ef-4970-80f2-c2626bcfaf07 | Not Translated (0%) | :56A, C or D | :56A, C or D |
| 4559d3ebbaf9-a137-4976-a9df-1671504ba58e | Not Translated (0%) | Intermediary (Bank) | Intermediary (Bank) |
| 4560b2b75d22-4133-4ae4-9b5a-749e396d383b | Not Translated (0%) | :57A, B, C or D | :57A, B, C or D |
| 456142eecf9f-a030-4386-83e7-80c2440487ff | Not Translated (0%) | Account with Institution (Beneficiary’s Bank) | Account with Institution (Beneficiary’s Bank) |
| 4562f5c643c7-fdd3-4031-ada7-2a909735cdae | Not Translated (0%) | :59 or 59A | :59 or 59A |
| 4563649c7557-5023-472a-b199-ddc9e3bbb0a4 | Not Translated (0%) | Beneficiary | Beneficiary |
| 4564950460aa-efe7-43eb-a8fa-b61b473d68f2 | Not Translated (0%) | :70 | :70 |
| 4565ed0962ee-7407-4f36-8aa2-90aac8101c7d | Not Translated (0%) | Remittance Information (Payment Reference) | Remittance Information (Payment Reference) |
| 456634a3bae2-f687-4afe-9caa-221c25ce43e7 | Not Translated (0%) | :71A | :71A |
| 456743405868-7274-480f-ba3d-30ce7fc0f263 | Not Translated (0%) | Details of Charges (BEN / OUR / SHA) | Details of Charges (BEN / OUR / SHA) |
| 4568013467c2-5f60-4341-8241-47d347c4dcce | Not Translated (0%) | :72 | :72 |
| 45691bd696f9-8473-4b03-9fac-7d861ca91eef | Not Translated (0%) | Sender to Receiver Information | Sender to Receiver Information |
| 4570eaf538d5-6890-4fe1-aa0f-bc31dd68dfec | Not Translated (0%) | :77B | :77B |
| 457116425c1f-6074-4519-9b6d-ee40b0af6d08 | Not Translated (0%) | Regulatory Reporting | Regulatory Reporting |
| 4572ed68eb8e-23cd-4e45-99de-7e3ed9198eac | Not Translated (0%) | MT103 messages typically are used for wire transfer payments. | MT103 messages typically are used for wire transfer payments. |
| 4573ed68eb8e-23cd-4e45-99de-7e3ed9198eac | Not Translated (0%) | Refer to the example in <10802/>: | Refer to the example in <10802/>: |
| 457401632baa-40d4-4384-ab1d-998bd01d1fee | Not Translated (0%) | Field 20, together with a date, is a helpful way to locate SWIFT messages. | Field 20, together with a date, is a helpful way to locate SWIFT messages. |
| 457537acc0ac-2a74-497a-98c9-6fe46dd13642 | Not Translated (0%) | Field 23 can determine whether certain sanctions apply. | Field 23 can determine whether certain sanctions apply. |
| 457637acc0ac-2a74-497a-98c9-6fe46dd13642 | Not Translated (0%) | If US dollars were used, US sanctions restrictions would apply. | If US dollars were used, US sanctions restrictions would apply. |
| 457793e0758c-a520-465f-a3f3-13b1d832462f | Not Translated (0%) | Fields 50 and 59 contain information about the sending and receiving parties. | Fields 50 and 59 contain information about the sending and receiving parties. |
| 457893e0758c-a520-465f-a3f3-13b1d832462f | Not Translated (0%) | These fields must contain a set of minimum information required by the EU regulation on wire transfers and FATF Recommendation 16. | These fields must contain a set of minimum information required by the EU regulation on wire transfers and FATF Recommendation 16. |
| 45793d10c58b-1d1f-4831-92db-8cef47fa3a81 | Not Translated (0%) | Field 70 contains remittance information that is a free text field. | Field 70 contains remittance information that is a free text field. |
| 45803d10c58b-1d1f-4831-92db-8cef47fa3a81 | Not Translated (0%) | This field and any other free text fields can be used to provide additional information about a payment. | This field and any other free text fields can be used to provide additional information about a payment. |
| 458189f96c01-5121-4e3a-81b0-a9717c8c5093 | Not Translated (0%) | SPS–SWIFT Messages–MT103 Example | SPS–SWIFT Messages–MT103 Example |
| 458279cf0729-3440-4473-b028-31041f2af269 | Not Translated (0%) | Field | Field |
| 4583522d977c-69cc-4cc8-9d74-87682fe679f6 | Not Translated (0%) | Subject | Subject |
| 4584b41955a8-d7b0-4b28-b29a-73ef6e800190 | Not Translated (0%) | Description | Description |
| 4585143b77ab-1e48-4f94-ae05-ab8ef30bf493 | Not Translated (0%) | 20 | 20 |
| 4586190f3958-65a2-45f3-b154-d225fe17ae88 | Not Translated (0%) | Unique Reference No. | Unique Reference No. |
| 45876377ca77-24bb-4f6a-8dde-e7b5eb14371c | Not Translated (0%) | Used for tracking transaction | Used for tracking transaction |
| 4588ed96a806-be4f-4cd2-a685-0a5993d1a226 | Not Translated (0%) | 23 | 23 |
| 45898abbe973-ae26-4aed-8137-759fc4ae5cf3 | Not Translated (0%) | Value Date and Payment | Value Date and Payment |
| 4590fbe6620a-4e85-4db2-93c7-91cd28eaab25 | Not Translated (0%) | Value date of payment, currency involved & the amount “GBP1000,11” vs. GBBP1000,11 | Value date of payment, currency involved & the amount “GBP1000,11” vs. GBBP1000,11 |
| 459138740e6d-4aef-4a55-b518-0cbf8c2f5ef0 | Not Translated (0%) | 50 | 50 |
| 4592d80fab44-9248-45ad-98cf-122301ba24cd | Not Translated (0%) | Sending Party (payer) | Sending Party (payer) |
| 4593e1b7e6f0-5d43-42a4-86fa-55262c7cc27c | Not Translated (0%) | Required information to identify sender to comply with FATF R.16 / EU Reg. on Wire Transfers 2015/847 | Required information to identify sender to comply with FATF R.16 / EU Reg. on Wire Transfers 2015/847 |
| 45946fca2659-ae78-46fe-b103-37fc56883901 | Not Translated (0%) | 59 | 59 |
| 4595eadaba20-766a-4cfe-b402-2de5890d5d3a | Not Translated (0%) | Recipient | Recipient |
| 4596c1f29cca-4358-4e50-bce0-53ec75f9e9cd | Not Translated (0%) | 70, 72 | 70, 72 |
| 4597ef4ef655-b2b0-48ad-b3c2-e56c7fb4f42d | Not Translated (0%) | Payment Description | Payment Description |
| 4598b8f9a5a8-d3fb-40ef-a7b1-2e7247d52659 | Not Translated (0%) | Free text field | Free text field |
| 4599d00c8d72-abd3-464b-8d74-a035322755f3 | Not Translated (0%) | Certain fields in a SWIFT payment message tend to be the most relevant for screening, such as the ordering customer, beneficiary, and message details fields, which need to be screened against all relevant sanctions lists. | Certain fields in a SWIFT payment message tend to be the most relevant for screening, such as the ordering customer, beneficiary, and message details fields, which need to be screened against all relevant sanctions lists. |
| 4600d00c8d72-abd3-464b-8d74-a035322755f3 | Not Translated (0%) | In the example shown in <10919/>, hits are likely to be generated by field 50, where the AST has identified the word “CUBA". | In the example shown in <10919/>, hits are likely to be generated by field 50, where the AST has identified the word “CUBA". |
| 4601d00c8d72-abd3-464b-8d74-a035322755f3 | Not Translated (0%) | It is part of the sender’s address in Panama. | It is part of the sender’s address in Panama. |
| 4602504ec56d-d1b7-49e0-9b03-985021ec1ec5 | Not Translated (0%) | SPS–SWIFT MT103 | SPS–SWIFT MT103 |
| 46031f8a412e-e232-443f-813f-559704e780b4 | Not Translated (0%) | Field | Field |
| 4604aaca4668-acf6-40ad-b1b6-c4a3ea108473 | Not Translated (0%) | Field Name | Field Name |
| 460515325178-3051-469a-90a9-646431321148 | Not Translated (0%) | Example | Example |
| 4606de59f19c-5974-4e59-8c57-f120e14f5e3c | Not Translated (0%) | Explanation | Explanation |
| 46076dbc59d9-dcef-47e2-ab78-1c35af16a4f9 | Not Translated (0%) | :20 | :20 |
| 4608a9e28ebb-fce1-458a-86c5-7367beaca4ad | Not Translated (0%) | Transaction Reference Number | Transaction Reference Number |
| 460982bd758f-8bc8-4011-933f-717afe8729d8 | Not Translated (0%) | 123456789191 | 123456789191 |
| 461054424d2f-903f-48ab-b959-1b141f88dea1 | Not Translated (0%) | :23B | :23B |
| 461172f1ecfc-058a-4bf4-940d-8e3d9a232aad | Not Translated (0%) | Bank Operation Code | Bank Operation Code |
| 4612f8a11482-8dcb-4be5-bb84-f67aa723ed0c | Not Translated (0%) | CRED | CRED |
| 4613e2bd0c96-75ca-43d7-8301-4db278331769 | Not Translated (0%) | :32A | :32A |
| 4614674da342-fe4a-4069-aea4-6a954af475cf | Not Translated (0%) | Date/Currency/Interbank Settled Amount | Date/Currency/Interbank Settled Amount |
| 46153fbdd9ec-7eff-455a-9d78-15cdf05cb040 | Not Translated (0%) | 180202USD25001,21 | 180202USD25001,21 |
| 4616b1ec01d6-e9d2-4460-82e8-2174409b39f0 | Not Translated (0%) | :33B | :33B |
| 461769856f4e-2abd-45b1-a978-a17cd785758e | Not Translated (0%) | Currency/Original Ordered Amount | Currency/Original Ordered Amount |
| 461817d4f893-8b45-4f53-870e-50464dac5ea2 | Not Translated (0%) | USD25001,21 | USD25001,21 |
| 461955fda08e-4c22-40d5-bf11-8e599e05064f | Not Translated (0%) | :50A | :50A |
| 4620b1c293e6-7295-4c71-a4f6-7e7500e905c7 | Not Translated (0%) | or | or |
| 462167919c8d-24ab-4a7d-b9c6-faa20371bccf | Not Translated (0%) | :50K | :50K |
| 4622fae51014-54bd-411d-8cd3-d499a9baf7d9 | Not Translated (0%) | Ordering Customer | Ordering Customer |
| 46234eb5119a-afed-4929-8bdc-5a264bea9a5e | Not Translated (0%) | 00012345678912 | 00012345678912 |
| 46243175037a-3102-4e86-b611-b250f22db944 | Not Translated (0%) | SENOR JOHN DOE | SENOR JOHN DOE |
| 4625f1a6529c-a52b-46fd-8a62-32813eaf2886 | Not Translated (0%) | AVENIDA CUBA Y CALLE 38 ESTE NUMERO 38-29 | AVENIDA CUBA Y CALLE 38 ESTE NUMERO 38-29 |
| 4626cf56eda6-5932-4455-b37d-6d0af20d76d1 | Not Translated (0%) | POSTAL 0831-00947 PAITILLA, PANAMA, PANAMA | POSTAL 0831-00947 PAITILLA, PANAMA, PANAMA |
| 46277ca24a8f-7629-4104-bd50-5494cdd12f95 | Not Translated (0%) | False positive OFAC hit on Avenida Cuba which is an avenue in Panama City and doesn’t represent the country of Cuba. | False positive OFAC hit on Avenida Cuba which is an avenue in Panama City and doesn’t represent the country of Cuba. |
| 46287ca24a8f-7629-4104-bd50-5494cdd12f95 | Not Translated (0%) | Sometimes tools can address this through inequivalence matching functionality. | Sometimes tools can address this through inequivalence matching functionality. |
| 4629cc903220-c50a-4a69-a3b8-a3ef9d9b6cb4 | Not Translated (0%) | In another example, <11052/>, a hit was detected in Field 52, which shows the sending bank’s SWIFT or BIC code. | In another example, <11052/>, a hit was detected in Field 52, which shows the sending bank’s SWIFT or BIC code. |
| 4630cc903220-c50a-4a69-a3b8-a3ef9d9b6cb4 | Not Translated (0%) | The AST noted that this code was designated to a bank called BANCO DE CREDITO Y COMERCIO, located in Havana, Cuba. | The AST noted that this code was designated to a bank called BANCO DE CREDITO Y COMERCIO, located in Havana, Cuba. |
| 4631cc903220-c50a-4a69-a3b8-a3ef9d9b6cb4 | Not Translated (0%) | The AST could be set to identify that the fifth and sixth character of the SWIFT code represents a country, and in this case CU is CUBA. | The AST could be set to identify that the fifth and sixth character of the SWIFT code represents a country, and in this case CU is CUBA. |
| 4632cc903220-c50a-4a69-a3b8-a3ef9d9b6cb4 | Not Translated (0%) | Instead of a SWIFT code, a bank’s name and address might generate a red flag. | Instead of a SWIFT code, a bank’s name and address might generate a red flag. |
| 4633cc903220-c50a-4a69-a3b8-a3ef9d9b6cb4 | Not Translated (0%) | For example, field 57 is used to identify correspondent banks used along the payment chain. | For example, field 57 is used to identify correspondent banks used along the payment chain. |
| 4634cc903220-c50a-4a69-a3b8-a3ef9d9b6cb4 | Not Translated (0%) | If the SWIFT code for CITIBANK is CITIUS33, the AST will not generate a hit. | If the SWIFT code for CITIBANK is CITIUS33, the AST will not generate a hit. |
| 4635a7909823-dadc-4a8b-88a4-3aa10017c20b | Not Translated (0%) | SPS–SWIFT MT103 | SPS–SWIFT MT103 |
| 46365e8aeefb-ca96-4105-addd-287d7aaf023e | Not Translated (0%) | Field Tag | Field Tag |
| 4637068fcc1d-a600-4d14-b2b0-74b2c2ffd69b | Not Translated (0%) | Field Name | Field Name |
| 463812df5626-b52d-4316-9e14-19cb6914ecd4 | Not Translated (0%) | Example | Example |
| 46392937b703-e4fb-42fb-9100-d2f229da7d13 | Not Translated (0%) | Explanation | Explanation |
| 4640198c3f0d-e24e-4518-bb1d-17ab1def9b74 | Not Translated (0%) | :52A | :52A |
| 464144959431-9c4c-40dc-ba59-f642eba41cae | Not Translated (0%) | Ordering Institution | Ordering Institution |
| 4642ecac01e3-a5c8-4c51-99fb-86229bdddec5 | Not Translated (0%) | BDCRCUHH | BDCRCUHH |
| 4643f0bf0ca4-de71-4e68-a8a1-02277a336bad | Not Translated (0%) | BANCO DE CREDITO Y COMERCIO is a bank located in Havana Cuba. | BANCO DE CREDITO Y COMERCIO is a bank located in Havana Cuba. |
| 4644f0bf0ca4-de71-4e68-a8a1-02277a336bad | Not Translated (0%) | The first 4 characters of a SWIFT code is the bank identifier and the 5th and 6th characters are the country code which is CU for Cuba in this case. | The first 4 characters of a SWIFT code is the bank identifier and the 5th and 6th characters are the country code which is CU for Cuba in this case. |
| 4645678f3425-e986-421f-9b87-d2aa2722862e | Not Translated (0%) | :53B | :53B |
| 4646ac8ba34a-fc93-4e1c-918b-e8104212dbb3 | Not Translated (0%) | Sender’s Correspondent | Sender’s Correspondent |
| 46473b5b1b6b-8bcd-41f6-b5d4-eacdea1bc911 | Not Translated (0%) | CITIUS33 | CITIUS33 |
| 4648980acede-b3dc-42c5-95c1-7272fd9de633 | Not Translated (0%) | :56A | :56A |
| 4649b57621ea-2d11-447a-8960-4696ac46b896 | Not Translated (0%) | Intermediary | Intermediary |
| 465049eb05cd-0d4f-4afc-8f06-41e2251b0982 | Not Translated (0%) | MRMDUS33 | MRMDUS33 |
| 465185d71ea6-502b-4b35-bfd1-df8535b9f274 | Not Translated (0%) | :57A | :57A |
| 4652c743a38b-183a-45d1-aac4-93dd40d7b428 | Not Translated (0%) | Account with Institution or | Account with Institution or |
| 465350ecf955-8209-49b4-9aab-628c14545105 | Not Translated (0%) | EBILAED | EBILAED |
| 465452d46e08-85d5-49ae-8fd6-9744c00262f0 | Not Translated (0%) | In another example, <11159/>, field 59 lists an exchange house as the beneficial owner. | In another example, <11159/>, field 59 lists an exchange house as the beneficial owner. |
| 465552d46e08-85d5-49ae-8fd6-9744c00262f0 | Not Translated (0%) | However, field 72 identifies the real beneficiary as Joquin Loera. | However, field 72 identifies the real beneficiary as Joquin Loera. |
| 465652d46e08-85d5-49ae-8fd6-9744c00262f0 | Not Translated (0%) | This is one technique used to conceal the true beneficial owner. | This is one technique used to conceal the true beneficial owner. |
| 465752d46e08-85d5-49ae-8fd6-9744c00262f0 | Not Translated (0%) | It is helpful to look for words such as “further credit to” or “for the benefit of” in field 72. | It is helpful to look for words such as “further credit to” or “for the benefit of” in field 72. |
| 465852d46e08-85d5-49ae-8fd6-9744c00262f0 | Not Translated (0%) | In correspondent banking, this is an example of nesting. | In correspondent banking, this is an example of nesting. |
| 465952d46e08-85d5-49ae-8fd6-9744c00262f0 | Not Translated (0%) | In this example, the drug kingpin Joaquin Guzman Loera (“El Chapo”) is named in field 72. | In this example, the drug kingpin Joaquin Guzman Loera (“El Chapo”) is named in field 72. |
| 466052d46e08-85d5-49ae-8fd6-9744c00262f0 | Not Translated (0%) | His name is only missing the “A” in Joaquin. | His name is only missing the “A” in Joaquin. |
| 466152d46e08-85d5-49ae-8fd6-9744c00262f0 | Not Translated (0%) | Some algorithms would likely have detected this variation in spelling and identified this message as a strong hit by an AST. | Some algorithms would likely have detected this variation in spelling and identified this message as a strong hit by an AST. |
| 4662755df32f-62c4-4300-b0b2-b08fe21fcf7d | Not Translated (0%) | SPS–SWIFT MT103 | SPS–SWIFT MT103 |
| 4663ecd4b486-9555-4a27-b237-0e65d9295a07 | Not Translated (0%) | Field Tag | Field Tag |
| 4664d0934f44-87cc-4ea4-9d6a-713b250758ef | Not Translated (0%) | Field Name | Field Name |
| 4665c3507613-0ba5-4a32-8bbe-5fb39047f625 | Not Translated (0%) | Example | Example |
| 4666ab4dae5d-05a8-47e2-b975-aefbc89ee856 | Not Translated (0%) | Explanation | Explanation |
| 466738c15606-8d71-4d71-901c-998550873541 | Not Translated (0%) | :59 | :59 |
| 4668e1fc51c1-abb4-4c62-905c-9e0e9a756ee6 | Not Translated (0%) | or | or |
| 4669b755fe2c-484f-4e3b-9a5e-0c7b4d78a288 | Not Translated (0%) | :59A | :59A |
| 467073f49009-68ee-4205-bc01-53898a79910f | Not Translated (0%) | Beneficiary | Beneficiary |
| 467179ed08d3-6b06-472a-b671-9e93a7bf6aee | Not Translated (0%) | 12345678901 | 12345678901 |
| 467228c5dfe1-b48e-4aa2-9f53-fccf9e1819c1 | Not Translated (0%) | UAE Exchange House 123, Inc 123 Random St Dubai, UAE | UAE Exchange House 123, Inc 123 Random St Dubai, UAE |
| 46731fdf571a-480f-4201-b70b-e7dd6d2558f5 | Not Translated (0%) | Exchange House but not the real beneficiary! | Exchange House but not the real beneficiary! |
| 4674a4fec236-96d9-4b63-b239-1da9ae143881 | Not Translated (0%) | :70 | :70 |
| 467599c4aa46-0cf8-4a5c-8fc3-957d0bf69e43 | Not Translated (0%) | Remittance Information | Remittance Information |
| 46762e2ffe4e-bb8d-4d27-9d94-9b10a78f6089 | Not Translated (0%) | RFB/INVOICE 5555555 | RFB/INVOICE 5555555 |
| 4677b04362cd-4699-467e-b9b8-7d993c608701 | Not Translated (0%) | :71A | :71A |
| 4678ea7d8c77-6b3c-43d9-8b96-208b20ed45ba | Not Translated (0%) | Details of Charges | Details of Charges |
| 4679839013d5-3618-4ab5-b1bd-383929ea3699 | Not Translated (0%) | SHA | SHA |
| 46809263ca1e-cd80-4021-917b-42263f6df219 | Not Translated (0%) | :72 | :72 |
| 4681b9b8d4d7-7f29-43b0-bbcf-0c2b5b25b302 | Not Translated (0%) | Sender to Receiver Information | Sender to Receiver Information |
| 4682f04ea947-23ba-4085-ba21-ec98eadda812 | Not Translated (0%) | FOR BENEFIT OF JOQUIN GUZMAN LOERA | FOR BENEFIT OF JOQUIN GUZMAN LOERA |
| 46837483397d-769b-42e6-8318-50501faef2e6 | Not Translated (0%) | Key indicator words: | Key indicator words: |
| 46847483397d-769b-42e6-8318-50501faef2e6 | Not Translated (0%) | , further credit to, for benefit of etc. | , further credit to, for benefit of etc. |
| 4685580c5f20-14ac-4987-a7cf-a8d6ca61283e | Not Translated (0%) | Attempts to conceal name through spelling variations name | Attempts to conceal name through spelling variations name |
| 46868e0588bf-60ee-452f-8394-5358c6a93b64 | Not Translated (0%) | “JOAQUIN GUZMAN LOERA”, the infamous drug kingpin. | “JOAQUIN GUZMAN LOERA”, the infamous drug kingpin. |
| 4687d0a34ab7-5a7f-4e75-a73b-9da3fa3ef876 | Not Translated (0%) | Although it is important to screen all payment messages, some messages carry elevated levels of sanctions risks. | Although it is important to screen all payment messages, some messages carry elevated levels of sanctions risks. |
| 4688d0a34ab7-5a7f-4e75-a73b-9da3fa3ef876 | Not Translated (0%) | For example, the MT500 message series needs careful consideration, especially in relation to sectoral sanctions restrictions. | For example, the MT500 message series needs careful consideration, especially in relation to sectoral sanctions restrictions. |
| 4689d0a34ab7-5a7f-4e75-a73b-9da3fa3ef876 | Not Translated (0%) | For example, if an instrument issued by Sberbank, a named SSI, was referenced in an MT500 message, the message would need to be reviewed to verify whether it involved financial instruments restricted under the sectoral sanctions. | For example, if an instrument issued by Sberbank, a named SSI, was referenced in an MT500 message, the message would need to be reviewed to verify whether it involved financial instruments restricted under the sectoral sanctions. |
| 46902426bfe0-3f04-46f3-a608-79d07e969414 | Not Translated (0%) | When a hit is generated, a manual review must be undertaken of both the payment message and supplementary documentation to verify whether the restrictions apply and the transaction should be halted. | When a hit is generated, a manual review must be undertaken of both the payment message and supplementary documentation to verify whether the restrictions apply and the transaction should be halted. |
| 46918367373f-47f4-493e-ae01-19a3f2c8a5ef | Not Translated (0%) | Challenges | Challenges |
| 46927b831ee6-7d99-411b-b660-d6d93fc5e647 | Not Translated (0%) | Using an AST for payment screening can create some challenges when third parties complete payment messages. | Using an AST for payment screening can create some challenges when third parties complete payment messages. |
| 46937b831ee6-7d99-411b-b660-d6d93fc5e647 | Not Translated (0%) | These include: | These include: |
| 46948cf2297c-bf88-421a-99fd-219dae916bfb | Not Translated (0%) | Entry of information in the incorrect field | Entry of information in the incorrect field |
| 4695ebdb8ae3-aab4-4f87-a76c-3b0c3dec086e | Not Translated (0%) | Entry of incorrect information | Entry of incorrect information |
| 46966cfbc083-ac13-4a5b-a242-3e165fb81b8e | Not Translated (0%) | Use of abbreviations or symbols | Use of abbreviations or symbols |
| 469744893c56-8f96-422a-984c-a9cc43970905 | Not Translated (0%) | Incomplete words | Incomplete words |
| 469811b50f38-f9f1-48ca-944f-4a4635f4cd40 | Not Translated (0%) | To ensure that an AST picks up both blank fields and fields that are filled with “junk” (random symbols or words to populate a field), some ASTs support equivalence and non-equivalence algorithms for fuzzy matching. | To ensure that an AST picks up both blank fields and fields that are filled with “junk” (random symbols or words to populate a field), some ASTs support equivalence and non-equivalence algorithms for fuzzy matching. |
| 46997c8c6ec0-4610-4fe4-ba4b-f0a48e17bb59 | Not Translated (0%) | TOLL GATES | TOLL GATES |
| 4700ad4c2cfb-10f0-4762-8916-a1f49081a8e9 | Not Translated (0%) | The information that forms a part of a payment message can change as it passes through the various parties that form the payment chain; these parties can be described as toll gates (<11315/>). | The information that forms a part of a payment message can change as it passes through the various parties that form the payment chain; these parties can be described as toll gates (<11315/>). |
| 47011f91e8f9-a14f-4dbd-b727-29482b55580c | Not Translated (0%) | Toll Gates Example | Toll Gates Example |
| 4702ff67e32b-28e5-40ba-b78f-5488b50d7aac | Not Translated (0%) | Occasionally, information in payment messages varies or is omitted due to human error, inexperience, or simply variations in a description. | Occasionally, information in payment messages varies or is omitted due to human error, inexperience, or simply variations in a description. |
| 4703ff67e32b-28e5-40ba-b78f-5488b50d7aac | Not Translated (0%) | As the payment moves through the toll gates, the information might be changed, resulting in an incomplete picture of the sanctions risks involved. | As the payment moves through the toll gates, the information might be changed, resulting in an incomplete picture of the sanctions risks involved. |
| 4704864253b8-242c-4592-a133-8db8e0d251a4 | Not Translated (0%) | For this reason, payment screening tends to have looser parameter weights and thresholds when compared with name screening based on various data quality and availability issues. | For this reason, payment screening tends to have looser parameter weights and thresholds when compared with name screening based on various data quality and availability issues. |
| 4705622591f0-3225-4e97-b749-b6c4d8d367c1 | Not Translated (0%) | DATA TRANSFER | DATA TRANSFER |
| 470643fa88ba-80bd-4513-ab89-cb7790d39a9a | Not Translated (0%) | The Bank Secrecy Act (BSA) rule 31 [31 CFR 103.33(g)]—often called the “Travel Rule”—requires all financial institutions to pass on specific information to the next financial institution in the payment chain for certain fund transmittals that involve more than one financial institution. | The Bank Secrecy Act (BSA) rule 31 [31 CFR 103.33(g)]—often called the “Travel Rule”—requires all financial institutions to pass on specific information to the next financial institution in the payment chain for certain fund transmittals that involve more than one financial institution. |
| 470743fa88ba-80bd-4513-ab89-cb7790d39a9a | Not Translated (0%) | This issue—how data travels through an institution—is another risk for banks to monitor. | This issue—how data travels through an institution—is another risk for banks to monitor. |
| 470843fa88ba-80bd-4513-ab89-cb7790d39a9a | Not Translated (0%) | The fundamental risk is the quality of payment information received from other banks. | The fundamental risk is the quality of payment information received from other banks. |
| 4709f204c484-96e1-4ab2-91c7-f4b821dc543d | Not Translated (0%) | One way to monitor the quality of the information is to check the messages at the bank level and determine if any banks have low-quality data compared with their peers. | One way to monitor the quality of the information is to check the messages at the bank level and determine if any banks have low-quality data compared with their peers. |
| 4710f204c484-96e1-4ab2-91c7-f4b821dc543d | Not Translated (0%) | If recurring patterns occur, e.g., names appear to be truncated, then the institution may not be passing all of the data to the next bank. | If recurring patterns occur, e.g., names appear to be truncated, then the institution may not be passing all of the data to the next bank. |
| 4711f204c484-96e1-4ab2-91c7-f4b821dc543d | Not Translated (0%) | This deficiency hampers an AST’s ability to screen names effectively. | This deficiency hampers an AST’s ability to screen names effectively. |
| 4712f204c484-96e1-4ab2-91c7-f4b821dc543d | Not Translated (0%) | The Travel Rule requires the transmitting institution to include the following information in a transmittal order: | The Travel Rule requires the transmitting institution to include the following information in a transmittal order: |
| 4713bde08cfc-7852-4ea1-a370-8bef4486e740 | Not Translated (0%) | Name of the transmitter, and, if the payment is ordered from an account, the account number of the transmitter | Name of the transmitter, and, if the payment is ordered from an account, the account number of the transmitter |
| 4714155a146f-51cc-49fb-a381-a040e435ff5f | Not Translated (0%) | Address of the transmitter | Address of the transmitter |
| 47154dc8ad7a-9214-4983-875a-406e2c1ad373 | Not Translated (0%) | Amount of the transmittal order | Amount of the transmittal order |
| 4716c43674ce-eef8-436b-8ddd-005ef0f3e612 | Not Translated (0%) | Date of the transmittal order | Date of the transmittal order |
| 47171b740ae9-f22a-4c56-86f3-37784e02ed44 | Not Translated (0%) | Identity of the recipient’s financial institution | Identity of the recipient’s financial institution |
| 471828ea6c8a-de4f-4eb3-9f9f-7765111eaf9b | Not Translated (0%) | As many of the following items as are received with the transmittal order: | As many of the following items as are received with the transmittal order: |
| 47194f3e897f-a4dd-4c26-8dc7-26e6e974ce55 | Not Translated (0%) | Name and address of the recipient | Name and address of the recipient |
| 47205a60ea59-a556-4c3e-a673-522428f237cf | Not Translated (0%) | Account number of the recipient | Account number of the recipient |
| 4721029b6368-7243-4980-9dd5-6bcbdebef023 | Not Translated (0%) | Any other specific identifier of the recipient | Any other specific identifier of the recipient |
| 4722265c5439-0e2a-4447-b31e-b4845c4a1b6f | Not Translated (0%) | Either the name and address or the numerical identifier of the transmitter’s financial institution | Either the name and address or the numerical identifier of the transmitter’s financial institution |
| 47231c3d454f-df2b-43a3-9b02-68f2ba989c55 | Not Translated (0%) | Federal Financial Institutions Examination Council, BSA/AML Examination Manual, 2014. | Federal Financial Institutions Examination Council, BSA/AML Examination Manual, 2014. |
| 4724759983a5-009b-4961-8552-45dc41ac19c3 | Not Translated (0%) | Intermediary financial institutions are expected to pass on any of the above information they received to other financial institutions in the message chain. | Intermediary financial institutions are expected to pass on any of the above information they received to other financial institutions in the message chain. |
| 4725759983a5-009b-4961-8552-45dc41ac19c3 | Not Translated (0%) | It is important to note that while the Travel Rule only applies to funds transmittals of $3,000 USD or more, sanctions apply to all transactions regardless of the value. | It is important to note that while the Travel Rule only applies to funds transmittals of $3,000 USD or more, sanctions apply to all transactions regardless of the value. |
| 47261726f73a-7117-49ea-be2f-4b324550da0a | Not Translated (0%) | In addition, FATF Recommendation 16 specifies the need for financial institutions to provide information about the originator of a payment as well as the beneficiary. | In addition, FATF Recommendation 16 specifies the need for financial institutions to provide information about the originator of a payment as well as the beneficiary. |
| 47271726f73a-7117-49ea-be2f-4b324550da0a | Not Translated (0%) | Under this recommendation, banks have a more explicit obligation to monitor the quality of data in the transactions they receive. | Under this recommendation, banks have a more explicit obligation to monitor the quality of data in the transactions they receive. |
| 4728733cf42c-5fe7-4b2e-806d-7de2716891d1 | Not Translated (0%) | Solving Name and Payment Screening Challenges | Solving Name and Payment Screening Challenges |
| 472938341817-f30f-40d9-a6e2-363ea859cca5 | Not Translated (0%) | To help overcome the challenges posed by naming conventions, transliteration, and romanization, screening analysts should receive name matching training on the cultural diversity of global names, especially those more relevant to the firm’s geographical footprint. | To help overcome the challenges posed by naming conventions, transliteration, and romanization, screening analysts should receive name matching training on the cultural diversity of global names, especially those more relevant to the firm’s geographical footprint. |
| 473038341817-f30f-40d9-a6e2-363ea859cca5 | Not Translated (0%) | For example, an analyst working for a Chinese bank will need to understand Chinese naming conventions. | For example, an analyst working for a Chinese bank will need to understand Chinese naming conventions. |
| 473138341817-f30f-40d9-a6e2-363ea859cca5 | Not Translated (0%) | Analysts can also help by providing feedback from their analysis of hits involving convention or transliteration issues. | Analysts can also help by providing feedback from their analysis of hits involving convention or transliteration issues. |
| 473238341817-f30f-40d9-a6e2-363ea859cca5 | Not Translated (0%) | This feedback can then be used to build equivalence and synonyms lists as they recognize potential matches. | This feedback can then be used to build equivalence and synonyms lists as they recognize potential matches. |
| 4733be6e0793-8bca-4c73-bb84-0bd68d69fafa | Not Translated (0%) | Regular testing using “mocked up” examples can help to verify whether the models or scenarios used fail to flag possible sanctions targets based on how a name is presented or transliterated. | Regular testing using “mocked up” examples can help to verify whether the models or scenarios used fail to flag possible sanctions targets based on how a name is presented or transliterated. |
| 4734be6e0793-8bca-4c73-bb84-0bd68d69fafa | Not Translated (0%) | Mocked-up examples use names taken from a sanctions list that are known to produce a hit and modify them using known typologies, such as glued names, reversed letters, dropped letters, and transliteration. | Mocked-up examples use names taken from a sanctions list that are known to produce a hit and modify them using known typologies, such as glued names, reversed letters, dropped letters, and transliteration. |
| 4735be6e0793-8bca-4c73-bb84-0bd68d69fafa | Not Translated (0%) | These mocked-up names are then screened in a firm’s test environment to determine the thresholds at which they produce a hit. | These mocked-up names are then screened in a firm’s test environment to determine the thresholds at which they produce a hit. |
| 4736be6e0793-8bca-4c73-bb84-0bd68d69fafa | Not Translated (0%) | The firm can then determine appropriate thresholds based on its risk appetite. | The firm can then determine appropriate thresholds based on its risk appetite. |
| 4737be6e0793-8bca-4c73-bb84-0bd68d69fafa | Not Translated (0%) | If a name is too “mocked up” (e.g., Osama bin Laden modified to Oscar Bill Ladin), it may not be effective to set a threshold based on that hit. | If a name is too “mocked up” (e.g., Osama bin Laden modified to Oscar Bill Ladin), it may not be effective to set a threshold based on that hit. |
| 4738be6e0793-8bca-4c73-bb84-0bd68d69fafa | Not Translated (0%) | Although ASTs are important, underlying human judgment and experience are still necessary to ensure proper calibration. | Although ASTs are important, underlying human judgment and experience are still necessary to ensure proper calibration. |
| 4739181849b7-4477-4497-be4b-25d5e3fb0ee9 | Not Translated (0%) | Most screening tools support some form of a “nickname” or equivalence (e.g., “Bill” as a common nickname for “William”). | Most screening tools support some form of a “nickname” or equivalence (e.g., “Bill” as a common nickname for “William”). |
| 4740181849b7-4477-4497-be4b-25d5e3fb0ee9 | Not Translated (0%) | Hence, “Bill” and “William” should be considered equivalent in the screening tool. | Hence, “Bill” and “William” should be considered equivalent in the screening tool. |
| 4741181849b7-4477-4497-be4b-25d5e3fb0ee9 | Not Translated (0%) | Similarly, the various methods used to romanize the same symbol need to be considered equivalent (e.g., “Mr. Ng” and “Mr. Wu”). | Similarly, the various methods used to romanize the same symbol need to be considered equivalent (e.g., “Mr. Ng” and “Mr. Wu”). |
| 4742181849b7-4477-4497-be4b-25d5e3fb0ee9 | Not Translated (0%) | An internal list that identifies equivalencies can be a good way to prevent this problem from reoccurring. | An internal list that identifies equivalencies can be a good way to prevent this problem from reoccurring. |
| 47433c9e5edb-96f4-4f98-87a3-4cf5a988c6b0 | Not Translated (0%) | Yet multiple variations of a name can increase the number of hits generated by an AST. | Yet multiple variations of a name can increase the number of hits generated by an AST. |
| 47443c9e5edb-96f4-4f98-87a3-4cf5a988c6b0 | Not Translated (0%) | One way to avoid this problem is to use a culturally diverse name parser to split out each part of the name. | One way to avoid this problem is to use a culturally diverse name parser to split out each part of the name. |
| 47453c9e5edb-96f4-4f98-87a3-4cf5a988c6b0 | Not Translated (0%) | In fact, this function is available with many ASTs. | In fact, this function is available with many ASTs. |
| 47463c9e5edb-96f4-4f98-87a3-4cf5a988c6b0 | Not Translated (0%) | Names that are broken into discrete parts tend to perform better in the matching algorithms and can reduce the amount of noise and the number of false positives. | Names that are broken into discrete parts tend to perform better in the matching algorithms and can reduce the amount of noise and the number of false positives. |
| 47473c9e5edb-96f4-4f98-87a3-4cf5a988c6b0 | Not Translated (0%) | For example, if a payment message included the name William Butler Yeats, instead of the name simply mapping to a “name” field, it could potentially be parsed into first = William, middle = Butler, and last = Yeats. | For example, if a payment message included the name William Butler Yeats, instead of the name simply mapping to a “name” field, it could potentially be parsed into first = William, middle = Butler, and last = Yeats. |
| 47485cb85716-3031-4679-a3b1-9b7f448bb83a | Not Translated (0%) | Another potential data point setting for an AST is the country information from the address field. | Another potential data point setting for an AST is the country information from the address field. |
| 47495cb85716-3031-4679-a3b1-9b7f448bb83a | Not Translated (0%) | Rather than simply looking at the name on its own, the AST would calculate the likelihood of a name match by also screening “country.” | Rather than simply looking at the name on its own, the AST would calculate the likelihood of a name match by also screening “country.” |
| 47505cb85716-3031-4679-a3b1-9b7f448bb83a | Not Translated (0%) | If the AST is screening a payment message, it will screen both of these data points. | If the AST is screening a payment message, it will screen both of these data points. |
| 47519742b903-abc1-4ca0-abb4-745ef91a271c | Not Translated (0%) | Some organizations with a low risk appetite elect to take a conservative approach toward managing payments screening by adopting low screening thresholds and investigating all the numerous hits generated to significantly decrease the risk of violating a sanctions restriction. | Some organizations with a low risk appetite elect to take a conservative approach toward managing payments screening by adopting low screening thresholds and investigating all the numerous hits generated to significantly decrease the risk of violating a sanctions restriction. |
| 47529742b903-abc1-4ca0-abb4-745ef91a271c | Not Translated (0%) | Others adopt higher thresholds based on a higher risk appetite in an attempt to effectively manage the volume of hits generated from payment screening. | Others adopt higher thresholds based on a higher risk appetite in an attempt to effectively manage the volume of hits generated from payment screening. |
| 47539742b903-abc1-4ca0-abb4-745ef91a271c | Not Translated (0%) | The former approach can be very time and cost-intensive compared to the latter approach. | The former approach can be very time and cost-intensive compared to the latter approach. |
| 47549742b903-abc1-4ca0-abb4-745ef91a271c | Not Translated (0%) | However, the latter generally has a higher risk of a sanctions violation, which may result in a fine. | However, the latter generally has a higher risk of a sanctions violation, which may result in a fine. |
| 47559742b903-abc1-4ca0-abb4-745ef91a271c | Not Translated (0%) | So organizations must find the right balance of risk and reward and implement tools and procedures to ensure a process that is both effective and efficient. | So organizations must find the right balance of risk and reward and implement tools and procedures to ensure a process that is both effective and efficient. |
| 475647085f95-fe70-45a4-94ed-d97c3573f43f | Not Translated (0%) | Trade Activity Screening | Trade Activity Screening |
| 4757c93edbb9-dab5-485f-bbdb-14dcff11adf1 | Not Translated (0%) | The screening of trade-related activity warrants additional description, as this risk area is somewhat unique in its regulatory expectations, approach, and challenges. | The screening of trade-related activity warrants additional description, as this risk area is somewhat unique in its regulatory expectations, approach, and challenges. |
| 47588a735bf6-9e40-402e-8fc1-94da86805d0d | Not Translated (0%) | Trade-Related Sanctions Lists | Trade-Related Sanctions Lists |
| 4759686bc6e0-f39e-4af6-abfa-99dbd5b1d7e7 | Not Translated (0%) | As with other business lines, sanctions lists are maintained in relation to trade restrictions. | As with other business lines, sanctions lists are maintained in relation to trade restrictions. |
| 4760686bc6e0-f39e-4af6-abfa-99dbd5b1d7e7 | Not Translated (0%) | The contents of these lists can differ from the lists previously reviewed in this study guide, but they do use some of the same identifiers. | The contents of these lists can differ from the lists previously reviewed in this study guide, but they do use some of the same identifiers. |
| 4761686bc6e0-f39e-4af6-abfa-99dbd5b1d7e7 | Not Translated (0%) | Additional identifier information is added to trade-restriction sanctions lists, such as the goods and services involved and the nature of the penalties imposed on a target for failing to comply with trade restrictions. | Additional identifier information is added to trade-restriction sanctions lists, such as the goods and services involved and the nature of the penalties imposed on a target for failing to comply with trade restrictions. |
| 476249056297-58b9-49d8-bb20-cb106a062eb8 | Not Translated (0%) | In the United States, the BIS maintains the Consolidated Screening List (CSL) of targets on which it has imposed trading restrictions. | In the United States, the BIS maintains the Consolidated Screening List (CSL) of targets on which it has imposed trading restrictions. |
| 476349056297-58b9-49d8-bb20-cb106a062eb8 | Not Translated (0%) | The extent of the restrictions imposed can vary in severity. | The extent of the restrictions imposed can vary in severity. |
| 476449056297-58b9-49d8-bb20-cb106a062eb8 | Not Translated (0%) | For example, for one target it can be an outright prohibition from engaging in certain trade activity, and for another it can be the stipulation to comply with additional licensing requirements in order to trade certain goods. | For example, for one target it can be an outright prohibition from engaging in certain trade activity, and for another it can be the stipulation to comply with additional licensing requirements in order to trade certain goods. |
| 476585bfd433-6877-4f6b-a89d-0e17f5d697d2 | Not Translated (0%) | The US Denied Persons List includes individuals and entities whose export privileges have been denied by the BIS. | The US Denied Persons List includes individuals and entities whose export privileges have been denied by the BIS. |
| 476685bfd433-6877-4f6b-a89d-0e17f5d697d2 | Not Translated (0%) | Identifiers on the Denied Persons List include: | Identifiers on the Denied Persons List include: |
| 4767700b2738-43f8-4b81-9edf-8acc21b5fb01 | Not Translated (0%) | Registered or incorporation name and registration number | Registered or incorporation name and registration number |
| 47682017a7be-cde9-437f-9e5f-78398f6ade38 | Not Translated (0%) | Registered or legal address or any known operating address | Registered or legal address or any known operating address |
| 47692f5849c6-f293-4434-a2cd-cb0d47438321 | Not Translated (0%) | Jurisdiction associated with the entity and/or its activities | Jurisdiction associated with the entity and/or its activities |
| 477025422718-ffb9-4f94-98cb-1970820ec319 | Not Translated (0%) | Types of goods or services involved | Types of goods or services involved |
| 4771160d2a9e-e6a4-4467-99c5-8065e272795a | Not Translated (0%) | Penalties imposed for noncompliance | Penalties imposed for noncompliance |
| 477225655384-fd16-4e7e-ade9-c60d97055f79 | Not Translated (0%) | The Denied Persons List specifies the time period over which restrictions remain in force, along with their expiration date. | The Denied Persons List specifies the time period over which restrictions remain in force, along with their expiration date. |
| 477357b36239-3147-4e83-869a-2109bbff5aed | Not Translated (0%) | In the example shown in <11557/>, the Denied Persons List doesn’t include extensive, detailed information about the goods involved or the conduct of the target. | In the example shown in <11557/>, the Denied Persons List doesn’t include extensive, detailed information about the goods involved or the conduct of the target. |
| 477457b36239-3147-4e83-869a-2109bbff5aed | Not Translated (0%) | But it does include a citation to the Federal Register, which provides the information that the airline broke the law four times by re-exporting a 757 aircraft to Iran without US approval. | But it does include a citation to the Federal Register, which provides the information that the airline broke the law four times by re-exporting a 757 aircraft to Iran without US approval. |
| 477557b36239-3147-4e83-869a-2109bbff5aed | Not Translated (0%) | The summary also identifies the recipient entity—Eram Air—and the trade restrictions that were violated. | The summary also identifies the recipient entity—Eram Air—and the trade restrictions that were violated. |
| 47764fb23226-d3f7-4c79-bc4f-b606e607e681 | Not Translated (0%) | US Denied Persons List: | US Denied Persons List: |
| 47774fb23226-d3f7-4c79-bc4f-b606e607e681 | Not Translated (0%) | Denied Person Entry | Denied Person Entry |
| 4778709dce0e-4216-4a79-8f7d-90dc04c599bc | Not Translated (0%) | Name and Address | Name and Address |
| 47798e325aae-95bd-4b84-b37d-dd2f045e614c | Not Translated (0%) | Effective Date | Effective Date |
| 478081b121a1-7322-4999-a685-7315fa2f6fda | Not Translated (0%) | Expiration Date | Expiration Date |
| 4781d2abe63a-3111-4148-9aaf-3e175fcef4c5 | Not Translated (0%) | AIR BASHKORTOSTAN, LTD. | AIR BASHKORTOSTAN, LTD. |
| 478297ce36eb-3e1f-42fa-abf8-d559f4490d55 | Not Translated (0%) | 142001, MOSCOW REGION, CITY OF | 142001, MOSCOW REGION, CITY OF |
| 47830315a5f9-4490-487a-80df-34a320101496 | Not Translated (0%) | DOMODEDOVO, CENTRALNY DISTRICT, | DOMODEDOVO, CENTRALNY DISTRICT, |
| 4784862b68cb-cc55-49f1-a4c7-a511204f30c1 | Not Translated (0%) | PROMYSHLENNAYA STREET, 11B, RUSSIAN FEDEERATION, DOMODEDOVO, RU, 142001 | PROMYSHLENNAYA STREET, 11B, RUSSIAN FEDEERATION, DOMODEDOVO, RU, 142001 |
| 4785d0a584c3-9e31-4977-bc53-c67298fde422 | Not Translated (0%) | 08/28/2015 | 08/28/2015 |
| 47863c09551b-e8dc-452e-be91-1b2147c6918e | Not Translated (0%) | 08/28/2016 | 08/28/2016 |
| 4787dd5815d7-fccf-4db4-8070-04e2200175ca | Not Translated (0%) | Regulatory Expectations | Regulatory Expectations |
| 4788c220a53d-568b-41fe-8d5e-a10646c7589f | Not Translated (0%) | In most countries, relevant customs agencies manage information on goods imported and exported into the jurisdiction and maintain an intelligence database on the import and export of goods. | In most countries, relevant customs agencies manage information on goods imported and exported into the jurisdiction and maintain an intelligence database on the import and export of goods. |
| 4789c220a53d-568b-41fe-8d5e-a10646c7589f | Not Translated (0%) | In a few jurisdictions, other agencies such as the Economic Services Bureau, Free Zone Authorities, Census and Statistics Department, and Port Terminal Operators also record and manage information on goods imported and exported. | In a few jurisdictions, other agencies such as the Economic Services Bureau, Free Zone Authorities, Census and Statistics Department, and Port Terminal Operators also record and manage information on goods imported and exported. |
| 4790c220a53d-568b-41fe-8d5e-a10646c7589f | Not Translated (0%) | In most of the jurisdictions, the information databases are used to capture all relevant information both on imported and exported goods, including the value of goods and details on the importer, exporter, owner, receiver, and company. | In most of the jurisdictions, the information databases are used to capture all relevant information both on imported and exported goods, including the value of goods and details on the importer, exporter, owner, receiver, and company. |
| 4791c220a53d-568b-41fe-8d5e-a10646c7589f | Not Translated (0%) | Generally, jurisdictions use a customs declaration form, which can also be used to detect or investigate sanctions evasion or trade-based money laundering (TBML) cases. | Generally, jurisdictions use a customs declaration form, which can also be used to detect or investigate sanctions evasion or trade-based money laundering (TBML) cases. |
| 4792c220a53d-568b-41fe-8d5e-a10646c7589f | Not Translated (0%) | According to the Asia/Pacific Group on Money Laundering, “Some jurisdictions have indicated that the relevant regulator or supervisor provides guidance to reporting entities regarding TBML vulnerabilities and red flags. | According to the Asia/Pacific Group on Money Laundering, “Some jurisdictions have indicated that the relevant regulator or supervisor provides guidance to reporting entities regarding TBML vulnerabilities and red flags. |
| 4793c220a53d-568b-41fe-8d5e-a10646c7589f | Not Translated (0%) | Such guidance includes dissemination of examples of suspicious transactions (i.e., red flags in relation to trade finance, typologies reports, and papers issued by either FATF or APG) to enhance awareness. | Such guidance includes dissemination of examples of suspicious transactions (i.e., red flags in relation to trade finance, typologies reports, and papers issued by either FATF or APG) to enhance awareness. |
| 4794c220a53d-568b-41fe-8d5e-a10646c7589f | Not Translated (0%) | Some responses indicate that, although no specific guidance was provided in relation to TBML, more general guidelines about AML/CFT were issued to the banking and financial institutions.” | Some responses indicate that, although no specific guidance was provided in relation to TBML, more general guidelines about AML/CFT were issued to the banking and financial institutions.” |
| 479576bbec13-627a-4d5c-8fd9-5792e0f863f9 | Not Translated (0%) | Asia/Pacific Group on Money Laundering, APG Typology Report on Trade Based Money Laundering, July 20, 2012. | Asia/Pacific Group on Money Laundering, APG Typology Report on Trade Based Money Laundering, July 20, 2012. |
| 47968b577761-1a4a-43b1-939a-d5470af79f07 | Not Translated (0%) | In the United States, BIS oversees the enforcement of trade restrictions. | In the United States, BIS oversees the enforcement of trade restrictions. |
| 47978b577761-1a4a-43b1-939a-d5470af79f07 | Not Translated (0%) | Enforcement of European trade restrictions is undertaken by the Member States, each of which has identified a regulatory body for this purpose. | Enforcement of European trade restrictions is undertaken by the Member States, each of which has identified a regulatory body for this purpose. |
| 47988b577761-1a4a-43b1-939a-d5470af79f07 | Not Translated (0%) | Regulatory expectations are established with regard to screening parameters (i.e., who should be screened and when) and dual-use goods. | Regulatory expectations are established with regard to screening parameters (i.e., who should be screened and when) and dual-use goods. |
| 479960d020d7-c92c-4315-ba65-c21fd7f64f74 | Not Translated (0%) | Australian Transaction Reports and Analysis Centre (AUSTRAC) provides financial intelligence support to the Australian Federal Police, Australian Border Force, Australian Criminal Intelligence Commission, Australian Taxation Office, and other partner agencies. | Australian Transaction Reports and Analysis Centre (AUSTRAC) provides financial intelligence support to the Australian Federal Police, Australian Border Force, Australian Criminal Intelligence Commission, Australian Taxation Office, and other partner agencies. |
| 480060d020d7-c92c-4315-ba65-c21fd7f64f74 | Not Translated (0%) | AUSTRAC works within the Australian Criminal Intelligence Commission’s Eligo Task Force, which focuses on Australian and international networks involved in money laundering through various means, including trade-based money laundering. | AUSTRAC works within the Australian Criminal Intelligence Commission’s Eligo Task Force, which focuses on Australian and international networks involved in money laundering through various means, including trade-based money laundering. |
| 480160d020d7-c92c-4315-ba65-c21fd7f64f74 | Not Translated (0%) | The Monetary Authority of Singapore (MAS) recognized that the increasing complexity of trade and finance meant there was a need for more targeted supervision and enforcement work. | The Monetary Authority of Singapore (MAS) recognized that the increasing complexity of trade and finance meant there was a need for more targeted supervision and enforcement work. |
| 4802e195912b-9913-4ade-9bdd-32112a0695d7 | Not Translated (0%) | “AML/CTF Outlook: | “AML/CTF Outlook: |
| 4803e195912b-9913-4ade-9bdd-32112a0695d7 | Not Translated (0%) | Asia-Pacific Regulators to Target Trade-Based Laundering in 2017,” Hong Kong Lawyer, January 13, 2017. | Asia-Pacific Regulators to Target Trade-Based Laundering in 2017,” Hong Kong Lawyer, January 13, 2017. |
| 4804ebd80a77-3b9b-4d9d-a882-072d0c9e129a | Not Translated (0%) | SCREENING PARAMETERS | SCREENING PARAMETERS |
| 4805766399f4-8d7b-4ab3-bc4b-404f389f3bdb | Not Translated (0%) | Regulators require sanctions screening in trade finance to be comprehensive and performed on all of the parties involved in a trade transaction. | Regulators require sanctions screening in trade finance to be comprehensive and performed on all of the parties involved in a trade transaction. |
| 4806766399f4-8d7b-4ab3-bc4b-404f389f3bdb | Not Translated (0%) | Importantly, screening should not be limited to individuals or legal entities. | Importantly, screening should not be limited to individuals or legal entities. |
| 4807766399f4-8d7b-4ab3-bc4b-404f389f3bdb | Not Translated (0%) | It should also include the: | It should also include the: |
| 480807c052d7-52a1-4776-b7a6-56f75dc22281 | Not Translated (0%) | Vessel used to transport goods (e.g., name, owners, consigner, consignee) | Vessel used to transport goods (e.g., name, owners, consigner, consignee) |
| 48096c0ab4cc-4b30-4017-98bf-18f8e94c097a | Not Translated (0%) | Shipping company | Shipping company |
| 4810adc4084b-4264-45b8-bb01-1537f3c6a2e5 | Not Translated (0%) | Shipping routes | Shipping routes |
| 48116068f231-d131-4658-aea3-c13ad38e0469 | Not Translated (0%) | Agents or third parties present in the transaction | Agents or third parties present in the transaction |
| 4812d4f77f1c-3477-4ebb-bdb9-72ae32e55aac | Not Translated (0%) | Ports of call (origin port, transshipment location(s), and destination port) | Ports of call (origin port, transshipment location(s), and destination port) |
| 4813c69e48cd-2ef5-45a3-97f8-795241f3d4d2 | Not Translated (0%) | Recent voyage history of the vessel | Recent voyage history of the vessel |
| 4814e01d70b8-c622-45c5-b912-39fb39d6bf7b | Not Translated (0%) | Part of the screening process involves reviewing records that might contain relevant information, such as SWIFT messages, letters of credit, bills of exchange, bills of lading, commercial invoices, insurance certificates, ship manifests, and certificates of origin. | Part of the screening process involves reviewing records that might contain relevant information, such as SWIFT messages, letters of credit, bills of exchange, bills of lading, commercial invoices, insurance certificates, ship manifests, and certificates of origin. |
| 4815e01d70b8-c622-45c5-b912-39fb39d6bf7b | Not Translated (0%) | Additional records might also be sought to check the provenance of the goods and whether there is evidence that other records might have been falsified or altered. | Additional records might also be sought to check the provenance of the goods and whether there is evidence that other records might have been falsified or altered. |
| 48169fd34021-d07d-4e22-8c87-29c769e70479 | Not Translated (0%) | MT700 messages, which are often used for letters of credit and trade-finance transactions, carry an elevated sanctions risk. | MT700 messages, which are often used for letters of credit and trade-finance transactions, carry an elevated sanctions risk. |
| 48179fd34021-d07d-4e22-8c87-29c769e70479 | Not Translated (0%) | These messages tend to include a significant amount of unstructured data, including descriptions of the trade finance deals. | These messages tend to include a significant amount of unstructured data, including descriptions of the trade finance deals. |
| 48189fd34021-d07d-4e22-8c87-29c769e70479 | Not Translated (0%) | Because the data is unstructured, meaning the data is not in a predefined format, MT700 messages can generate many false positive hits. | Because the data is unstructured, meaning the data is not in a predefined format, MT700 messages can generate many false positive hits. |
| 48199fd34021-d07d-4e22-8c87-29c769e70479 | Not Translated (0%) | For example, the “said party” or “for said amount” may generate numerous matches against OFAC SDNs. | For example, the “said party” or “for said amount” may generate numerous matches against OFAC SDNs. |
| 48201462f14d-2dfe-41e0-a41c-d2a02991d1d3 | Not Translated (0%) | In its 2013 report, the FCA found that sanctions controls could be better applied to trade transactions, and recommended that: | In its 2013 report, the FCA found that sanctions controls could be better applied to trade transactions, and recommended that: |
| 48214b0eeaef-0f54-4fe3-9d2d-061d6a248de3 | Not Translated (0%) | All fields in SWIFT 700 messages should be screened. | All fields in SWIFT 700 messages should be screened. |
| 4822e4c485ca-b553-4138-95b5-6ba5a3f8c358 | Not Translated (0%) | All incoming and outgoing payments should be screened. | All incoming and outgoing payments should be screened. |
| 48235d3a3356-aaa0-41ac-9e0f-6d1ca6a5b6bf | Not Translated (0%) | Financial institutions should have procedures that capture new or amended information received through the life of a transaction and ensure that any changes to payment messages are screened. | Financial institutions should have procedures that capture new or amended information received through the life of a transaction and ensure that any changes to payment messages are screened. |
| 4824c4c77e5c-014d-4373-8ce5-2a3c8daf3275 | Not Translated (0%) | Screening should be performed at the inception of a trade finance transaction and again when trade documentation is submitted because some details may have changed. | Screening should be performed at the inception of a trade finance transaction and again when trade documentation is submitted because some details may have changed. |
| 4825c4c77e5c-014d-4373-8ce5-2a3c8daf3275 | Not Translated (0%) | For example, the vessel used or the ports of call may not have been known at inception and therefore not screened. | For example, the vessel used or the ports of call may not have been known at inception and therefore not screened. |
| 48263216c7ac-33ab-4939-ac56-0928914e5e49 | Not Translated (0%) | Although ASTs are useful to identify possible financial sanctions risks, given the contextual nature of trade sanctions their usefulness may be limited when assessing whether trade sanctions or arms embargoes apply to a specific transaction. | Although ASTs are useful to identify possible financial sanctions risks, given the contextual nature of trade sanctions their usefulness may be limited when assessing whether trade sanctions or arms embargoes apply to a specific transaction. |
| 48273216c7ac-33ab-4939-ac56-0928914e5e49 | Not Translated (0%) | For example, if a firm wanted to specifically monitor for uranium shipments to France because Australia had imposed a trade sanction, solely relying on an AST would likely either create too many hits (e.g., all payments from France) or may not be able to screen the underlying trade documents. | For example, if a firm wanted to specifically monitor for uranium shipments to France because Australia had imposed a trade sanction, solely relying on an AST would likely either create too many hits (e.g., all payments from France) or may not be able to screen the underlying trade documents. |
| 48283216c7ac-33ab-4939-ac56-0928914e5e49 | Not Translated (0%) | Therefore, for screening of trade-related activities, ASTs should be used in conjunction with manual screening and additional due diligence on a risk-sensitive basis. | Therefore, for screening of trade-related activities, ASTs should be used in conjunction with manual screening and additional due diligence on a risk-sensitive basis. |
| 4829ad14abc8-18ad-4289-9e0a-b1cbc29683e0 | Not Translated (0%) | DUAL-USE GOODS | DUAL-USE GOODS |
| 4830826b1eb5-9421-4371-a32b-17bf4b0f9c9f | Not Translated (0%) | Dual-use goods are products, materials, and technologies that can be used for both civilian and military purposes, such as computers, lasers, magnets, and SCUBA gear. | Dual-use goods are products, materials, and technologies that can be used for both civilian and military purposes, such as computers, lasers, magnets, and SCUBA gear. |
| 4831826b1eb5-9421-4371-a32b-17bf4b0f9c9f | Not Translated (0%) | Dual-use goods are not listed on the same lists as sanctions targets, such as the SDN list in the United States. | Dual-use goods are not listed on the same lists as sanctions targets, such as the SDN list in the United States. |
| 4832826b1eb5-9421-4371-a32b-17bf4b0f9c9f | Not Translated (0%) | Rather, a list of these goods and the restrictions on their export, use, and license requirements are described in separate regulations. | Rather, a list of these goods and the restrictions on their export, use, and license requirements are described in separate regulations. |
| 4833826b1eb5-9421-4371-a32b-17bf4b0f9c9f | Not Translated (0%) | The restrictions imposed on dual-use goods are also referred to as embargoes or trade restrictions. | The restrictions imposed on dual-use goods are also referred to as embargoes or trade restrictions. |
| 4834826b1eb5-9421-4371-a32b-17bf4b0f9c9f | Not Translated (0%) | In Europe, the EU maintains a list of dual-use goods and their related restrictions. | In Europe, the EU maintains a list of dual-use goods and their related restrictions. |
| 48353f7dd6bc-c6be-4507-a260-aad71b6288c7 | Not Translated (0%) | The Wassenaar Arrangement (WA) has been established to contribute to regional and international security. | The Wassenaar Arrangement (WA) has been established to contribute to regional and international security. |
| 48363f7dd6bc-c6be-4507-a260-aad71b6288c7 | Not Translated (0%) | Its aims are as follows: | Its aims are as follows: |
| 4837a2f8ae2e-adf6-4c5b-b61b-7e05c83d411f | Not Translated (0%) | Promote transparency and increased responsibility in transfers of conventional arms and dual-use goods and technologies | Promote transparency and increased responsibility in transfers of conventional arms and dual-use goods and technologies |
| 4838927b8523-04fb-42fd-869e-7bf0812b4f4a | Not Translated (0%) | Prevent destabilizing accumulations | Prevent destabilizing accumulations |
| 48392b70823c-179b-4f12-8401-11a0092407f9 | Not Translated (0%) | Prevent the acquisitions of arms and dual-use goods and technologies by terrorists | Prevent the acquisitions of arms and dual-use goods and technologies by terrorists |
| 48405b83cc0a-83ef-40fe-8721-9a5131ca4ec2 | Not Translated (0%) | Participating states aim to make national policies that ensure transfers of such items do not promote development or enhancement of military capabilities that would run counter to the agreement’s goals. | Participating states aim to make national policies that ensure transfers of such items do not promote development or enhancement of military capabilities that would run counter to the agreement’s goals. |
| 48415b83cc0a-83ef-40fe-8721-9a5131ca4ec2 | Not Translated (0%) | As part of this effort, the participants apply export controls on all items set forth in the List of Dual-Use Goods and Technologies and the Munitions List, aiming to prevent unauthorized transfers or re-transfers of these items. | As part of this effort, the participants apply export controls on all items set forth in the List of Dual-Use Goods and Technologies and the Munitions List, aiming to prevent unauthorized transfers or re-transfers of these items. |
| 4842e2edf3a6-0205-4a28-9dba-0aa879c60e23 | Not Translated (0%) | The Wassenaar Arrangement, “About Us.” | The Wassenaar Arrangement, “About Us.” |
| 4843c993089d-ecb8-4b78-ba10-e0c7fd8ea76f | Not Translated (0%) | Regulators have identified what they consider to be acceptable and unacceptable practices in terms of dual-use goods, as outlined in <11719/>. | Regulators have identified what they consider to be acceptable and unacceptable practices in terms of dual-use goods, as outlined in <11719/>. |
| 48445a9209d2-39bf-41eb-9943-97b05fc25cdd | Not Translated (0%) | Screening Practices for Dual-Use Goods | Screening Practices for Dual-Use Goods |
| 4845f823658f-d913-490d-ab0b-1aa163da105a | Not Translated (0%) | Examples of Acceptable Practices | Examples of Acceptable Practices |
| 484625509c6f-4cf6-4067-a672-f9042a285f3a | Not Translated (0%) | Examples of Unacceptable Practices | Examples of Unacceptable Practices |
| 4847a8780377-a184-48d0-820c-1830305b22be | Not Translated (0%) | Attempting to identify dual-use goods in transactions wherever possible | Attempting to identify dual-use goods in transactions wherever possible |
| 4848f10854de-bd05-429d-972f-89ebdf573055 | Not Translated (0%) | Ensuring staff members are aware of dual-use goods issues, as well as common types of goods that have dual uses | Ensuring staff members are aware of dual-use goods issues, as well as common types of goods that have dual uses |
| 484937038fb0-7f06-484f-867a-5f1d77f64de1 | Not Translated (0%) | Confirming with the exporter in high-risk situations whether a government license is required for the transaction and requesting a copy of the license when required | Confirming with the exporter in high-risk situations whether a government license is required for the transaction and requesting a copy of the license when required |
| 4850cca8c6f8-893c-4fc1-92d3-c1c9a7bb403d | Not Translated (0%) | Failing to attempt to identify dual-use goods in transactions | Failing to attempt to identify dual-use goods in transactions |
| 48514f54922b-bf5a-4aee-85e5-b00e7bb6e292 | Not Translated (0%) | Focusing solely on military or “lethal end-use” goods | Focusing solely on military or “lethal end-use” goods |
| 48523658de2d-8ab8-4769-85cd-36614a1d2b73 | Not Translated (0%) | Failing to establish a clear dual-use goods policy | Failing to establish a clear dual-use goods policy |
| 4853494bbb4d-be80-41e4-abbc-d9c06fdce8ec | Not Translated (0%) | Failing to undertake further research when goods descriptions are vague or confusing | Failing to undertake further research when goods descriptions are vague or confusing |
| 4854dc5bad79-550e-4ebd-a38b-c812acad42f7 | Not Translated (0%) | Failing to make use of third-party data sources when possible to undertake checks on dual-use goods | Failing to make use of third-party data sources when possible to undertake checks on dual-use goods |
| 4855b02f9ade-ad3c-477c-96db-defffa3d7a22 | Not Translated (0%) | The inherent sanctions risks related to dual-use goods are often identified through the conduct undertaken by the parties involved and/or the records provided by them to the front-line business staff. | The inherent sanctions risks related to dual-use goods are often identified through the conduct undertaken by the parties involved and/or the records provided by them to the front-line business staff. |
| 4856b02f9ade-ad3c-477c-96db-defffa3d7a22 | Not Translated (0%) | The following is a list of red flags concerning dual-use goods: | The following is a list of red flags concerning dual-use goods: |
| 4857b1bd5345-eff7-497f-a905-91966930495c | Not Translated (0%) | The customer details are similar to those found on the US BIS List of Denied Persons. | The customer details are similar to those found on the US BIS List of Denied Persons. |
| 485892e4cb7d-0caa-43fd-bdeb-cd7935a630e8 | Not Translated (0%) | The customer is reluctant to provide information about the end use of the goods. | The customer is reluctant to provide information about the end use of the goods. |
| 4859af59e643-40f8-4550-855f-02e10da57c70 | Not Translated (0%) | The customer has little or no export or trade business background. | The customer has little or no export or trade business background. |
| 48603c2fc8fe-a26d-412b-8faa-722b0f63e1ae | Not Translated (0%) | The customer is evasive or unclear about the intended use of the goods or whether they will be re-exported by the buyer. | The customer is evasive or unclear about the intended use of the goods or whether they will be re-exported by the buyer. |
| 486109552870-a84b-40af-afc1-8722638a16de | Not Translated (0%) | The shipping route is abnormal for the product and destination. | The shipping route is abnormal for the product and destination. |
| 48622269bed9-094e-46de-bcd6-2c1fbbf3aadc | Not Translated (0%) | Packing is inconsistent with the stated method of shipment or destination. | Packing is inconsistent with the stated method of shipment or destination. |
| 48636c44b0f8-7ae6-455b-83c2-63af7b74478a | Not Translated (0%) | Delivery dates are vague, or deliveries are planned for unusual destinations. | Delivery dates are vague, or deliveries are planned for unusual destinations. |
| 48647b123dd6-14d7-4de7-8093-e8cffdd1afc9 | Not Translated (0%) | The product’s final destination is a freight-forwarding firm. | The product’s final destination is a freight-forwarding firm. |
| 486573aff715-0b53-429b-892d-1c3083367a89 | Not Translated (0%) | Approach | Approach |
| 4866498afa80-1f4f-4d69-813b-e418a81fc816 | Not Translated (0%) | Trade-activity screening differs in a number of ways from simply screening an individual’s name against a list of sanctions targets. | Trade-activity screening differs in a number of ways from simply screening an individual’s name against a list of sanctions targets. |
| 4867498afa80-1f4f-4d69-813b-e418a81fc816 | Not Translated (0%) | It also differs from payment screening. | It also differs from payment screening. |
| 4868498afa80-1f4f-4d69-813b-e418a81fc816 | Not Translated (0%) | Trade-activity screening can involve complex transactions and a voluminous amount of message data related to just one deal. | Trade-activity screening can involve complex transactions and a voluminous amount of message data related to just one deal. |
| 4869498afa80-1f4f-4d69-813b-e418a81fc816 | Not Translated (0%) | In addition, trade payment messages often include more free text, which increases the risk that text can be misunderstood. | In addition, trade payment messages often include more free text, which increases the risk that text can be misunderstood. |
| 48702f6ff559-0ae1-4856-827d-f277744172cc | Not Translated (0%) | In general, the results of trade-activity screening are not necessarily straightforward. | In general, the results of trade-activity screening are not necessarily straightforward. |
| 48712f6ff559-0ae1-4856-827d-f277744172cc | Not Translated (0%) | For example: | For example: |
| 4872c946ac1b-e76c-4af0-8955-7801366c25c7 | Not Translated (0%) | Restrictions may relate to specific goods for a specific time period. | Restrictions may relate to specific goods for a specific time period. |
| 487362d1f52c-4036-4b41-ac4e-23c5d5e4c831 | Not Translated (0%) | Goods may be restricted based on quantity and composition. | Goods may be restricted based on quantity and composition. |
| 48746e79757c-615c-4c54-9d5e-80c43000d744 | Not Translated (0%) | Targets may be restricted from certain financial activities in specific sectors. | Targets may be restricted from certain financial activities in specific sectors. |
| 487577247a15-9445-4347-9949-ce4588809ed2 | Not Translated (0%) | Therefore, an organization might need to determine whether the entity is subject to conditional sanctions or trade restrictions on dual-use goods, as well as the composition of the goods and whether they exceed a threshold to the point at which the trade activity is prohibited. | Therefore, an organization might need to determine whether the entity is subject to conditional sanctions or trade restrictions on dual-use goods, as well as the composition of the goods and whether they exceed a threshold to the point at which the trade activity is prohibited. |
| 487677247a15-9445-4347-9949-ce4588809ed2 | Not Translated (0%) | Consider a transaction involving a Russian bank that is subject to sectoral sanctions in which the issuing of new debt is prohibited, but a foreign exchange transaction is allowed. | Consider a transaction involving a Russian bank that is subject to sectoral sanctions in which the issuing of new debt is prohibited, but a foreign exchange transaction is allowed. |
| 4877e8902b12-5c04-485a-ab8c-30f0de2ea37f | Not Translated (0%) | Trade-activity screening creates programming challenges for AST use, as programming all of the conditional scenarios into the AST can prove challenging; therefore, manual review is also essential. | Trade-activity screening creates programming challenges for AST use, as programming all of the conditional scenarios into the AST can prove challenging; therefore, manual review is also essential. |
| 487874ba4782-b9ae-46eb-b8d5-672fb0073f1b | Not Translated (0%) | There are other factors unique to trade-activity screening. | There are other factors unique to trade-activity screening. |
| 487974ba4782-b9ae-46eb-b8d5-672fb0073f1b | Not Translated (0%) | Amendments to initial documentation are common, and there are a high number of false positive hits. | Amendments to initial documentation are common, and there are a high number of false positive hits. |
| 488074ba4782-b9ae-46eb-b8d5-672fb0073f1b | Not Translated (0%) | For example, the text “CUBA” could be related to an address, part of a person’s name, or goods, but not to the actual sanctioned country. | For example, the text “CUBA” could be related to an address, part of a person’s name, or goods, but not to the actual sanctioned country. |
| 48819b88d949-2ccc-46c4-8d7d-1bcb5f3d31b2 | Not Translated (0%) | With trade-related activities, there’s a greater risk of a possible US connection (e.g., involving US currency, persons, or jurisdiction). | With trade-related activities, there’s a greater risk of a possible US connection (e.g., involving US currency, persons, or jurisdiction). |
| 48829b88d949-2ccc-46c4-8d7d-1bcb5f3d31b2 | Not Translated (0%) | This possible connection, or “US Nexus,” makes trade-related activities more likely to be subject in some form or another to US sanctions regulations. | This possible connection, or “US Nexus,” makes trade-related activities more likely to be subject in some form or another to US sanctions regulations. |
| 48839b88d949-2ccc-46c4-8d7d-1bcb5f3d31b2 | Not Translated (0%) | Because a significant amount of trade activity is undertaken using US dollars, US sanctions and embargo restrictions can apply. | Because a significant amount of trade activity is undertaken using US dollars, US sanctions and embargo restrictions can apply. |
| 48849b88d949-2ccc-46c4-8d7d-1bcb5f3d31b2 | Not Translated (0%) | In addition, most trade-related controls and restrictions are not screened by an AST, as trade-related activities remain heavily paper-intensive. | In addition, most trade-related controls and restrictions are not screened by an AST, as trade-related activities remain heavily paper-intensive. |
| 4885c03bd8b9-f9f4-40a5-9eec-c85f959f4083 | Not Translated (0%) | Another challenge is the fact that licensing requirements can differ from country to country. | Another challenge is the fact that licensing requirements can differ from country to country. |
| 4886c03bd8b9-f9f4-40a5-9eec-c85f959f4083 | Not Translated (0%) | Careful attention must be paid to the parameters of these restrictions and the scope of the license issued. | Careful attention must be paid to the parameters of these restrictions and the scope of the license issued. |
| 488787ae85ea-1aa4-48d0-ad3e-d2c2a551f97c | Not Translated (0%) | Evasion is always a risk with trade activity, so it may be necessary to know the transport route from exporter to importer. | Evasion is always a risk with trade activity, so it may be necessary to know the transport route from exporter to importer. |
| 488895f82bed-841c-45f5-af52-ce39aa417a10 | Not Translated (0%) | An organization may need to know how goods will be transported and whether it’s possible that the goods will be diverted while in transit to benefit, or be transported to, a sanctioned target or jurisdiction. | An organization may need to know how goods will be transported and whether it’s possible that the goods will be diverted while in transit to benefit, or be transported to, a sanctioned target or jurisdiction. |
| 4889c96db2b7-2649-4c31-bc2a-079e902b44c2 | Not Translated (0%) | One way in which vessels avoid detection is by turning off their tracking systems, such as the Automatic Identification System (AIS). | One way in which vessels avoid detection is by turning off their tracking systems, such as the Automatic Identification System (AIS). |
| 4890daa281f7-b65b-4d9f-a4d5-d365f49f29c9 | Not Translated (0%) | Complicating matters, sanctions are continually changing. | Complicating matters, sanctions are continually changing. |
| 4891daa281f7-b65b-4d9f-a4d5-d365f49f29c9 | Not Translated (0%) | For example, on October 12, 2017, OFAC revoked longstanding sanctions against Sudan. | For example, on October 12, 2017, OFAC revoked longstanding sanctions against Sudan. |
| 4892daa281f7-b65b-4d9f-a4d5-d365f49f29c9 | Not Translated (0%) | However, some trade restrictions remain in place for the export and re-export of certain goods, and a specific license must be obtained to conduct this trade activity. | However, some trade restrictions remain in place for the export and re-export of certain goods, and a specific license must be obtained to conduct this trade activity. |
| 4893daa281f7-b65b-4d9f-a4d5-d365f49f29c9 | Not Translated (0%) | To ensure that these restrictions are not overlooked, it is important to continually check the relevant sources listing restricted goods. | To ensure that these restrictions are not overlooked, it is important to continually check the relevant sources listing restricted goods. |
| 4894daa281f7-b65b-4d9f-a4d5-d365f49f29c9 | Not Translated (0%) | In this case, for the United States and Sudan, the US Commerce Control List (CCL) should be consulted. | In this case, for the United States and Sudan, the US Commerce Control List (CCL) should be consulted. |
| 4895f348c09c-3b47-4574-aa7e-b5af6dd82b76 | Not Translated (0%) | Challenges | Challenges |
| 48962bcfda1c-e708-4753-840c-6cd228ba2263 | Not Translated (0%) | One of the challenges of trade-related screening is that, given the global nature of trade activity, trade documentation can be described in different ways and using different languages. | One of the challenges of trade-related screening is that, given the global nature of trade activity, trade documentation can be described in different ways and using different languages. |
| 48972bcfda1c-e708-4753-840c-6cd228ba2263 | Not Translated (0%) | The spelling and description of goods and services can differ depending on the language used in the trade documentation. | The spelling and description of goods and services can differ depending on the language used in the trade documentation. |
| 48982bcfda1c-e708-4753-840c-6cd228ba2263 | Not Translated (0%) | For example, Hafnium is a metal that is used for nuclear reactor rods but can also have other commercial applications. | For example, Hafnium is a metal that is used for nuclear reactor rods but can also have other commercial applications. |
| 48992bcfda1c-e708-4753-840c-6cd228ba2263 | Not Translated (0%) | It is classified as a dual-use good that is subject to trade restrictions. | It is classified as a dual-use good that is subject to trade restrictions. |
| 49002bcfda1c-e708-4753-840c-6cd228ba2263 | Not Translated (0%) | The word “Hafnium,” however, can appear in different ways in trade documents, depending upon the language used. | The word “Hafnium,” however, can appear in different ways in trade documents, depending upon the language used. |
| 49012bcfda1c-e708-4753-840c-6cd228ba2263 | Not Translated (0%) | “Hafnium” is “Hafnio” in Spanish, “Háfnio” in Portuguese, and “alhafniuwm eunsur flzy” in Arabic. | “Hafnium” is “Hafnio” in Spanish, “Háfnio” in Portuguese, and “alhafniuwm eunsur flzy” in Arabic. |
| 49021f02da3d-581a-4bb0-ad39-cde7e999929a | Not Translated (0%) | Another challenge with trade restrictions is the fact that certain goods are restricted under specific circumstances based on quantity, weight, and form. | Another challenge with trade restrictions is the fact that certain goods are restricted under specific circumstances based on quantity, weight, and form. |
| 49031f02da3d-581a-4bb0-ad39-cde7e999929a | Not Translated (0%) | An AST, as of yet, cannot screen for this complex information, so a manual review of the relevant records is needed. | An AST, as of yet, cannot screen for this complex information, so a manual review of the relevant records is needed. |
| 49041f02da3d-581a-4bb0-ad39-cde7e999929a | Not Translated (0%) | This review may include checking whether the good’s weight is within the acceptable range permitted under the dual-use goods regulations and whether the necessary license for shipping this quantity has been obtained. | This review may include checking whether the good’s weight is within the acceptable range permitted under the dual-use goods regulations and whether the necessary license for shipping this quantity has been obtained. |
| 4905933c264c-b3d6-489c-bb18-390039d338da | Not Translated (0%) | For example, the amount of permitted Hafnium depends upon its form and the amount used in a product based on its weight. | For example, the amount of permitted Hafnium depends upon its form and the amount used in a product based on its weight. |
| 4906933c264c-b3d6-489c-bb18-390039d338da | Not Translated (0%) | The complex restriction reads, “1C231 Hafnium metal, hafnium alloys, and compounds containing more than 60% hafnium by weight, manufactures thereof, and waste or scrap of any of the foregoing.” | The complex restriction reads, “1C231 Hafnium metal, hafnium alloys, and compounds containing more than 60% hafnium by weight, manufactures thereof, and waste or scrap of any of the foregoing.” |
| 4907e4d4b676-2068-4866-b3d3-7964e3256d41 | Not Translated (0%) | Another major operational challenge when screening trade finance transactions is that some of the documents are presented in a non-digital format, for example, via scanned images sent via email or fax. | Another major operational challenge when screening trade finance transactions is that some of the documents are presented in a non-digital format, for example, via scanned images sent via email or fax. |
| 4908e4d4b676-2068-4866-b3d3-7964e3256d41 | Not Translated (0%) | This means that portions of the transaction that are not communicated via SWIFT need to be manually reviewed. | This means that portions of the transaction that are not communicated via SWIFT need to be manually reviewed. |
| 4909e4d4b676-2068-4866-b3d3-7964e3256d41 | Not Translated (0%) | This challenge can lead to key items being missed because analysts do not know all of the risk indicators. | This challenge can lead to key items being missed because analysts do not know all of the risk indicators. |
| 4910556b68ce-95a3-4eaf-b1d9-dfbfa35002f8 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 4911556b68ce-95a3-4eaf-b1d9-dfbfa35002f8 | Not Translated (0%) | COBHAM HOLDINGS, INC., 2018 | COBHAM HOLDINGS, INC., 2018 |
| 491252f5e034-4d24-45c4-a446-52e2a4144b26 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 4913f8493f87-2583-4736-8b13-da3a364991fb | Not Translated (0%) | In November 2018, the US company Cobham Holdings, Inc. (Cobham) paid fines of $87,507 after entering into a settlement with OFAC on behalf of its subsidiary Aeroflex/Metelics, Inc. (Metelics). | In November 2018, the US company Cobham Holdings, Inc. (Cobham) paid fines of $87,507 after entering into a settlement with OFAC on behalf of its subsidiary Aeroflex/Metelics, Inc. (Metelics). |
| 4914f8493f87-2583-4736-8b13-da3a364991fb | Not Translated (0%) | On June 18, 2014, Metelics agreed to ship an order through a Canadian distributor to the end user, Almaz Antey Telecommunications (AAT). | On June 18, 2014, Metelics agreed to ship an order through a Canadian distributor to the end user, Almaz Antey Telecommunications (AAT). |
| 4915f8493f87-2583-4736-8b13-da3a364991fb | Not Translated (0%) | Because Metelics did not have sufficient stock, the shipments were to take place on June 18, 2014; July 31, 2014; December 19, 2014; and January 15, 2015. | Because Metelics did not have sufficient stock, the shipments were to take place on June 18, 2014; July 31, 2014; December 19, 2014; and January 15, 2015. |
| 4916fced4f72-fc51-406c-957b-39b7a1c03a08 | Not Translated (0%) | On June 19, 2014, Metelics conducted a denied party screening. | On June 19, 2014, Metelics conducted a denied party screening. |
| 4917fced4f72-fc51-406c-957b-39b7a1c03a08 | Not Translated (0%) | Although the screening did return warnings for Russia generally, it did not return results for AAT, and, after the end-user certificate was confirmed to be in compliance by the director of global trade compliance, the shipment was made on June 27, 2014, after an additional screening. | Although the screening did return warnings for Russia generally, it did not return results for AAT, and, after the end-user certificate was confirmed to be in compliance by the director of global trade compliance, the shipment was made on June 27, 2014, after an additional screening. |
| 4918fced4f72-fc51-406c-957b-39b7a1c03a08 | Not Translated (0%) | On July 16, 2014, OFAC updated its SDN list and designated Joint-Stock Company Concern Almaz-Antey (JSC Almaz-Antey). | On July 16, 2014, OFAC updated its SDN list and designated Joint-Stock Company Concern Almaz-Antey (JSC Almaz-Antey). |
| 4919fced4f72-fc51-406c-957b-39b7a1c03a08 | Not Translated (0%) | JSC Almaz-Antey owned 51% of AAT. | JSC Almaz-Antey owned 51% of AAT. |
| 492003ec672f-68d6-4ae1-b305-6c871de7b84e | Not Translated (0%) | On July 31, 2014, Metelics began preparing the second shipment. | On July 31, 2014, Metelics began preparing the second shipment. |
| 492103ec672f-68d6-4ae1-b305-6c871de7b84e | Not Translated (0%) | It again conducted screening that did not produce a match against the added JSC Almaz-Antey; rather, the AST found JSC Almaz-Antey ≠ Almaz Antey Telecommunications LLC. | It again conducted screening that did not produce a match against the added JSC Almaz-Antey; rather, the AST found JSC Almaz-Antey ≠ Almaz Antey Telecommunications LLC. |
| 492203ec672f-68d6-4ae1-b305-6c871de7b84e | Not Translated (0%) | Metelics made additional shipments up to January 15, 2015. | Metelics made additional shipments up to January 15, 2015. |
| 492303ec672f-68d6-4ae1-b305-6c871de7b84e | Not Translated (0%) | Cobham determined that the flaw in its ATS was caused by the software reliance on an all words match, despite search criteria set to “fuzzy” so as to detect partial matches. | Cobham determined that the flaw in its ATS was caused by the software reliance on an all words match, despite search criteria set to “fuzzy” so as to detect partial matches. |
| 492403ec672f-68d6-4ae1-b305-6c871de7b84e | Not Translated (0%) | This meant that the software failed to match “Almaz Antey” when Cobham searched for “Almaz Antey Telecom.” | This meant that the software failed to match “Almaz Antey” when Cobham searched for “Almaz Antey Telecom.” |
| 492503ec672f-68d6-4ae1-b305-6c871de7b84e | Not Translated (0%) | Upon discovery, Cobham voluntarily self-disclosed, and the apparent violations were deemed non-egregious. | Upon discovery, Cobham voluntarily self-disclosed, and the apparent violations were deemed non-egregious. |
| 4926a4429117-c536-4e44-b01c-00a15cebe61d | Not Translated (0%) | US Department of the Treasury, Enforcement Information for November 27, 2018. | US Department of the Treasury, Enforcement Information for November 27, 2018. |
| 492712908e2e-21a2-4499-abcc-689eda1baa49 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 4928d69b560b-b0fa-4e1c-a5ee-4ef087713042 | Not Translated (0%) | A risk-based approach that includes enhanced measures is required when dealing with high-risk jurisdictions. | A risk-based approach that includes enhanced measures is required when dealing with high-risk jurisdictions. |
| 49299cde6b65-1dba-4f07-afde-3714c45e3488 | Not Translated (0%) | Firms using ASTs should understand the limitations and functionality of their software, ideally through internal testing and tuning. | Firms using ASTs should understand the limitations and functionality of their software, ideally through internal testing and tuning. |
| 4930991b1deb-cf01-4e1e-b7c5-e702522f954b | Not Translated (0%) | Sanctions lists are constantly in flux, and business activity that is allowable one day may be sanctioned the next, resulting in liability even if the underlying contract was entered into before the sanctions were effective. | Sanctions lists are constantly in flux, and business activity that is allowable one day may be sanctioned the next, resulting in liability even if the underlying contract was entered into before the sanctions were effective. |
| 4931747f2ba4-5abb-49cd-b426-c68bfb0a9861 | Not Translated (0%) | Sanctions Investigations and Assets Freezing | Sanctions Investigations and Assets Freezing |
| 49328dab9c7d-d4b0-432b-952a-31efc9dfc343 | Not Translated (0%) | Conducting Investigations | Conducting Investigations |
| 49333041e0a3-00e0-46a2-9183-53a06986c016 | Not Translated (0%) | The term “investigation” must be precisely defined before we go on to describe the process and considerations involved in conducting sanctions investigations. | The term “investigation” must be precisely defined before we go on to describe the process and considerations involved in conducting sanctions investigations. |
| 49343041e0a3-00e0-46a2-9183-53a06986c016 | Not Translated (0%) | In this context, investigation refers to the process of examining information that suggests whether or not someone might be a sanctions target or have a link to a sanctioned activity or jurisdiction. | In this context, investigation refers to the process of examining information that suggests whether or not someone might be a sanctions target or have a link to a sanctioned activity or jurisdiction. |
| 49353041e0a3-00e0-46a2-9183-53a06986c016 | Not Translated (0%) | Two common scenarios that trigger an investigation are when (1) there is a possible name match between the customer and a sanctions target flagged by the screening tool, and (2) the customer’s behavior, or information given by or about them, indicates possible evasion activity or presents a sanctions link. | Two common scenarios that trigger an investigation are when (1) there is a possible name match between the customer and a sanctions target flagged by the screening tool, and (2) the customer’s behavior, or information given by or about them, indicates possible evasion activity or presents a sanctions link. |
| 49365640fa32-f8b4-4dee-8f22-e71a9d02213f | Not Translated (0%) | Regardless of the unique details of each case, every investigation usually consists of two main parts: simple checks (to discount or confirm a sanctions link), and further investigation (account review, customer outreach, and possible escalation to the compliance function or other specialized unit as should be indicated in the institution’s written policies). | Regardless of the unique details of each case, every investigation usually consists of two main parts: simple checks (to discount or confirm a sanctions link), and further investigation (account review, customer outreach, and possible escalation to the compliance function or other specialized unit as should be indicated in the institution’s written policies). |
| 4937fac90f9d-cf3e-4c30-ba5a-dd3ee620ab32 | Not Translated (0%) | Simple checks might include comparing data about a sanctions target or their activities to the sanctions due diligence (SDD) records you already hold. | Simple checks might include comparing data about a sanctions target or their activities to the sanctions due diligence (SDD) records you already hold. |
| 4938ec2b6cec-1869-41cc-82ae-29fa4bcbf5d3 | Not Translated (0%) | Further investigation entails more detailed checking, which is required when initial (simple) checks cannot confirm or discount the match or link. | Further investigation entails more detailed checking, which is required when initial (simple) checks cannot confirm or discount the match or link. |
| 4939ec2b6cec-1869-41cc-82ae-29fa4bcbf5d3 | Not Translated (0%) | Simple checks generally occur at the alert level while further investigation occurs after an alert has been escalated to a case. | Simple checks generally occur at the alert level while further investigation occurs after an alert has been escalated to a case. |
| 4940ec2b6cec-1869-41cc-82ae-29fa4bcbf5d3 | Not Translated (0%) | When further investigation is needed, the case generally escalates to the compliance function or some specialized unit identified in the institution’s written policies. | When further investigation is needed, the case generally escalates to the compliance function or some specialized unit identified in the institution’s written policies. |
| 4941ec2b6cec-1869-41cc-82ae-29fa4bcbf5d3 | Not Translated (0%) | In most instances, this is a complex but largely predictable process that often involves a review of previous account activity and/or connecting with the customer directly for additional information. | In most instances, this is a complex but largely predictable process that often involves a review of previous account activity and/or connecting with the customer directly for additional information. |
| 4942d38740ec-2d52-4b10-a637-9c0197afecc8 | Not Translated (0%) | Key Investigation Concepts: | Key Investigation Concepts: |
| 4943d38740ec-2d52-4b10-a637-9c0197afecc8 | Not Translated (0%) | Sanctions Lists, Screening Tools, and Identifiers | Sanctions Lists, Screening Tools, and Identifiers |
| 4944c5d831a8-8f13-46c3-989e-15d5a010452f | Not Translated (0%) | Before examining the investigation process in detail, it is helpful to review a few key concepts that form the foundation of every effective investigation. | Before examining the investigation process in detail, it is helpful to review a few key concepts that form the foundation of every effective investigation. |
| 4945c5d831a8-8f13-46c3-989e-15d5a010452f | Not Translated (0%) | Three key concepts shared by all investigations include sanctions lists, screening tools, and identifiers (of individuals as well as various legal entities). | Three key concepts shared by all investigations include sanctions lists, screening tools, and identifiers (of individuals as well as various legal entities). |
| 494608184c4d-4d6e-4181-8c89-2d5174c89e7d | Not Translated (0%) | SANCTIONS LISTS | SANCTIONS LISTS |
| 49473858ca65-4732-4ff6-9dfb-4341f1d0668b | Not Translated (0%) | Sanctions lists are diverse compilations of data about sanctions targets. | Sanctions lists are diverse compilations of data about sanctions targets. |
| 49483858ca65-4732-4ff6-9dfb-4341f1d0668b | Not Translated (0%) | These lists are issued by different regulators, and vary widely in terms of what information they provide and how much detail they provide about that information. | These lists are issued by different regulators, and vary widely in terms of what information they provide and how much detail they provide about that information. |
| 49493858ca65-4732-4ff6-9dfb-4341f1d0668b | Not Translated (0%) | Sanctions lists are living documents—they are constantly changing—so investigators need to check these lists multiple times throughout an investigation and note the date and time every time the lists are checked. | Sanctions lists are living documents—they are constantly changing—so investigators need to check these lists multiple times throughout an investigation and note the date and time every time the lists are checked. |
| 49503858ca65-4732-4ff6-9dfb-4341f1d0668b | Not Translated (0%) | Additions and deletions to sanctions lists are made frequently and can occur without prior notice. | Additions and deletions to sanctions lists are made frequently and can occur without prior notice. |
| 4951ceeedb2d-5a46-4f5f-818a-5d44629d54d6 | Not Translated (0%) | SCREENING TOOLS | SCREENING TOOLS |
| 49527356da03-995d-49a3-926b-6c19e8fe7163 | Not Translated (0%) | Automated Screening Tools (ASTs) are complex programs that—at their best—sift through masses of data points and provide timely, appropriate, and accurate alerts to possible matches between customers and possible or known sanctions risks. | Automated Screening Tools (ASTs) are complex programs that—at their best—sift through masses of data points and provide timely, appropriate, and accurate alerts to possible matches between customers and possible or known sanctions risks. |
| 49537356da03-995d-49a3-926b-6c19e8fe7163 | Not Translated (0%) | Terms commonly used when investigating alerts from ASTs include “hit,” “potential match,” “or name match;” “alert” or “case;” “target match” or “true match;” and “false positive” and “false negative.” | Terms commonly used when investigating alerts from ASTs include “hit,” “potential match,” “or name match;” “alert” or “case;” “target match” or “true match;” and “false positive” and “false negative.” |
| 4954990730a7-2ae0-4dc0-93d3-c138b9940c05 | Not Translated (0%) | IDENTIFIERS | IDENTIFIERS |
| 4955a0d70f54-4834-4e2a-b858-f27c6941714f | Not Translated (0%) | Identifiers can be divided into two main categories: those for individuals, and those for legal entities. | Identifiers can be divided into two main categories: those for individuals, and those for legal entities. |
| 4956a0d70f54-4834-4e2a-b858-f27c6941714f | Not Translated (0%) | During an investigation, it is necessary to examine both categories in order to identify possible sanctions risks associated with a customer or third party. | During an investigation, it is necessary to examine both categories in order to identify possible sanctions risks associated with a customer or third party. |
| 495761e19257-9678-4375-ae7b-4768358cd798 | Not Translated (0%) | Key identifiers for individuals include names and aliases (“AKA” or “also known as”), jurisdiction, date of birth, associations and linkages, passport and/or national identification number, and other government-issued documents such as a driver’s license, social security card, or voter registration card. | Key identifiers for individuals include names and aliases (“AKA” or “also known as”), jurisdiction, date of birth, associations and linkages, passport and/or national identification number, and other government-issued documents such as a driver’s license, social security card, or voter registration card. |
| 4958a466ed2d-bdb2-46f4-aedc-90312efc7c14 | Not Translated (0%) | Shifting our focus to key identifiers for legal entities, it is necessary to examine a broader set of data that includes: | Shifting our focus to key identifiers for legal entities, it is necessary to examine a broader set of data that includes: |
| 495913f3b500-e8e0-4fa4-8bb7-c41b7a0ef1b3 | Not Translated (0%) | The legal entity’s registered or corporate name and registration number | The legal entity’s registered or corporate name and registration number |
| 49607e967068-22ea-412e-bcd7-c315906934aa | Not Translated (0%) | The entity’s registered or legal address, its main place(s) of business, and/or any known operating addresses | The entity’s registered or legal address, its main place(s) of business, and/or any known operating addresses |
| 496123dff859-550e-4a5d-9d8b-b62000bda29b | Not Translated (0%) | The jurisdiction associated with the entity and/or its activities | The jurisdiction associated with the entity and/or its activities |
| 4962ca14ae0d-ee41-4403-b554-76e35cbaa39a | Not Translated (0%) | The names of all associated entities or individuals | The names of all associated entities or individuals |
| 496397e88efd-46ac-4242-84eb-c0b1410eb50e | Not Translated (0%) | Any web or email addresses and telephone or fax numbers associated with the entity | Any web or email addresses and telephone or fax numbers associated with the entity |
| 49647d32b56d-45ce-4ed7-bb5b-15f70b6419a0 | Not Translated (0%) | Any other identifying details about the entity | Any other identifying details about the entity |
| 4965513a5e98-6e74-421e-875a-1ba4f42cd73e | Not Translated (0%) | Additionally, since legal entities are generally made up of multiple individuals in various assigned roles, it’s necessary to gather and examine data on the individuals involved in the ownership, control, and operation of the legal entity. | Additionally, since legal entities are generally made up of multiple individuals in various assigned roles, it’s necessary to gather and examine data on the individuals involved in the ownership, control, and operation of the legal entity. |
| 4966513a5e98-6e74-421e-875a-1ba4f42cd73e | Not Translated (0%) | These individuals include beneficial owners, controllers, executives, directors, and other key players. | These individuals include beneficial owners, controllers, executives, directors, and other key players. |
| 4967513a5e98-6e74-421e-875a-1ba4f42cd73e | Not Translated (0%) | It could also be useful to gather information on key suppliers, clients, and contractors. | It could also be useful to gather information on key suppliers, clients, and contractors. |
| 496876459fa3-15c9-411c-9f23-c3191993c4ce | Not Translated (0%) | Key Risk Areas | Key Risk Areas |
| 4969e303a9a5-5ccd-4d7d-bfb1-2dd50dd8141a | Not Translated (0%) | In any investigation, you need to gather and analyze as much pertinent information as possible about customers or third parties. | In any investigation, you need to gather and analyze as much pertinent information as possible about customers or third parties. |
| 4970e303a9a5-5ccd-4d7d-bfb1-2dd50dd8141a | Not Translated (0%) | In this data-driven era, investigators can struggle with the problem of too much data as well as too little of it. | In this data-driven era, investigators can struggle with the problem of too much data as well as too little of it. |
| 4971e303a9a5-5ccd-4d7d-bfb1-2dd50dd8141a | Not Translated (0%) | Sometimes, especially in fraud cases, data could be designed to be intentionally misleading. | Sometimes, especially in fraud cases, data could be designed to be intentionally misleading. |
| 4972e303a9a5-5ccd-4d7d-bfb1-2dd50dd8141a | Not Translated (0%) | As you conduct an investigation, it can be helpful to remember that there are three key risk areas about which to collect, review, and analyze information. | As you conduct an investigation, it can be helpful to remember that there are three key risk areas about which to collect, review, and analyze information. |
| 4973e303a9a5-5ccd-4d7d-bfb1-2dd50dd8141a | Not Translated (0%) | These three common risk areas cover: | These three common risk areas cover: |
| 49744b8ef1d6-a6ba-4601-b823-3d9b200c10cf | Not Translated (0%) | Information about your customers or third parties (including who owns or controls a legal entity if that is your customer) | Information about your customers or third parties (including who owns or controls a legal entity if that is your customer) |
| 4975318b420a-d589-41b2-b2b3-b8d21ba3cfb4 | Not Translated (0%) | Information about the customer’s activities (or about their business, if the customer is a legal entity) | Information about the customer’s activities (or about their business, if the customer is a legal entity) |
| 497635619996-9770-4dab-92fb-7e55f59e4ba0 | Not Translated (0%) | Information about jurisdiction or geographic connections the customer or legal entity might have | Information about jurisdiction or geographic connections the customer or legal entity might have |
| 4977d0f5d849-ce94-4e88-a377-8e1780cdc54f | Not Translated (0%) | The Investigation Process | The Investigation Process |
| 497884b9eb6a-0574-4d4f-aec1-011d557d3641 | Not Translated (0%) | Imagine you receive an alert from one of your ASTs. | Imagine you receive an alert from one of your ASTs. |
| 497984b9eb6a-0574-4d4f-aec1-011d557d3641 | Not Translated (0%) | What happens next? | What happens next? |
| 498084b9eb6a-0574-4d4f-aec1-011d557d3641 | Not Translated (0%) | Who is responsible for beginning an investigation, and what steps do they need to take first, second, third, and so on? | Who is responsible for beginning an investigation, and what steps do they need to take first, second, third, and so on? |
| 498184b9eb6a-0574-4d4f-aec1-011d557d3641 | Not Translated (0%) | Answering these questions will be the focus of this section. | Answering these questions will be the focus of this section. |
| 4982cada874f-e14a-4d80-90ea-aeb54b6961c7 | Not Translated (0%) | Responding to alerts is handled differently by different companies, but most often it is handled entirely by a company’s compliance function. | Responding to alerts is handled differently by different companies, but most often it is handled entirely by a company’s compliance function. |
| 4983cada874f-e14a-4d80-90ea-aeb54b6961c7 | Not Translated (0%) | This role could be assigned to a dedicated unit or team, which itself could be part of a department or division that is typically part of the “second line of defense.” | This role could be assigned to a dedicated unit or team, which itself could be part of a department or division that is typically part of the “second line of defense.” |
| 4984cada874f-e14a-4d80-90ea-aeb54b6961c7 | Not Translated (0%) | As part of the compliance function, the alert monitoring team will take the initial steps, including weeding out any clear false positives by discovering clear mismatches or with minimal due diligence. | As part of the compliance function, the alert monitoring team will take the initial steps, including weeding out any clear false positives by discovering clear mismatches or with minimal due diligence. |
| 4985cada874f-e14a-4d80-90ea-aeb54b6961c7 | Not Translated (0%) | In many cases, a simple check will resolve the issue. | In many cases, a simple check will resolve the issue. |
| 4986cada874f-e14a-4d80-90ea-aeb54b6961c7 | Not Translated (0%) | For example, if the name that triggered the alert is that of a legal entity or a vessel, and the sanctions lists only refer to natural persons, the alert could be dismissed. | For example, if the name that triggered the alert is that of a legal entity or a vessel, and the sanctions lists only refer to natural persons, the alert could be dismissed. |
| 4987cada874f-e14a-4d80-90ea-aeb54b6961c7 | Not Translated (0%) | Similarly, if an alert identifies a natural person and you can quickly identify the gender and year of birth but the names on the targets list refer to persons of a different gender or year of birth, you can consider that it could be a false positive. | Similarly, if an alert identifies a natural person and you can quickly identify the gender and year of birth but the names on the targets list refer to persons of a different gender or year of birth, you can consider that it could be a false positive. |
| 49889b4eea7b-35a1-4fd8-aee9-1f06022fae7d | Not Translated (0%) | If an alert cannot easily be determined to be a false positive—for example, it is a target match for an existing sanctions identifier—the alerts team will generally recommend the initiation of a case investigation. | If an alert cannot easily be determined to be a false positive—for example, it is a target match for an existing sanctions identifier—the alerts team will generally recommend the initiation of a case investigation. |
| 49899b4eea7b-35a1-4fd8-aee9-1f06022fae7d | Not Translated (0%) | To initiate a case investigation, the alert monitoring team will help to locate the due diligence file already held by the business, as well as any other additional information available. | To initiate a case investigation, the alert monitoring team will help to locate the due diligence file already held by the business, as well as any other additional information available. |
| 49909b4eea7b-35a1-4fd8-aee9-1f06022fae7d | Not Translated (0%) | If the team still believes that the concern cannot be discounted, it will escalate the case to the dedicated investigation team for further investigation. | If the team still believes that the concern cannot be discounted, it will escalate the case to the dedicated investigation team for further investigation. |
| 4991db793dfd-5873-4b24-ae09-58075ed640f5 | Not Translated (0%) | Using a Decision Tree for Investigations | Using a Decision Tree for Investigations |
| 4992e1eb0909-6b88-4a0d-b117-c424d263b9ba | Not Translated (0%) | Although the details of every investigation are unique, most investigations share a common process. | Although the details of every investigation are unique, most investigations share a common process. |
| 4993e1eb0909-6b88-4a0d-b117-c424d263b9ba | Not Translated (0%) | Case investigation teams and alert management teams often use a five-step decision tree to determine which alerts can reasonably be discounted and which others warrant an investigation. | Case investigation teams and alert management teams often use a five-step decision tree to determine which alerts can reasonably be discounted and which others warrant an investigation. |
| 4994e1eb0909-6b88-4a0d-b117-c424d263b9ba | Not Translated (0%) | Before beginning any investigation, it helps to understand the process to follow to determine whether the party being investigated poses an actual sanctions risk or not. | Before beginning any investigation, it helps to understand the process to follow to determine whether the party being investigated poses an actual sanctions risk or not. |
| 4995e1eb0909-6b88-4a0d-b117-c424d263b9ba | Not Translated (0%) | With that in mind, it is recommended to take a question-by-question look at a simplified decision tree that will help keep the investigation on track. | With that in mind, it is recommended to take a question-by-question look at a simplified decision tree that will help keep the investigation on track. |
| 4996e1eb0909-6b88-4a0d-b117-c424d263b9ba | Not Translated (0%) | Different organizations will probably have additional rules for investigations, which should be fully described in a written procedure. | Different organizations will probably have additional rules for investigations, which should be fully described in a written procedure. |
| 4997e1eb0909-6b88-4a0d-b117-c424d263b9ba | Not Translated (0%) | After the investigator receives a report from the AST system identifying an alert as a red flag and describing the possible link with one or more sanctions targets, the five-step decision tree should be implemented to answer the common, fundamental questions that guide any investigation from start to finish in a methodical, thorough, and reliable manner. | After the investigator receives a report from the AST system identifying an alert as a red flag and describing the possible link with one or more sanctions targets, the five-step decision tree should be implemented to answer the common, fundamental questions that guide any investigation from start to finish in a methodical, thorough, and reliable manner. |
| 49981f829662-3b1e-4757-8789-541be4e8b302 | Not Translated (0%) | Investigation Process | Investigation Process |
| 4999c43cadee-26f5-46bb-a625-66ad9474c549 | Not Translated (0%) | STEP 1: | STEP 1: |
| 5000c43cadee-26f5-46bb-a625-66ad9474c549 | Not Translated (0%) | ASK, “IS THERE AN APPLICABLE SANCTIONS RESTRICTION?” | ASK, “IS THERE AN APPLICABLE SANCTIONS RESTRICTION?” |
| 5001100ca9aa-8b1c-4d93-a540-031e9e296f79 | Not Translated (0%) | The first step is to determine whether a sanctions restriction applies to the case under investigation. | The first step is to determine whether a sanctions restriction applies to the case under investigation. |
| 5002100ca9aa-8b1c-4d93-a540-031e9e296f79 | Not Translated (0%) | In order to answer this broad question, investigators need to answer its related sub-questions: | In order to answer this broad question, investigators need to answer its related sub-questions: |
| 5003ea095c7e-7e09-4e90-83c5-81cf2826b902 | Not Translated (0%) | Does a UN, EU, US Office of Foreign Asset Control (OFAC), or other national sanction apply? | Does a UN, EU, US Office of Foreign Asset Control (OFAC), or other national sanction apply? |
| 5004ea095c7e-7e09-4e90-83c5-81cf2826b902 | Not Translated (0%) | If so, which one(s)? | If so, which one(s)? |
| 5005ea095c7e-7e09-4e90-83c5-81cf2826b902 | Not Translated (0%) | Recall that sanctions imposed by the United Nations, the European Union, and other countries around the world might apply to both individuals and entities, and to certain activities and countries. | Recall that sanctions imposed by the United Nations, the European Union, and other countries around the world might apply to both individuals and entities, and to certain activities and countries. |
| 5006ea095c7e-7e09-4e90-83c5-81cf2826b902 | Not Translated (0%) | In addition, the geographic scope of some sanctions will extend beyond a particular country’s borders, in cases of extraterritorial application. | In addition, the geographic scope of some sanctions will extend beyond a particular country’s borders, in cases of extraterritorial application. |
| 50073c418021-ee08-4dfd-b0ab-dacd6a64b889 | Not Translated (0%) | If the answer is “no,” an investigation is not required. | If the answer is “no,” an investigation is not required. |
| 5008eb81628a-9f5f-4e51-b922-f2819733bc42 | Not Translated (0%) | STEP 2: | STEP 2: |
| 5009eb81628a-9f5f-4e51-b922-f2819733bc42 | Not Translated (0%) | ASK, “WHAT IS THIS SANCTIONS RESTRICTION ABOUT?” | ASK, “WHAT IS THIS SANCTIONS RESTRICTION ABOUT?” |
| 501019657bc2-8510-4f1a-993d-8d15c331e106 | Not Translated (0%) | Now that the sanctions that might apply to the subject of the investigation have been identified, answer the following question: | Now that the sanctions that might apply to the subject of the investigation have been identified, answer the following question: |
| 5011a2ce1231-321e-4e78-8d1c-e9c66bdc2758 | Not Translated (0%) | What types of restrictions do the applicable sanctions impose? | What types of restrictions do the applicable sanctions impose? |
| 5012a2ce1231-321e-4e78-8d1c-e9c66bdc2758 | Not Translated (0%) | Common examples of sanction-imposed restrictions include freezing assets or blocking property, a general prohibition on all activities and transactions related to a particular country, restrictions specific to certain targets or activities, export bans, and specific licensing requirements. | Common examples of sanction-imposed restrictions include freezing assets or blocking property, a general prohibition on all activities and transactions related to a particular country, restrictions specific to certain targets or activities, export bans, and specific licensing requirements. |
| 5013474b96a9-ecc7-43a7-82d4-041d769b395f | Not Translated (0%) | STEP 3: | STEP 3: |
| 5014474b96a9-ecc7-43a7-82d4-041d769b395f | Not Translated (0%) | ASK, “HAS THIS SANCTIONS RESTRICTION BEEN VIOLATED?” | ASK, “HAS THIS SANCTIONS RESTRICTION BEEN VIOLATED?” |
| 50158f7c4326-db67-4241-b13f-380f3e8a3634 | Not Translated (0%) | The third step in the decision tree for investigations is to determine whether or not the sanctions that might apply have actually been violated. | The third step in the decision tree for investigations is to determine whether or not the sanctions that might apply have actually been violated. |
| 50168f7c4326-db67-4241-b13f-380f3e8a3634 | Not Translated (0%) | In this step, the team will use the information it has gathered about the party under investigation to ask the following questions: | In this step, the team will use the information it has gathered about the party under investigation to ask the following questions: |
| 50177bbadad2-42f9-426c-ab75-ebbfa49e27a0 | Not Translated (0%) | Has this sanctions restriction been violated? | Has this sanctions restriction been violated? |
| 50187bbadad2-42f9-426c-ab75-ebbfa49e27a0 | Not Translated (0%) | To answer this question, the team will turn its attention to the information gathered during SDD, augmented by information about the party’s transaction activity and history. | To answer this question, the team will turn its attention to the information gathered during SDD, augmented by information about the party’s transaction activity and history. |
| 50197bbadad2-42f9-426c-ab75-ebbfa49e27a0 | Not Translated (0%) | Specifically, the organization’s investigation team needs to answer the following questions about the relationship between the organization and the target of the investigation: | Specifically, the organization’s investigation team needs to answer the following questions about the relationship between the organization and the target of the investigation: |
| 502069c2487d-923e-46b1-9395-6e629256ab16 | Not Translated (0%) | Does the financial institution have a relationship with the sanctions target? | Does the financial institution have a relationship with the sanctions target? |
| 5021f4880bb9-3095-4a0d-9b27-41aebbaedd0b | Not Translated (0%) | Has the financial institution made funds available to the target? | Has the financial institution made funds available to the target? |
| 5022aebfa381-2495-49ad-87b7-3f3c2e685a70 | Not Translated (0%) | Has the financial institution facilitated a transaction for, or on behalf of, the target, or facilitated trade activity that is prohibited or restricted? | Has the financial institution facilitated a transaction for, or on behalf of, the target, or facilitated trade activity that is prohibited or restricted? |
| 502339307179-a8b3-4369-8136-c673b26abead | Not Translated (0%) | If the answer is “no,” further investigation is not required. | If the answer is “no,” further investigation is not required. |
| 502420ef5bfa-597b-4ee8-a652-0cdcb3809274 | Not Translated (0%) | STEP 4: | STEP 4: |
| 502520ef5bfa-597b-4ee8-a652-0cdcb3809274 | Not Translated (0%) | ASK, “HOW HAS THE SANCTIONS VIOLATION OCCURRED?” | ASK, “HOW HAS THE SANCTIONS VIOLATION OCCURRED?” |
| 50268726144b-a48b-4b28-82ab-f4dbc0acb536 | Not Translated (0%) | If it is determined that a sanctions restriction has been violated, the fourth step in the investigation process is to determine how the violation occurred. | If it is determined that a sanctions restriction has been violated, the fourth step in the investigation process is to determine how the violation occurred. |
| 50278726144b-a48b-4b28-82ab-f4dbc0acb536 | Not Translated (0%) | In other words, if a restriction has been violated, what was the root cause that ultimately led to that violation? | In other words, if a restriction has been violated, what was the root cause that ultimately led to that violation? |
| 50288726144b-a48b-4b28-82ab-f4dbc0acb536 | Not Translated (0%) | How did the violation occur? | How did the violation occur? |
| 5029009f3bba-78c2-4f0a-ae09-43d8f586c0cd | Not Translated (0%) | The objective here is to determine if the violation was caused by “mechanical” causes, which may require some adjustments in the future (for instance, fine tuning the alert filters in the AST system), or “human” causes, such as internal or external stripping, which could signal criminal behavior. | The objective here is to determine if the violation was caused by “mechanical” causes, which may require some adjustments in the future (for instance, fine tuning the alert filters in the AST system), or “human” causes, such as internal or external stripping, which could signal criminal behavior. |
| 50301de31720-308d-4a05-a83f-189c8fd68a23 | Not Translated (0%) | Determine the root cause of the alert. | Determine the root cause of the alert. |
| 50311de31720-308d-4a05-a83f-189c8fd68a23 | Not Translated (0%) | At this stage we determine if the alert is genuine; a violation has only occurred if the alert “correctly” flagged a prohibited transaction. | At this stage we determine if the alert is genuine; a violation has only occurred if the alert “correctly” flagged a prohibited transaction. |
| 50321de31720-308d-4a05-a83f-189c8fd68a23 | Not Translated (0%) | A violation has not necessarily occurred. | A violation has not necessarily occurred. |
| 50331de31720-308d-4a05-a83f-189c8fd68a23 | Not Translated (0%) | Was the alert the result of human error? | Was the alert the result of human error? |
| 50341de31720-308d-4a05-a83f-189c8fd68a23 | Not Translated (0%) | Deliberate circumvention? | Deliberate circumvention? |
| 50351de31720-308d-4a05-a83f-189c8fd68a23 | Not Translated (0%) | External stripping in payment messages by an outside organization? | External stripping in payment messages by an outside organization? |
| 50361de31720-308d-4a05-a83f-189c8fd68a23 | Not Translated (0%) | Inadequate training? | Inadequate training? |
| 50371de31720-308d-4a05-a83f-189c8fd68a23 | Not Translated (0%) | An improperly calibrated automated screening tool? | An improperly calibrated automated screening tool? |
| 50381de31720-308d-4a05-a83f-189c8fd68a23 | Not Translated (0%) | This step is crucial in determining if this is an isolated incident or if an investigation is required to determine if other violations may have occurred. | This step is crucial in determining if this is an isolated incident or if an investigation is required to determine if other violations may have occurred. |
| 5039ebd2cb0f-efeb-4c80-8513-082d538f504c | Not Translated (0%) | Establishing the cause of a violation—determining its original source—is absolutely critical if you want to take steps to ensure similar violations will not occur in the future. | Establishing the cause of a violation—determining its original source—is absolutely critical if you want to take steps to ensure similar violations will not occur in the future. |
| 504060b30737-7220-48bc-bcb0-93a2b74322f1 | Not Translated (0%) | STEP 5: | STEP 5: |
| 504160b30737-7220-48bc-bcb0-93a2b74322f1 | Not Translated (0%) | RECORD AND DOCUMENT | RECORD AND DOCUMENT |
| 504276cf9ff3-e257-4c2b-8858-fc00856a6b15 | Not Translated (0%) | The final step in the five-step investigation process is every bit as important as the first four: | The final step in the five-step investigation process is every bit as important as the first four: |
| 5043a71584cf-cc8b-45f6-bb1a-74efa92f117a | Not Translated (0%) | Record and document the findings. | Record and document the findings. |
| 5044a71584cf-cc8b-45f6-bb1a-74efa92f117a | Not Translated (0%) | It can be tempting to treat this step as a bit of an afterthought, but do not fall into that trap. | It can be tempting to treat this step as a bit of an afterthought, but do not fall into that trap. |
| 5045a71584cf-cc8b-45f6-bb1a-74efa92f117a | Not Translated (0%) | Creating and keeping a clear, thorough, and orderly record of the investigation and its findings, and doing so while the case is still fresh, is absolutely essential. | Creating and keeping a clear, thorough, and orderly record of the investigation and its findings, and doing so while the case is still fresh, is absolutely essential. |
| 5046a71584cf-cc8b-45f6-bb1a-74efa92f117a | Not Translated (0%) | In the report, indicate the dates and times each step is taken. | In the report, indicate the dates and times each step is taken. |
| 5047a71584cf-cc8b-45f6-bb1a-74efa92f117a | Not Translated (0%) | This could be critical if the investigation includes searches against sanctions lists, because names on the lists are regularly added or subtracted by OFAC or other competent agencies. | This could be critical if the investigation includes searches against sanctions lists, because names on the lists are regularly added or subtracted by OFAC or other competent agencies. |
| 5048a71584cf-cc8b-45f6-bb1a-74efa92f117a | Not Translated (0%) | Accurately document every step taken and every piece of information discovered. | Accurately document every step taken and every piece of information discovered. |
| 5049a71584cf-cc8b-45f6-bb1a-74efa92f117a | Not Translated (0%) | File the complete and final report securely, following your organization’s guidelines. | File the complete and final report securely, following your organization’s guidelines. |
| 5050c4abdf88-2c96-4b5e-9fbd-9806e5a88410 | Not Translated (0%) | Regulators expect complete and accurate recordkeeping, including dates that sanctions investigations were undertaken by an organization and the decisions made based on those findings. | Regulators expect complete and accurate recordkeeping, including dates that sanctions investigations were undertaken by an organization and the decisions made based on those findings. |
| 5051c4abdf88-2c96-4b5e-9fbd-9806e5a88410 | Not Translated (0%) | In addition, regulators have stringent reporting requirements when it comes to assets or funds that have been frozen, and all records pertaining to blocked funds must be kept for a minimum of five years. | In addition, regulators have stringent reporting requirements when it comes to assets or funds that have been frozen, and all records pertaining to blocked funds must be kept for a minimum of five years. |
| 505205924579-96b7-449b-b47e-569919f68810 | Not Translated (0%) | At a minimum, every complete report should include the following documents and information: | At a minimum, every complete report should include the following documents and information: |
| 505369e9f002-8a92-4e2e-b207-6697de19059d | Not Translated (0%) | An explanation of how the alert was triggered and if there were any precedents | An explanation of how the alert was triggered and if there were any precedents |
| 5054cf590129-a5ec-467b-8f31-53add86930cd | Not Translated (0%) | A detailed, step-by-step description of the investigation, including the dates and times of each step and the names of the investigators for each step | A detailed, step-by-step description of the investigation, including the dates and times of each step and the names of the investigators for each step |
| 5055780ab2a6-2010-4701-aa19-57894544adf6 | Not Translated (0%) | A description of the review process, including dates and names of the reviewers and conclusions reached | A description of the review process, including dates and names of the reviewers and conclusions reached |
| 5056524eb896-d109-4216-8d9b-5f7f7d92a5eb | Not Translated (0%) | Additional research or steps undertaken, if applicable | Additional research or steps undertaken, if applicable |
| 505713475114-f332-460f-9405-8820cc103c0d | Not Translated (0%) | An explanation of the final review and decisions taken | An explanation of the final review and decisions taken |
| 5058b412ed0f-c45e-4280-8370-f219ce7a0653 | Not Translated (0%) | Each institution should have in place a written policy outlining the reporting process, and naturally you should adhere to that policy or escalate the investigation if you perceive any conflict between the implementation of the policy and applicable regulations. | Each institution should have in place a written policy outlining the reporting process, and naturally you should adhere to that policy or escalate the investigation if you perceive any conflict between the implementation of the policy and applicable regulations. |
| 5059930c9a69-6e1d-4d2a-8196-e11a87ec2639 | Not Translated (0%) | Applying the Decision Tree to Different Types of Matches | Applying the Decision Tree to Different Types of Matches |
| 50605b25225f-fc04-4172-80ae-5d52f8f7b56c | Not Translated (0%) | The five-step decision tree investigation process can be applied to different match types while conducting an investigation. | The five-step decision tree investigation process can be applied to different match types while conducting an investigation. |
| 50615b25225f-fc04-4172-80ae-5d52f8f7b56c | Not Translated (0%) | An investigation is best accomplished by taking one manageable step at a time. | An investigation is best accomplished by taking one manageable step at a time. |
| 50625b25225f-fc04-4172-80ae-5d52f8f7b56c | Not Translated (0%) | One way of simplifying the process is by dividing all possible matches into four separate and distinct types: | One way of simplifying the process is by dividing all possible matches into four separate and distinct types: |
| 50632d6a1397-c2d8-40f5-9304-3251958b624f | Not Translated (0%) | Matches to an individual’s name | Matches to an individual’s name |
| 5064254d3487-9155-4247-bd74-1395cdc50975 | Not Translated (0%) | Matches to an entity’s name | Matches to an entity’s name |
| 50656bbdc0c6-35ec-45d0-a665-ccf0ae035c78 | Not Translated (0%) | Matches to jurisdiction and nature of business | Matches to jurisdiction and nature of business |
| 506647057bf5-7481-43b1-af2c-af94beefe7dc | Not Translated (0%) | Matches in transactions | Matches in transactions |
| 50675c4a4417-db2b-48bf-8c14-31e626ab00f9 | Not Translated (0%) | Next, you will explore how to evaluate each type of match. | Next, you will explore how to evaluate each type of match. |
| 5068e8e894c4-d076-4234-925c-61dcde91067c | Not Translated (0%) | MATCHES TO AN INDIVIDUAL’S NAME | MATCHES TO AN INDIVIDUAL’S NAME |
| 5069400338b9-4a86-4cc7-8b34-4569fd2bfcb0 | Not Translated (0%) | OFAC recommends a multi-step assessment process for evaluating name matches. | OFAC recommends a multi-step assessment process for evaluating name matches. |
| 5070400338b9-4a86-4cc7-8b34-4569fd2bfcb0 | Not Translated (0%) | You may want to check their Sanctions Compliance FAQs page on the US treasury website. | You may want to check their Sanctions Compliance FAQs page on the US treasury website. |
| 5071400338b9-4a86-4cc7-8b34-4569fd2bfcb0 | Not Translated (0%) | Like the decision tree used in the initial evaluation of possible sanctions links, this process uses a flow chart of clear, “Yes/ No” questions designed to focus an investigation and move users through a process of elimination to determine the validity of a match. | Like the decision tree used in the initial evaluation of possible sanctions links, this process uses a flow chart of clear, “Yes/ No” questions designed to focus an investigation and move users through a process of elimination to determine the validity of a match. |
| 507243aab459-7d2c-4b83-a2ac-3617cc906961 | Not Translated (0%) | Name Match: | Name Match: |
| 507343aab459-7d2c-4b83-a2ac-3617cc906961 | Not Translated (0%) | Individual or Entity | Individual or Entity |
| 5074e336d73a-6ffa-44df-b3d4-69e5725cbb77 | Not Translated (0%) | We’ll use a case example to take a closer look at each individual step, but—taken as a whole—OFAC’s step-by-step assessment flow chart consists of four sequential questions. | We’ll use a case example to take a closer look at each individual step, but—taken as a whole—OFAC’s step-by-step assessment flow chart consists of four sequential questions. |
| 5075d9b70801-6efc-4355-bc80-4f24acf854cc | Not Translated (0%) | Question 1: | Question 1: |
| 5076d9b70801-6efc-4355-bc80-4f24acf854cc | Not Translated (0%) | Is the customer hitting against OFAC’s Specially Designated Nationals and Blocked Persons (SDN) list or targeted countries? | Is the customer hitting against OFAC’s Specially Designated Nationals and Blocked Persons (SDN) list or targeted countries? |
| 5077f7801f88-a37c-421f-81f6-9de2545c6601 | Not Translated (0%) | If YES, continue to the next question. | If YES, continue to the next question. |
| 5078fa84c500-434d-44bb-8274-bc9a1b705a4e | Not Translated (0%) | If NO, this is not a valid match. | If NO, this is not a valid match. |
| 5079d0ed5ee2-9006-4f51-870f-9c6667f09ffa | Not Translated (0%) | Question 2: | Question 2: |
| 5080d0ed5ee2-9006-4f51-870f-9c6667f09ffa | Not Translated (0%) | Is the customer an individual, while the name on the SDN list is a vessel, organization, or company (or vice versa)? | Is the customer an individual, while the name on the SDN list is a vessel, organization, or company (or vice versa)? |
| 50816944a18d-ba47-4b67-bbc6-c0e50b352c61 | Not Translated (0%) | If YES, this is not a valid match. | If YES, this is not a valid match. |
| 50824fc44c25-aaeb-463c-82ec-869f7a28dc8b | Not Translated (0%) | If NO, continue to the next question. | If NO, continue to the next question. |
| 50837b2289b5-43a3-40d0-91c9-b59b2b2d809b | Not Translated (0%) | Question 3: | Question 3: |
| 50847b2289b5-43a3-40d0-91c9-b59b2b2d809b | Not Translated (0%) | Is only one of the names (EITHER the first or given name, OR the family or surname, but not both) a match? | Is only one of the names (EITHER the first or given name, OR the family or surname, but not both) a match? |
| 5085ff4cf742-e335-446d-a62a-7dde4e30a15e | Not Translated (0%) | If YES, this is not a valid match. | If YES, this is not a valid match. |
| 50862eaa37ed-0511-43d1-8ad3-d8fe1e8ad2fa | Not Translated (0%) | If NO, continue to the next question. | If NO, continue to the next question. |
| 508749e2f616-01e2-45db-a2a0-0d86fc782160 | Not Translated (0%) | Question 4: | Question 4: |
| 508849e2f616-01e2-45db-a2a0-0d86fc782160 | Not Translated (0%) | Comparing the complete SDN entry with all of the information you have on the matching customer, are there a number of similarities or exact matches? | Comparing the complete SDN entry with all of the information you have on the matching customer, are there a number of similarities or exact matches? |
| 5089b9c0e6c0-314e-409b-9033-5d4ce9d9392e | Not Translated (0%) | If YES, escalate the case for further review. | If YES, escalate the case for further review. |
| 5090e7bb8629-e4cd-4e9e-8194-18e730841850 | Not Translated (0%) | If NO, this is not a valid match. | If NO, this is not a valid match. |
| 5091eb2d5694-811e-4055-91a1-58ceb49de829 | Not Translated (0%) | CASE EXAMPLE (HYPOTHETICAL): | CASE EXAMPLE (HYPOTHETICAL): |
| 5092eb2d5694-811e-4055-91a1-58ceb49de829 | Not Translated (0%) | MR. | MR. |
| 5093eb2d5694-811e-4055-91a1-58ceb49de829 | Not Translated (0%) | TIMTCHENKO | TIMTCHENKO |
| 509468765db4-c2b2-4b7b-ac38-59f5b9d2054e | Not Translated (0%) | This case example walks through what to do when there is an alert to a name match to an individual. | This case example walks through what to do when there is an alert to a name match to an individual. |
| 509568765db4-c2b2-4b7b-ac38-59f5b9d2054e | Not Translated (0%) | It uses the hypothetical example of an individual wishing to open an account at a financial institution from the perspective of a relationship manager. | It uses the hypothetical example of an individual wishing to open an account at a financial institution from the perspective of a relationship manager. |
| 509668765db4-c2b2-4b7b-ac38-59f5b9d2054e | Not Translated (0%) | An account application from a new customer named Mr. Gennadiy Nikolayevich Timtchenko has just landed in the relationship manager’s inbox for review. | An account application from a new customer named Mr. Gennadiy Nikolayevich Timtchenko has just landed in the relationship manager’s inbox for review. |
| 5097bd43c752-53d5-4549-843b-b73f98d4c2cb | Not Translated (0%) | First, answer Question 1: | First, answer Question 1: |
| 5098bd43c752-53d5-4549-843b-b73f98d4c2cb | Not Translated (0%) | Is the customer hitting against OFAC’s SDN list or targeted countries? | Is the customer hitting against OFAC’s SDN list or targeted countries? |
| 5099919444a8-810f-4dbb-995f-bef3c69cec77 | Not Translated (0%) | During the onboarding process, Mr. Timtchenko’s (full) name—Gennadiy Nikolayevich Timtchenko— is flagged as a potentially valid name match on OFAC’s SDN list. | During the onboarding process, Mr. Timtchenko’s (full) name—Gennadiy Nikolayevich Timtchenko— is flagged as a potentially valid name match on OFAC’s SDN list. |
| 51006cf20bfc-ba63-46bb-a8d3-1bb87f82810b | Not Translated (0%) | <12444>Note</12444>: | <12444>Note</12444>: |
| 51016cf20bfc-ba63-46bb-a8d3-1bb87f82810b | Not Translated (0%) | Names in the OFAC database appear with the family name first, spelled out in all capital/uppercase letters. | Names in the OFAC database appear with the family name first, spelled out in all capital/uppercase letters. |
| 51026cf20bfc-ba63-46bb-a8d3-1bb87f82810b | Not Translated (0%) | So, this individual’s name would appear as TIMTCHENKO Gennadiy Nikolayevich. | So, this individual’s name would appear as TIMTCHENKO Gennadiy Nikolayevich. |
| 5103d47f0ac5-c57f-4b34-8c15-7d2ac84a9fd5 | Not Translated (0%) | In looking at the OFAC SDN entry for Mr. Timtchenko, the manager discovers that his name is flagged as a potential match to three similar but separate entries for sanctions targets. | In looking at the OFAC SDN entry for Mr. Timtchenko, the manager discovers that his name is flagged as a potential match to three similar but separate entries for sanctions targets. |
| 5104d47f0ac5-c57f-4b34-8c15-7d2ac84a9fd5 | Not Translated (0%) | (Read carefully in order to note the differences, as they are not always obvious.) | (Read carefully in order to note the differences, as they are not always obvious.) |
| 5105d47f0ac5-c57f-4b34-8c15-7d2ac84a9fd5 | Not Translated (0%) | This means the answer to Question 1 is YES, and the manager should proceed to Question 2. | This means the answer to Question 1 is YES, and the manager should proceed to Question 2. |
| 5106cc01dc30-832a-4e03-9154-8c5342359ff4 | Not Translated (0%) | Next, answer Question 2: | Next, answer Question 2: |
| 5107cc01dc30-832a-4e03-9154-8c5342359ff4 | Not Translated (0%) | Is the customer an individual, while the name on the SDN list is a vessel, organization, or company (or vice versa)? | Is the customer an individual, while the name on the SDN list is a vessel, organization, or company (or vice versa)? |
| 51084fea5e60-53ee-4c87-87ed-379ef8be4dc4 | Not Translated (0%) | Using both the OFAC SDN information and the information received about Mr. Timtchenko in his account application, it’s necessary to determine whether the name match is in any way related to a legal entity rather than an individual. | Using both the OFAC SDN information and the information received about Mr. Timtchenko in his account application, it’s necessary to determine whether the name match is in any way related to a legal entity rather than an individual. |
| 51094fea5e60-53ee-4c87-87ed-379ef8be4dc4 | Not Translated (0%) | In this case, the customer and the SDN target are both individuals—no entities are mentioned. | In this case, the customer and the SDN target are both individuals—no entities are mentioned. |
| 51104fea5e60-53ee-4c87-87ed-379ef8be4dc4 | Not Translated (0%) | Therefore, the answer to Question 2 is NO. | Therefore, the answer to Question 2 is NO. |
| 51114fea5e60-53ee-4c87-87ed-379ef8be4dc4 | Not Translated (0%) | Proceed to Question 3. | Proceed to Question 3. |
| 5112e4e59440-76a9-4e47-93e4-748775b659d1 | Not Translated (0%) | Now, answer Question 3: | Now, answer Question 3: |
| 5113e4e59440-76a9-4e47-93e4-748775b659d1 | Not Translated (0%) | Is only one of the names (EITHER the first or given name, OR the family or surname, but not both) a match? | Is only one of the names (EITHER the first or given name, OR the family or surname, but not both) a match? |
| 5114f25724e5-4535-4da8-9c94-0593bf22b352 | Not Translated (0%) | To answer this question, you will look closely at all names listed for Mr. Timtchenko. | To answer this question, you will look closely at all names listed for Mr. Timtchenko. |
| 5115f25724e5-4535-4da8-9c94-0593bf22b352 | Not Translated (0%) | Does only ONE name match? | Does only ONE name match? |
| 5116f25724e5-4535-4da8-9c94-0593bf22b352 | Not Translated (0%) | You find slight differences in the way the customer’s name is spelled in his application and the way the matched names are spelled in the screening alert (for example, <12455>Timtchenko </12455>and <12456>Timchenko</12456>, or <12457>Gennadiy </12457>and <12458>Gennady</12458>). | You find slight differences in the way the customer’s name is spelled in his application and the way the matched names are spelled in the screening alert (for example, <12455>Timtchenko </12455>and <12456>Timchenko</12456>, or <12457>Gennadiy </12457>and <12458>Gennady</12458>). |
| 5117f25724e5-4535-4da8-9c94-0593bf22b352 | Not Translated (0%) | However, you also note that the customer’s first name and his family name are exact matches to some of the names listed in the database. | However, you also note that the customer’s first name and his family name are exact matches to some of the names listed in the database. |
| 5118f25724e5-4535-4da8-9c94-0593bf22b352 | Not Translated (0%) | This means the answer to Question 3 is NO. | This means the answer to Question 3 is NO. |
| 5119f25724e5-4535-4da8-9c94-0593bf22b352 | Not Translated (0%) | Proceed to Question 4. | Proceed to Question 4. |
| 5120d252f008-4c3a-460b-84e1-19855c12d0ae | Not Translated (0%) | <12461>Note</12461>: | <12461>Note</12461>: |
| 5121d252f008-4c3a-460b-84e1-19855c12d0ae | Not Translated (0%) | The terms “last name,” “family name,” and “surname” all refer to the same thing: the hereditary name usually shared by all members of a family. | The terms “last name,” “family name,” and “surname” all refer to the same thing: the hereditary name usually shared by all members of a family. |
| 5122d252f008-4c3a-460b-84e1-19855c12d0ae | Not Translated (0%) | Similarly, the terms “first name” and “given name” both refer to a personal name chosen for each individual child and given to that child at birth (or very shortly thereafter). | Similarly, the terms “first name” and “given name” both refer to a personal name chosen for each individual child and given to that child at birth (or very shortly thereafter). |
| 5123d252f008-4c3a-460b-84e1-19855c12d0ae | Not Translated (0%) | In many countries, last names are routinely spelled out using all capital or uppercase letters, especially on forms and documents. | In many countries, last names are routinely spelled out using all capital or uppercase letters, especially on forms and documents. |
| 5124d252f008-4c3a-460b-84e1-19855c12d0ae | Not Translated (0%) | The OFAC database follows this convention. | The OFAC database follows this convention. |
| 5125a57ac9de-8152-4e95-85f4-42044e9fcacc | Not Translated (0%) | Last, answer Question 4: | Last, answer Question 4: |
| 5126a57ac9de-8152-4e95-85f4-42044e9fcacc | Not Translated (0%) | Comparing the complete SDN entry with all of the information you have on the matching customer, are there a number of similarities or exact matches? | Comparing the complete SDN entry with all of the information you have on the matching customer, are there a number of similarities or exact matches? |
| 5127e44c3d3c-7cd0-4365-92a7-93300fcdb2bd | Not Translated (0%) | To answer the final question in OFAC’s four-question process of elimination, it’s necessary to compare the complete collection of data about Mr. Timtchenko found in the SDN entry, including his country of birth, nationality, current residential address, and any other data available. | To answer the final question in OFAC’s four-question process of elimination, it’s necessary to compare the complete collection of data about Mr. Timtchenko found in the SDN entry, including his country of birth, nationality, current residential address, and any other data available. |
| 5128e44c3d3c-7cd0-4365-92a7-93300fcdb2bd | Not Translated (0%) | You find that Mr. Timtchenko reported being born in Armenia; this is an exact match to one of the SDNs identified. | You find that Mr. Timtchenko reported being born in Armenia; this is an exact match to one of the SDNs identified. |
| 5129e44c3d3c-7cd0-4365-92a7-93300fcdb2bd | Not Translated (0%) | He claimed Armenian nationality, which is also an exact match to one of the SDNs in the database. | He claimed Armenian nationality, which is also an exact match to one of the SDNs in the database. |
| 5130e44c3d3c-7cd0-4365-92a7-93300fcdb2bd | Not Translated (0%) | He listed his residential address as being in Hamburg, Germany; the OFAC listing was different, indicating an address in Geneva, Switzerland. | He listed his residential address as being in Hamburg, Germany; the OFAC listing was different, indicating an address in Geneva, Switzerland. |
| 5131e44c3d3c-7cd0-4365-92a7-93300fcdb2bd | Not Translated (0%) | In his application, Mr. Timtchenko listed only the year in which he was born, which was 1952; the sanctions target identifier specifies a day, month, and year (also 1952). | In his application, Mr. Timtchenko listed only the year in which he was born, which was 1952; the sanctions target identifier specifies a day, month, and year (also 1952). |
| 5132e44c3d3c-7cd0-4365-92a7-93300fcdb2bd | Not Translated (0%) | Matching the year of birth is sufficient, even if matching the exact date is not possible—so this is another match. | Matching the year of birth is sufficient, even if matching the exact date is not possible—so this is another match. |
| 5133e44c3d3c-7cd0-4365-92a7-93300fcdb2bd | Not Translated (0%) | A number of similarities or exact matches between the information on the customer’s account application and the complete SDN entry are found. | A number of similarities or exact matches between the information on the customer’s account application and the complete SDN entry are found. |
| 5134e44c3d3c-7cd0-4365-92a7-93300fcdb2bd | Not Translated (0%) | The answer to Question 4 is YES, and the hit cannot be discounted. | The answer to Question 4 is YES, and the hit cannot be discounted. |
| 5135e44c3d3c-7cd0-4365-92a7-93300fcdb2bd | Not Translated (0%) | The next step is to escalate the case for further review. | The next step is to escalate the case for further review. |
| 513603fcaefe-3faa-488c-9550-d9882a418a2c | Not Translated (0%) | <12468>Note</12468>: | <12468>Note</12468>: |
| 513703fcaefe-3faa-488c-9550-d9882a418a2c | Not Translated (0%) | There could be at least one complicating factor. | There could be at least one complicating factor. |
| 513803fcaefe-3faa-488c-9550-d9882a418a2c | Not Translated (0%) | Typically, Timtchenko is listed in OFAC as a transliteration of a Russian or Ukrainian name, originally in the Cyrillic alphabet, and in Russian the patronymic name could vary according to gender. | Typically, Timtchenko is listed in OFAC as a transliteration of a Russian or Ukrainian name, originally in the Cyrillic alphabet, and in Russian the patronymic name could vary according to gender. |
| 513903fcaefe-3faa-488c-9550-d9882a418a2c | Not Translated (0%) | Thus, the spouse (or daughter) of Mr. Timtchenko might be Mrs. or Ms. Timtchenka. | Thus, the spouse (or daughter) of Mr. Timtchenko might be Mrs. or Ms. Timtchenka. |
| 51406d2582ed-db37-41c7-9303-cdb801160841 | Not Translated (0%) | ESCALATING A NAME-MATCH CASE FOR FURTHER REVIEW | ESCALATING A NAME-MATCH CASE FOR FURTHER REVIEW |
| 514187755898-f4ae-41bf-abfa-4e21f4e36704 | Not Translated (0%) | To continue the investigation of the new customer, Mr. Timtchenko, use the five-step investigation process described earlier. | To continue the investigation of the new customer, Mr. Timtchenko, use the five-step investigation process described earlier. |
| 514287755898-f4ae-41bf-abfa-4e21f4e36704 | Not Translated (0%) | Since this is an escalation, you have already answered Step 1 and should begin with Step 2. | Since this is an escalation, you have already answered Step 1 and should begin with Step 2. |
| 51436eca6d7e-a737-4d76-b189-06be401f0b7d | Not Translated (0%) | Step 2: | Step 2: |
| 51446eca6d7e-a737-4d76-b189-06be401f0b7d | Not Translated (0%) | Describe what the sanctions restriction is about. | Describe what the sanctions restriction is about. |
| 514537990870-ccea-4640-8153-0274c50c5f50 | Not Translated (0%) | Here, you will want to verify the accuracy of previous work conducted and, if necessary, confirm the escalation is a target match/true match. | Here, you will want to verify the accuracy of previous work conducted and, if necessary, confirm the escalation is a target match/true match. |
| 514637990870-ccea-4640-8153-0274c50c5f50 | Not Translated (0%) | In Mr. Timtchenko’s case, the initial search results indicate that there is a sanction that applies to him—a Ukraine-related sanction listed as program “UKRAINE-EO13661” in the OFAC database. | In Mr. Timtchenko’s case, the initial search results indicate that there is a sanction that applies to him—a Ukraine-related sanction listed as program “UKRAINE-EO13661” in the OFAC database. |
| 514737990870-ccea-4640-8153-0274c50c5f50 | Not Translated (0%) | Digging a bit deeper, you learn that the new customer is believed to have acted for, on behalf of, or has provided material or other support to, a senior official in the Russian government. | Digging a bit deeper, you learn that the new customer is believed to have acted for, on behalf of, or has provided material or other support to, a senior official in the Russian government. |
| 514837990870-ccea-4640-8153-0274c50c5f50 | Not Translated (0%) | Specifically, Mr. Timtchenko’s activities in the energy sector have been directly linked to Vladimir Putin. | Specifically, Mr. Timtchenko’s activities in the energy sector have been directly linked to Vladimir Putin. |
| 514937990870-ccea-4640-8153-0274c50c5f50 | Not Translated (0%) | Proceed to Steps 3 and 4. | Proceed to Steps 3 and 4. |
| 51508e67e8aa-82c9-4be6-8ac9-d28f95c954dc | Not Translated (0%) | Steps 3 and 4: | Steps 3 and 4: |
| 51518e67e8aa-82c9-4be6-8ac9-d28f95c954dc | Not Translated (0%) | Determine whether the sanctions restriction has been violated and, if so, how it occurred. | Determine whether the sanctions restriction has been violated and, if so, how it occurred. |
| 5152cfa9b9ca-b5ac-46e7-9fbc-764010230296 | Not Translated (0%) | Next, it is necessary to examine whether the applicable restriction has in fact been violated and, if so, how the violation occurred. | Next, it is necessary to examine whether the applicable restriction has in fact been violated and, if so, how the violation occurred. |
| 5153cfa9b9ca-b5ac-46e7-9fbc-764010230296 | Not Translated (0%) | The first task is to check to see whether (a) the customer already has other accounts with the organization, or (b) funds from the customer have already been received. | The first task is to check to see whether (a) the customer already has other accounts with the organization, or (b) funds from the customer have already been received. |
| 5154cfa9b9ca-b5ac-46e7-9fbc-764010230296 | Not Translated (0%) | If neither situation has occurred, it is unlikely a sanctions restriction has been violated—and the answer to Step 3 would be NO. | If neither situation has occurred, it is unlikely a sanctions restriction has been violated—and the answer to Step 3 would be NO. |
| 5155cfa9b9ca-b5ac-46e7-9fbc-764010230296 | Not Translated (0%) | If the answer to Step 3 is NO, it is not necessary to complete Step 4; because there is no transaction, there cannot have been a violation, and therefore there is no need to describe how a violation occurred. | If the answer to Step 3 is NO, it is not necessary to complete Step 4; because there is no transaction, there cannot have been a violation, and therefore there is no need to describe how a violation occurred. |
| 51568bdc799c-cdf0-4acb-ac26-a1a275e4a648 | Not Translated (0%) | Step 5: | Step 5: |
| 51578bdc799c-cdf0-4acb-ac26-a1a275e4a648 | Not Translated (0%) | Record and Document | Record and Document |
| 515813acd22e-a6d4-4117-8231-a1a6f5dfdb82 | Not Translated (0%) | Regardless of whether you find that a violation has occurred or not, it is necessary to wrap up every investigation by recording and documenting each step in your decision-making process. | Regardless of whether you find that a violation has occurred or not, it is necessary to wrap up every investigation by recording and documenting each step in your decision-making process. |
| 515913acd22e-a6d4-4117-8231-a1a6f5dfdb82 | Not Translated (0%) | It is then necessary to refer to your organization’s procedures for notifying unsuccessful applications made by sanctions targets or transactions they attempt to make. | It is then necessary to refer to your organization’s procedures for notifying unsuccessful applications made by sanctions targets or transactions they attempt to make. |
| 516013acd22e-a6d4-4117-8231-a1a6f5dfdb82 | Not Translated (0%) | It may also be necessary to check your country’s laws, or those of the applicable sanctions jurisdiction, to verify whether reporting findings to the regulator is necessary. | It may also be necessary to check your country’s laws, or those of the applicable sanctions jurisdiction, to verify whether reporting findings to the regulator is necessary. |
| 516113acd22e-a6d4-4117-8231-a1a6f5dfdb82 | Not Translated (0%) | For example, OFAC requires that all transactions rejected for sanction-related reasons be reported to them within ten business days. | For example, OFAC requires that all transactions rejected for sanction-related reasons be reported to them within ten business days. |
| 51623a938999-3641-4aa6-9eb0-3ec647856017 | Not Translated (0%) | MATCHES TO AN ENTITY’S NAME | MATCHES TO AN ENTITY’S NAME |
| 51634e60c8a1-a95b-4417-bb01-7483471a8dd1 | Not Translated (0%) | Another type of investigation you will need to conduct is of a name match to a legal entity, such as a business. | Another type of investigation you will need to conduct is of a name match to a legal entity, such as a business. |
| 51644e60c8a1-a95b-4417-bb01-7483471a8dd1 | Not Translated (0%) | In order to understand how to investigate a match to a legal entity, let’s work from an example. | In order to understand how to investigate a match to a legal entity, let’s work from an example. |
| 51654e60c8a1-a95b-4417-bb01-7483471a8dd1 | Not Translated (0%) | Imagine you are an investigator at a bank in the EU. | Imagine you are an investigator at a bank in the EU. |
| 51664e60c8a1-a95b-4417-bb01-7483471a8dd1 | Not Translated (0%) | The bank operates globally, and you’ve just received an alert from your AST about a possible name match relating to an existing customer, Alfa International Trading Company. | The bank operates globally, and you’ve just received an alert from your AST about a possible name match relating to an existing customer, Alfa International Trading Company. |
| 51674e60c8a1-a95b-4417-bb01-7483471a8dd1 | Not Translated (0%) | Your bank has completed the customer due diligence and sanctions due diligence on your customer, who has just been flagged as a possible match to “Alfa Investment and International Trading (ALFA).” | Your bank has completed the customer due diligence and sanctions due diligence on your customer, who has just been flagged as a possible match to “Alfa Investment and International Trading (ALFA).” |
| 5168571605c5-2dc5-4cd7-95fb-7fdd2cd9b141 | Not Translated (0%) | Now, begin the investigation guided by the decision tree described earlier. | Now, begin the investigation guided by the decision tree described earlier. |
| 5169571605c5-2dc5-4cd7-95fb-7fdd2cd9b141 | Not Translated (0%) | The first question to answer is, (1) Is the customer hitting against the UN, EU, OFAC or other relevant sanctions list? | The first question to answer is, (1) Is the customer hitting against the UN, EU, OFAC or other relevant sanctions list? |
| 5170571605c5-2dc5-4cd7-95fb-7fdd2cd9b141 | Not Translated (0%) | Confirm whether the customer is a sanctions target, and check <12499>all</12499> of the possible sanctions that might apply, since every list contains different information. | Confirm whether the customer is a sanctions target, and check <12499>all</12499> of the possible sanctions that might apply, since every list contains different information. |
| 5171571605c5-2dc5-4cd7-95fb-7fdd2cd9b141 | Not Translated (0%) | In checking the lists, you discover that the customer is hitting against both the EU and OFAC sanctions lists. | In checking the lists, you discover that the customer is hitting against both the EU and OFAC sanctions lists. |
| 5172571605c5-2dc5-4cd7-95fb-7fdd2cd9b141 | Not Translated (0%) | Therefore, the answer to this question is YES. | Therefore, the answer to this question is YES. |
| 5173571605c5-2dc5-4cd7-95fb-7fdd2cd9b141 | Not Translated (0%) | Continue to the next step in the decision tree. | Continue to the next step in the decision tree. |
| 517448433621-7a33-4cac-831a-28c76756e622 | Not Translated (0%) | The second question to answer in investigating this name match to a legal entity is, (2) Is the customer an individual, while the name on the sanctions lists are vessels, organizations, or companies (or vice versa)? | The second question to answer in investigating this name match to a legal entity is, (2) Is the customer an individual, while the name on the sanctions lists are vessels, organizations, or companies (or vice versa)? |
| 517548433621-7a33-4cac-831a-28c76756e622 | Not Translated (0%) | In this case, the customer is a legal entity, and so is the sanctions target, so the answer is NO. | In this case, the customer is a legal entity, and so is the sanctions target, so the answer is NO. |
| 517648433621-7a33-4cac-831a-28c76756e622 | Not Translated (0%) | Proceed to the next question. | Proceed to the next question. |
| 51772932a8b8-f949-4afb-a220-6462297d5249 | Not Translated (0%) | The next question in the decision tree is (3) Is only one of the names (i.e., only the given name OR the family name) a match? | The next question in the decision tree is (3) Is only one of the names (i.e., only the given name OR the family name) a match? |
| 51782932a8b8-f949-4afb-a220-6462297d5249 | Not Translated (0%) | Dig a little deeper into the details of the names involved to answer this question. | Dig a little deeper into the details of the names involved to answer this question. |
| 51792932a8b8-f949-4afb-a220-6462297d5249 | Not Translated (0%) | A number of word matches are found—Alfa, International and Trading are all exact matches, and other parts are very similar although not exact matches. | A number of word matches are found—Alfa, International and Trading are all exact matches, and other parts are very similar although not exact matches. |
| 51802932a8b8-f949-4afb-a220-6462297d5249 | Not Translated (0%) | Because there is more than a single matching word in the compared names, the answer to this question is NO. | Because there is more than a single matching word in the compared names, the answer to this question is NO. |
| 51812932a8b8-f949-4afb-a220-6462297d5249 | Not Translated (0%) | Proceed to the next step of the decision tree. | Proceed to the next step of the decision tree. |
| 518200a190ca-4066-4266-a3fe-3752056b7970 | Not Translated (0%) | Question 4 requires investigators to dig deeper still: | Question 4 requires investigators to dig deeper still: |
| 518300a190ca-4066-4266-a3fe-3752056b7970 | Not Translated (0%) | (4) Compare the complete entry with all of the information on the matching customer; are there a number of similarities or exact matches? | (4) Compare the complete entry with all of the information on the matching customer; are there a number of similarities or exact matches? |
| 518400a190ca-4066-4266-a3fe-3752056b7970 | Not Translated (0%) | Answering this question involves looking at all the identifiers. | Answering this question involves looking at all the identifiers. |
| 518500a190ca-4066-4266-a3fe-3752056b7970 | Not Translated (0%) | The first identifier to consider is jurisdiction. | The first identifier to consider is jurisdiction. |
| 518600a190ca-4066-4266-a3fe-3752056b7970 | Not Translated (0%) | Both listings (European Union and United States (OFAC)) indicate that ALFA is based in Amman, Jordan. | Both listings (European Union and United States (OFAC)) indicate that ALFA is based in Amman, Jordan. |
| 518700a190ca-4066-4266-a3fe-3752056b7970 | Not Translated (0%) | The customer is based in Dubai, in the United Arab Emirates (UAE), but also has offices (a branch or subsidiary) in Jordan. | The customer is based in Dubai, in the United Arab Emirates (UAE), but also has offices (a branch or subsidiary) in Jordan. |
| 518800a190ca-4066-4266-a3fe-3752056b7970 | Not Translated (0%) | This similarity is noted. | This similarity is noted. |
| 518900a190ca-4066-4266-a3fe-3752056b7970 | Not Translated (0%) | Next, examine the names of any associated individuals. | Next, examine the names of any associated individuals. |
| 519000a190ca-4066-4266-a3fe-3752056b7970 | Not Translated (0%) | Here, it is noted that the OFAC listing does not provide this information, but the EU list does, listing ALFA’s director: | Here, it is noted that the OFAC listing does not provide this information, but the EU list does, listing ALFA’s director: |
| 519100a190ca-4066-4266-a3fe-3752056b7970 | Not Translated (0%) | Nabil Victor Karam. | Nabil Victor Karam. |
| 519200a190ca-4066-4266-a3fe-3752056b7970 | Not Translated (0%) | The customer’s general manager is a Mr. Ali Mohsen, from the UAE. | The customer’s general manager is a Mr. Ali Mohsen, from the UAE. |
| 5193aab83a93-b078-41a4-80a7-e09a557967bc | Not Translated (0%) | Now, considering everything discovered in the investigation thus far and the SDD in the customer file, we want to understand why this pre-existing customer is only now alerting. | Now, considering everything discovered in the investigation thus far and the SDD in the customer file, we want to understand why this pre-existing customer is only now alerting. |
| 5194aab83a93-b078-41a4-80a7-e09a557967bc | Not Translated (0%) | Was the sanctioned target just recently added? | Was the sanctioned target just recently added? |
| 5195aab83a93-b078-41a4-80a7-e09a557967bc | Not Translated (0%) | Based on this example, the SDD on file did not allow us to compare whether Nabil Victor Karam is a director of our customer as we only have information on the general manager. | Based on this example, the SDD on file did not allow us to compare whether Nabil Victor Karam is a director of our customer as we only have information on the general manager. |
| 5196aab83a93-b078-41a4-80a7-e09a557967bc | Not Translated (0%) | This information does not allow us to make any additional conclusions. | This information does not allow us to make any additional conclusions. |
| 5197aab83a93-b078-41a4-80a7-e09a557967bc | Not Translated (0%) | We want to conclude whether this is a target match or false positive, but given the similarities between the customer and the sanctioned target and also because this is an existing customer, the investigator will want to request more information to make a final conclusion. | We want to conclude whether this is a target match or false positive, but given the similarities between the customer and the sanctioned target and also because this is an existing customer, the investigator will want to request more information to make a final conclusion. |
| 5198aab83a93-b078-41a4-80a7-e09a557967bc | Not Translated (0%) | This may entail an event-triggered review where SDD is reviewed and updated in order to better analyze the similarities. | This may entail an event-triggered review where SDD is reviewed and updated in order to better analyze the similarities. |
| 5199aab83a93-b078-41a4-80a7-e09a557967bc | Not Translated (0%) | In the meantime, the risk that the customer is a sanctioned target is present and needs to be mitigated. | In the meantime, the risk that the customer is a sanctioned target is present and needs to be mitigated. |
| 5200aab83a93-b078-41a4-80a7-e09a557967bc | Not Translated (0%) | The investigator should coordinate with other departments to put a hold on the customer’s accounts to prevent processing any future transactions without additional oversight and control while the investigation is pending. | The investigator should coordinate with other departments to put a hold on the customer’s accounts to prevent processing any future transactions without additional oversight and control while the investigation is pending. |
| 52016694ab18-00a1-437d-ad53-faeb25546063 | Not Translated (0%) | MATCHES TO JURISDICTION AND NATURE OF BUSINESS | MATCHES TO JURISDICTION AND NATURE OF BUSINESS |
| 5202cd24ff36-cf6a-49d0-b674-91f6c2ec4108 | Not Translated (0%) | We’ve considered matches to names and matches to legal entities; now let’s consider matches to jurisdiction and nature of business. | We’ve considered matches to names and matches to legal entities; now let’s consider matches to jurisdiction and nature of business. |
| 5203cd24ff36-cf6a-49d0-b674-91f6c2ec4108 | Not Translated (0%) | In the position of a relationship manager, imagine that during a routine review for ongoing monitoring you discover that the risk profile for an existing customer describes her as a “consultant to foreign governments and officials, including those of Libya.” | In the position of a relationship manager, imagine that during a routine review for ongoing monitoring you discover that the risk profile for an existing customer describes her as a “consultant to foreign governments and officials, including those of Libya.” |
| 5204cd24ff36-cf6a-49d0-b674-91f6c2ec4108 | Not Translated (0%) | Unlike investigations into name matches or entity matches, investigations into matches of jurisdiction or nature of business focus on connections rather than names. | Unlike investigations into name matches or entity matches, investigations into matches of jurisdiction or nature of business focus on connections rather than names. |
| 5205cd24ff36-cf6a-49d0-b674-91f6c2ec4108 | Not Translated (0%) | In this case, the customer has a connection to Libya (a jurisdiction). | In this case, the customer has a connection to Libya (a jurisdiction). |
| 5206cd24ff36-cf6a-49d0-b674-91f6c2ec4108 | Not Translated (0%) | To learn more, we need to begin the five-step investigation of this case. | To learn more, we need to begin the five-step investigation of this case. |
| 5207cd24ff36-cf6a-49d0-b674-91f6c2ec4108 | Not Translated (0%) | Let’s take each of the five questions in turn: | Let’s take each of the five questions in turn: |
| 5208e83edb1b-d06b-4a67-8c61-b5f9c6f17b86 | Not Translated (0%) | Is there an applicable sanctions restriction? | Is there an applicable sanctions restriction? |
| 520973382723-9ae8-43a1-9428-cf6e3410840b | Not Translated (0%) | YES. | YES. |
| 521073382723-9ae8-43a1-9428-cf6e3410840b | Not Translated (0%) | There are UN, EU, and US restrictions against Muammar Gaddafi’s family and close associates. | There are UN, EU, and US restrictions against Muammar Gaddafi’s family and close associates. |
| 52118faa4303-3714-4239-b277-089b2f5d17e4 | Not Translated (0%) | What is this sanctions restriction about? | What is this sanctions restriction about? |
| 5212748394cf-8475-43af-8c85-3fb8804c7e9a | Not Translated (0%) | It concerns freezing assets, not dealing in funds of sanctions targets, and the restrictions related to the oil sector in Libya. | It concerns freezing assets, not dealing in funds of sanctions targets, and the restrictions related to the oil sector in Libya. |
| 52130433a9b2-8499-47ed-b05c-161460520d6c | Not Translated (0%) | Has this sanctions restriction been violated? | Has this sanctions restriction been violated? |
| 5214de1036c8-29ce-44fa-ad3d-1872a93ea4aa | Not Translated (0%) | Answering this question requires more information. | Answering this question requires more information. |
| 5215de1036c8-29ce-44fa-ad3d-1872a93ea4aa | Not Translated (0%) | For example, it is necessary to ask: | For example, it is necessary to ask: |
| 521691a107ce-4509-4b95-8bae-b025509a7770 | Not Translated (0%) | Who are the customer’s clients, and are they sanctions targets themselves? | Who are the customer’s clients, and are they sanctions targets themselves? |
| 521766a93f9b-d7ec-4561-b09e-a4fe00384c30 | Not Translated (0%) | What payments have been received? | What payments have been received? |
| 521866a93f9b-d7ec-4561-b09e-a4fe00384c30 | Not Translated (0%) | Is the payer a sanctions target? | Is the payer a sanctions target? |
| 5219bc05c0c0-e11e-402b-9984-4caf5bf830aa | Not Translated (0%) | Does the customer’s consulting involve the oil sector? | Does the customer’s consulting involve the oil sector? |
| 52206a10a189-b386-4f18-aa94-1ed154bd5a3d | Not Translated (0%) | Who are the customer’s associates and/or business partners? | Who are the customer’s associates and/or business partners? |
| 5221acfa2467-c072-4382-b79b-1593907bc70e | Not Translated (0%) | Is there any additional information that could deepen our understanding of the possible connection between the customer and the sanctions restrictions? | Is there any additional information that could deepen our understanding of the possible connection between the customer and the sanctions restrictions? |
| 52226444a1c1-d6c3-41cd-abf0-a51126de40c5 | Not Translated (0%) | If a sanctions violation occurred, how did it happen? | If a sanctions violation occurred, how did it happen? |
| 522383bd9997-6781-4e91-a2ba-1c211c750ed8 | Not Translated (0%) | It’s not enough to simply decide YES or NO here; you’ll need to explain everything you have discovered about how the sanctions violation happened. | It’s not enough to simply decide YES or NO here; you’ll need to explain everything you have discovered about how the sanctions violation happened. |
| 52247b50d564-4c4b-47f0-b63b-93ca31f4b497 | Not Translated (0%) | Finally, record and document the entire investigation. | Finally, record and document the entire investigation. |
| 52253470a1e3-92b4-449a-a917-7d98c29118c9 | Not Translated (0%) | Do this while the investigation is fresh in your mind, so you have a detailed and useful report ready to use for future reference into this or a related case. | Do this while the investigation is fresh in your mind, so you have a detailed and useful report ready to use for future reference into this or a related case. |
| 52268ed0ad30-21b7-4480-91e4-cbbd635327f8 | Not Translated (0%) | In this case, an additional investigation will be conducted by a specialized team or unit of your institution. | In this case, an additional investigation will be conducted by a specialized team or unit of your institution. |
| 52278ed0ad30-21b7-4480-91e4-cbbd635327f8 | Not Translated (0%) | Further investigation should include the customer’s transactional history and due diligence conducted on counterparties. | Further investigation should include the customer’s transactional history and due diligence conducted on counterparties. |
| 52288ed0ad30-21b7-4480-91e4-cbbd635327f8 | Not Translated (0%) | The Libyan sanctions are tailored to particular persons and the oil sector. | The Libyan sanctions are tailored to particular persons and the oil sector. |
| 52298ed0ad30-21b7-4480-91e4-cbbd635327f8 | Not Translated (0%) | If investigation finds no connections to the Gaddafi family and nexus, and the counterparties and business are not engaged in the oil sector, then there is sufficient evidence to determine that this customer’s activity is permissible and no reportable transactions are involved (i.e., no sanctions violations). | If investigation finds no connections to the Gaddafi family and nexus, and the counterparties and business are not engaged in the oil sector, then there is sufficient evidence to determine that this customer’s activity is permissible and no reportable transactions are involved (i.e., no sanctions violations). |
| 52308ed0ad30-21b7-4480-91e4-cbbd635327f8 | Not Translated (0%) | However, based on this investigation, a firm may wish to place this customer under additional scrutiny and monitoring, for example, by reviewing Libya-related transactions on a monthly basis to ensure the activity remains reasonable and permissible. | However, based on this investigation, a firm may wish to place this customer under additional scrutiny and monitoring, for example, by reviewing Libya-related transactions on a monthly basis to ensure the activity remains reasonable and permissible. |
| 52318ed0ad30-21b7-4480-91e4-cbbd635327f8 | Not Translated (0%) | Alternatively, if due diligence determines that transactions have occurred related to the Gaddafis or with the oil industry, the investigation should continue until it is determined whether a sanctions violation has occurred. | Alternatively, if due diligence determines that transactions have occurred related to the Gaddafis or with the oil industry, the investigation should continue until it is determined whether a sanctions violation has occurred. |
| 52328ed0ad30-21b7-4480-91e4-cbbd635327f8 | Not Translated (0%) | If one has, then (1) the investigator may recommend that a hold be placed on the customer’s account to prevent any future sanctions violations until additional measures can be applied (including possibly closing the account), and (2) the investigator should follow internal policy and procedures for escalating the activity for a voluntary disclosure (if this is after the fact) or for block/reject if the transaction is in process, but not released. | If one has, then (1) the investigator may recommend that a hold be placed on the customer’s account to prevent any future sanctions violations until additional measures can be applied (including possibly closing the account), and (2) the investigator should follow internal policy and procedures for escalating the activity for a voluntary disclosure (if this is after the fact) or for block/reject if the transaction is in process, but not released. |
| 52338ed0ad30-21b7-4480-91e4-cbbd635327f8 | Not Translated (0%) | Based on the results of this investigation and review by a supervisor, a suspicious transaction report (STR), also known as a suspicious activity report (SAR), might be filed. | Based on the results of this investigation and review by a supervisor, a suspicious transaction report (STR), also known as a suspicious activity report (SAR), might be filed. |
| 5234457d5cf0-fc36-447c-a505-0f6c080169fb | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 5235457d5cf0-fc36-447c-a505-0f6c080169fb | Not Translated (0%) | U.S. BANK NATIONAL ASSOCIATION, 2018 | U.S. BANK NATIONAL ASSOCIATION, 2018 |
| 52366661c567-7425-4b43-b310-6589f44b9ce3 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 523773645b9d-4a38-40e4-9c3e-7c97cb1762fe | Not Translated (0%) | Now, let’s look at a different case example from 2018 involving the U.S. Bank National Association (U.S. Bank). | Now, let’s look at a different case example from 2018 involving the U.S. Bank National Association (U.S. Bank). |
| 523873645b9d-4a38-40e4-9c3e-7c97cb1762fe | Not Translated (0%) | In February 2018, the US Financial Crimes Enforcement Network (FinCEN) found that U.S. Bank was risk-rating its customers using incomplete information. | In February 2018, the US Financial Crimes Enforcement Network (FinCEN) found that U.S. Bank was risk-rating its customers using incomplete information. |
| 523973645b9d-4a38-40e4-9c3e-7c97cb1762fe | Not Translated (0%) | Specifically, U.S. Bank failed to collect citizenship and occupation information about some of its customers. | Specifically, U.S. Bank failed to collect citizenship and occupation information about some of its customers. |
| 524073645b9d-4a38-40e4-9c3e-7c97cb1762fe | Not Translated (0%) | This resulted in some high-risk customers essentially “falling through the cracks” and avoiding the enhanced monitoring they should have received. | This resulted in some high-risk customers essentially “falling through the cracks” and avoiding the enhanced monitoring they should have received. |
| 524173645b9d-4a38-40e4-9c3e-7c97cb1762fe | Not Translated (0%) | Further investigation revealed that U.S. Bank had missed no fewer than 136 suspicious examples related to high-risk customers or transactions. | Further investigation revealed that U.S. Bank had missed no fewer than 136 suspicious examples related to high-risk customers or transactions. |
| 52422657345f-85bc-4b9e-b859-ee5e89b89420 | Not Translated (0%) | KEY TAKEAWAYS: | KEY TAKEAWAYS: |
| 5243066d8650-be3c-4349-879b-dc015bd4bd3c | Not Translated (0%) | U.S. Bank failed to (universally) collect the citizenship information that is a key identifier for jurisdiction or geographic connections, as well as the occupational information that is a key identifier for the nature of a customer’s business. | U.S. Bank failed to (universally) collect the citizenship information that is a key identifier for jurisdiction or geographic connections, as well as the occupational information that is a key identifier for the nature of a customer’s business. |
| 524414f39616-9e92-4edf-9739-6172a6adb063 | Not Translated (0%) | Without these data points, U.S. Bank couldn’t consistently and accurately identify sanctions risks among its customers. | Without these data points, U.S. Bank couldn’t consistently and accurately identify sanctions risks among its customers. |
| 524532d04de8-7b7e-46b9-8be3-e0ed023f078a | Not Translated (0%) | MATCHES IN TRANSACTIONS (NAME OR NATURE OF ACTIVITY) | MATCHES IN TRANSACTIONS (NAME OR NATURE OF ACTIVITY) |
| 52465bac8d2e-2a54-45df-bf46-11c0fb55f6b0 | Not Translated (0%) | Another type of investigation you might conduct occurs when you receive an alert to a possible match in transactions. | Another type of investigation you might conduct occurs when you receive an alert to a possible match in transactions. |
| 52475bac8d2e-2a54-45df-bf46-11c0fb55f6b0 | Not Translated (0%) | These matches can either be to the name or nature of an activity, or to a transaction involving the assets or funds belonging to a sanctions target. | These matches can either be to the name or nature of an activity, or to a transaction involving the assets or funds belonging to a sanctions target. |
| 524883d54cf0-0dd2-47a7-b9b2-b44791ba860e | Not Translated (0%) | As with the previous types of matches investigated, an effective investigation into a transaction depends on the data you hold about the customer(s) involved. | As with the previous types of matches investigated, an effective investigation into a transaction depends on the data you hold about the customer(s) involved. |
| 524983d54cf0-0dd2-47a7-b9b2-b44791ba860e | Not Translated (0%) | When the screening tool alerts you to missing information in a transaction message or a pattern suggesting suspicious activity, you won’t be able to attribute this to a specific customer if you don’t have complete information on all customers. | When the screening tool alerts you to missing information in a transaction message or a pattern suggesting suspicious activity, you won’t be able to attribute this to a specific customer if you don’t have complete information on all customers. |
| 525083d54cf0-0dd2-47a7-b9b2-b44791ba860e | Not Translated (0%) | To understand this relationship between transactions and the simplified due diligence you hold on your customers, look at the case of Deutsche Bank and a series of “mirror trades.” | To understand this relationship between transactions and the simplified due diligence you hold on your customers, look at the case of Deutsche Bank and a series of “mirror trades.” |
| 525127ca426d-425a-451a-a152-0835bf6facc5 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 525227ca426d-425a-451a-a152-0835bf6facc5 | Not Translated (0%) | DEUTSCHE BANK “MIRROR TRADES,” 2017 | DEUTSCHE BANK “MIRROR TRADES,” 2017 |
| 525324c63de9-a856-4733-8a2b-65084a300f55 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 5254f5a118a1-3601-41b2-a747-eb6fd2bfada9 | Not Translated (0%) | In January 2017, the UK Financial Conduct Authority (FCA) discovered that Deutsche Bank had processed a number of suspicious transactions called “mirror trades.” | In January 2017, the UK Financial Conduct Authority (FCA) discovered that Deutsche Bank had processed a number of suspicious transactions called “mirror trades.” |
| 5255f5a118a1-3601-41b2-a747-eb6fd2bfada9 | Not Translated (0%) | These trades served as a way of moving funds (rubles) out of Russia and into other jurisdictions and currencies (generally pounds sterling or US dollars), possibly as part of a money-laundering scheme. | These trades served as a way of moving funds (rubles) out of Russia and into other jurisdictions and currencies (generally pounds sterling or US dollars), possibly as part of a money-laundering scheme. |
| 5256f5a118a1-3601-41b2-a747-eb6fd2bfada9 | Not Translated (0%) | The total outflow of funds from Russia was estimated to be $10 billion over four years. | The total outflow of funds from Russia was estimated to be $10 billion over four years. |
| 5257f5a118a1-3601-41b2-a747-eb6fd2bfada9 | Not Translated (0%) | The bank operated in “silos,” with each unit conducting its own due diligence but not consolidating the information gathered at the global level. | The bank operated in “silos,” with each unit conducting its own due diligence but not consolidating the information gathered at the global level. |
| 5258f5a118a1-3601-41b2-a747-eb6fd2bfada9 | Not Translated (0%) | Because of inadequate Know Your Customer (KYC) held on its corporate customers and this lack of global supervision, Deutsche Bank processed suspicious trades without identifying the transactions as such. | Because of inadequate Know Your Customer (KYC) held on its corporate customers and this lack of global supervision, Deutsche Bank processed suspicious trades without identifying the transactions as such. |
| 5259f5a118a1-3601-41b2-a747-eb6fd2bfada9 | Not Translated (0%) | Specifically, Deutsche Bank failed in several ways: | Specifically, Deutsche Bank failed in several ways: |
| 5260f5a118a1-3601-41b2-a747-eb6fd2bfada9 | Not Translated (0%) | (1) it did not reliably document ownership structures of its corporate customers, (2) it did not collect and verify passport copies, (3) it did not collect information on the nature and purpose of customer business and sources of funds, and (4) the KYC/enhanced due diligence (EDD) information was not circulated among different units of the bank and there was a lack of overall global supervision. | (1) it did not reliably document ownership structures of its corporate customers, (2) it did not collect and verify passport copies, (3) it did not collect information on the nature and purpose of customer business and sources of funds, and (4) the KYC/enhanced due diligence (EDD) information was not circulated among different units of the bank and there was a lack of overall global supervision. |
| 5261f5a118a1-3601-41b2-a747-eb6fd2bfada9 | Not Translated (0%) | These failures—which some say were due to staffing shortages in the compliance department, and others say were due to greed (for commissions in a flagging market)—meant that connections to suspicious customers went undetected. | These failures—which some say were due to staffing shortages in the compliance department, and others say were due to greed (for commissions in a flagging market)—meant that connections to suspicious customers went undetected. |
| 5262f5a118a1-3601-41b2-a747-eb6fd2bfada9 | Not Translated (0%) | In all, investigators identified 2,400 suspicious trades processed by the bank. | In all, investigators identified 2,400 suspicious trades processed by the bank. |
| 5263f5a118a1-3601-41b2-a747-eb6fd2bfada9 | Not Translated (0%) | The lack of sufficient data held on customers resulted in a situation in which sanctions targets could make transactions without being investigated, or even flagged, by Deutsche Bank. | The lack of sufficient data held on customers resulted in a situation in which sanctions targets could make transactions without being investigated, or even flagged, by Deutsche Bank. |
| 5264f5a118a1-3601-41b2-a747-eb6fd2bfada9 | Not Translated (0%) | Deutsche Bank was fined $630 million by US and UK regulators as a result. | Deutsche Bank was fined $630 million by US and UK regulators as a result. |
| 5265f7904f7e-0814-43bd-bf09-83e4af386222 | Not Translated (0%) | Here’s how the mirror trades were made. | Here’s how the mirror trades were made. |
| 5266f7904f7e-0814-43bd-bf09-83e4af386222 | Not Translated (0%) | First, a Russian customer of Deutsche Bank Moscow bought Russian securities from Deutsche Bank Moscow, paying in rubles (the “Moscow side”). | First, a Russian customer of Deutsche Bank Moscow bought Russian securities from Deutsche Bank Moscow, paying in rubles (the “Moscow side”). |
| 5267f7904f7e-0814-43bd-bf09-83e4af386222 | Not Translated (0%) | At the same time, a non-Russian customer of Deutsche Bank sold the same number of the same securities to Deutsche Bank in exchange for US dollars (the “London side”). | At the same time, a non-Russian customer of Deutsche Bank sold the same number of the same securities to Deutsche Bank in exchange for US dollars (the “London side”). |
| 5268f7904f7e-0814-43bd-bf09-83e4af386222 | Not Translated (0%) | As a result of its poor KYC, Deutsche Bank did not know that the customers on the Moscow side and those on the London side were connected to each other through common directors, owners, employees, or addresses. | As a result of its poor KYC, Deutsche Bank did not know that the customers on the Moscow side and those on the London side were connected to each other through common directors, owners, employees, or addresses. |
| 5269f7904f7e-0814-43bd-bf09-83e4af386222 | Not Translated (0%) | In fact, Deutsche Bank repeatedly failed to make this connection even after multiple industry experts shared their concerns with Deutsche Bank about possible connections between their London-side and Moscow-side customers, and after transactions were escalated for investigation. | In fact, Deutsche Bank repeatedly failed to make this connection even after multiple industry experts shared their concerns with Deutsche Bank about possible connections between their London-side and Moscow-side customers, and after transactions were escalated for investigation. |
| 5270a62d55f0-1de2-4c50-9743-a722f2edca88 | Not Translated (0%) | KEY TAKEAWAYS: | KEY TAKEAWAYS: |
| 5271d5c0e6a3-2b1a-49d5-b8ec-5cb0a3a865f7 | Not Translated (0%) | Deutsche Bank’s lack of complete information about its customers and their connections created a trading environment in which it was entirely possible that transactions were conducted by or on behalf of known sanctions targets. | Deutsche Bank’s lack of complete information about its customers and their connections created a trading environment in which it was entirely possible that transactions were conducted by or on behalf of known sanctions targets. |
| 5272c55dfbd4-4535-4463-a9eb-1234a0d536ee | Not Translated (0%) | The second type of transaction match involves identifying any assets, funds, and economic resources belonging to a sanctions target once you have established a match between assets and a customer or third party. | The second type of transaction match involves identifying any assets, funds, and economic resources belonging to a sanctions target once you have established a match between assets and a customer or third party. |
| 5273c55dfbd4-4535-4463-a9eb-1234a0d536ee | Not Translated (0%) | The definition of “assets, funds, and economic resources” is intentionally broad. | The definition of “assets, funds, and economic resources” is intentionally broad. |
| 5274c55dfbd4-4535-4463-a9eb-1234a0d536ee | Not Translated (0%) | It includes funds in checking and savings accounts, cash, physical property, and various financial instruments such as securities, bonds, money orders, notes, letters of credit, dividends, and so on. | It includes funds in checking and savings accounts, cash, physical property, and various financial instruments such as securities, bonds, money orders, notes, letters of credit, dividends, and so on. |
| 5275c55dfbd4-4535-4463-a9eb-1234a0d536ee | Not Translated (0%) | These definitions are generally shared by the UN, EU, and national authorities around the world. | These definitions are generally shared by the UN, EU, and national authorities around the world. |
| 52761eadbb66-2057-469a-83c7-0a7763b51835 | Not Translated (0%) | In order to identify an asset match in a transaction, the institution must hold thorough, accurate, and verified information about what each customer owns as far as assets are concerned. | In order to identify an asset match in a transaction, the institution must hold thorough, accurate, and verified information about what each customer owns as far as assets are concerned. |
| 52771eadbb66-2057-469a-83c7-0a7763b51835 | Not Translated (0%) | To be accurate, and to the fullest extent possible, this should include all assets for which the sanctions target is the beneficial owner. | To be accurate, and to the fullest extent possible, this should include all assets for which the sanctions target is the beneficial owner. |
| 52781eadbb66-2057-469a-83c7-0a7763b51835 | Not Translated (0%) | This can be a difficult process because a sanctions target will generally try to hide or disguise some assets. | This can be a difficult process because a sanctions target will generally try to hide or disguise some assets. |
| 52791eadbb66-2057-469a-83c7-0a7763b51835 | Not Translated (0%) | In many cases, assets could be indirectly owned by a chain of entities; for instance, a seagoing vessel could be owned by a navigation company that is controlled by one or several holding companies. | In many cases, assets could be indirectly owned by a chain of entities; for instance, a seagoing vessel could be owned by a navigation company that is controlled by one or several holding companies. |
| 52801eadbb66-2057-469a-83c7-0a7763b51835 | Not Translated (0%) | Some assets, such as real estate properties, could be purchased by a blend of legal and illegal funds (“structuring” and “mingling” in anti-money laundering [AML] language). | Some assets, such as real estate properties, could be purchased by a blend of legal and illegal funds (“structuring” and “mingling” in anti-money laundering [AML] language). |
| 52811eadbb66-2057-469a-83c7-0a7763b51835 | Not Translated (0%) | Assets could also be registered under the name of third parties. | Assets could also be registered under the name of third parties. |
| 52821eadbb66-2057-469a-83c7-0a7763b51835 | Not Translated (0%) | Any and all of these complicating factors can make the process of matching assets challenging. | Any and all of these complicating factors can make the process of matching assets challenging. |
| 5283edf99f37-ddbe-46b2-b5eb-7583ba6a16c3 | Not Translated (0%) | The institution must have effective controls in place for freezing these assets in a timely and comprehensive manner. | The institution must have effective controls in place for freezing these assets in a timely and comprehensive manner. |
| 5284edf99f37-ddbe-46b2-b5eb-7583ba6a16c3 | Not Translated (0%) | Institutions also need to have a clear and complete understanding of the target’s “footprint” across the organization: | Institutions also need to have a clear and complete understanding of the target’s “footprint” across the organization: |
| 5285edf99f37-ddbe-46b2-b5eb-7583ba6a16c3 | Not Translated (0%) | In which of the branches or locations does the target hold assets, and in which lines of business? | In which of the branches or locations does the target hold assets, and in which lines of business? |
| 52862bb491a5-503b-46ce-aa4b-71ec16781d44 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 52872bb491a5-503b-46ce-aa4b-71ec16781d44 | Not Translated (0%) | DANSKE BANK, 2018 | DANSKE BANK, 2018 |
| 52883c642655-c0dd-448e-895a-98903fded378 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 528955553f70-2a08-48e0-b627-d7c96268a814 | Not Translated (0%) | In 2007, Danske Bank, one of the major Scandinavian banks, acquired Sampo Bank in Estonia and converted it into a branch, but failed to integrate its compliance units. | In 2007, Danske Bank, one of the major Scandinavian banks, acquired Sampo Bank in Estonia and converted it into a branch, but failed to integrate its compliance units. |
| 529055553f70-2a08-48e0-b627-d7c96268a814 | Not Translated (0%) | Compliance officers in the bank’s head office were thus unable to assess the global footprint of many customers who in fact were linked to Russian oligarchs subject to sanctions. | Compliance officers in the bank’s head office were thus unable to assess the global footprint of many customers who in fact were linked to Russian oligarchs subject to sanctions. |
| 529155553f70-2a08-48e0-b627-d7c96268a814 | Not Translated (0%) | It is estimated that more than €200 billion ($237 billion) from 2007 to 2015 were illegally transferred. | It is estimated that more than €200 billion ($237 billion) from 2007 to 2015 were illegally transferred. |
| 529255553f70-2a08-48e0-b627-d7c96268a814 | Not Translated (0%) | The main conduit for these transfers was the Estonian branch “non-resident portfolio,” comprising about 10,000 accounts. | The main conduit for these transfers was the Estonian branch “non-resident portfolio,” comprising about 10,000 accounts. |
| 529355553f70-2a08-48e0-b627-d7c96268a814 | Not Translated (0%) | Investigators have examined 6,200 accounts and deem “the vast majority” to be suspicious. | Investigators have examined 6,200 accounts and deem “the vast majority” to be suspicious. |
| 52946bf0c232-8ec3-427a-842d-b5e353441779 | Not Translated (0%) | By contrast, the branch had reported only 760 clients to the Financial Intelligence Unit, the Estonian police division dealing with financial crime. | By contrast, the branch had reported only 760 clients to the Financial Intelligence Unit, the Estonian police division dealing with financial crime. |
| 52956bf0c232-8ec3-427a-842d-b5e353441779 | Not Translated (0%) | The investigators have identified 177 customers—mostly partnerships registered in Britain or well-known tax havens—potentially involved in the “Russian Laundromat,” a vast fraud exposed by a group of investigative journalists known as the Organized Crime and Corruption Reporting Project (OCCRP) | The investigators have identified 177 customers—mostly partnerships registered in Britain or well-known tax havens—potentially involved in the “Russian Laundromat,” a vast fraud exposed by a group of investigative journalists known as the Organized Crime and Corruption Reporting Project (OCCRP) |
| 5296d97fdcc3-f945-4dad-8081-6459dbce88fc | Not Translated (0%) | In preliminary criminal charges filed on November 28, 2018, Danish prosecutors accused Danske of failing to report suspicious transactions, not training staff in anti-money laundering procedures and having no senior manager responsible for compliance. | In preliminary criminal charges filed on November 28, 2018, Danish prosecutors accused Danske of failing to report suspicious transactions, not training staff in anti-money laundering procedures and having no senior manager responsible for compliance. |
| 5297d97fdcc3-f945-4dad-8081-6459dbce88fc | Not Translated (0%) | At least eight other banks handled some suspicious money in related transactions, among them three correspondent banks that linked the Estonian branch to America’s financial system: | At least eight other banks handled some suspicious money in related transactions, among them three correspondent banks that linked the Estonian branch to America’s financial system: |
| 5298d97fdcc3-f945-4dad-8081-6459dbce88fc | Not Translated (0%) | Deutsche Bank, Bank of America, and JPMorgan Chase & Co. The CEO of Dankse had to resign on October 1, 2018 and may face criminal charges. | Deutsche Bank, Bank of America, and JPMorgan Chase & Co. The CEO of Dankse had to resign on October 1, 2018 and may face criminal charges. |
| 5299d97fdcc3-f945-4dad-8081-6459dbce88fc | Not Translated (0%) | Several inquiries by regulators were made in Europe and the United States. | Several inquiries by regulators were made in Europe and the United States. |
| 5300c5d4e0f7-0709-4ca3-b2d6-c27fe34328e3 | Not Translated (0%) | KEY TAKEAWAYS: | KEY TAKEAWAYS: |
| 53011c41dedd-6130-4566-867f-4bb6e2ba05d0 | Not Translated (0%) | The problems that surfaced at Danske Bank in 2018 provide a clear example of lack of client identification. | The problems that surfaced at Danske Bank in 2018 provide a clear example of lack of client identification. |
| 53021c41dedd-6130-4566-867f-4bb6e2ba05d0 | Not Translated (0%) | There are at least two lessons to be learned: | There are at least two lessons to be learned: |
| 53038c827209-eebb-47c3-bab8-2140b6ed8ef1 | Not Translated (0%) | If your institution acquires an entity, especially in a different jurisdiction, you should make sure there is thorough due diligence on all customers of the acquired entity at the time of the acquisition; this may require a new “onboarding” of these customers. | If your institution acquires an entity, especially in a different jurisdiction, you should make sure there is thorough due diligence on all customers of the acquired entity at the time of the acquisition; this may require a new “onboarding” of these customers. |
| 5304d257bf78-cff5-4079-930a-91407a7807b2 | Not Translated (0%) | If you work for a large organization, such as a “global” bank, you should make sure the systems and procedures of all entities in the group are integrated and harmonized so that you can have a consolidated view of each customer’s activities. | If you work for a large organization, such as a “global” bank, you should make sure the systems and procedures of all entities in the group are integrated and harmonized so that you can have a consolidated view of each customer’s activities. |
| 5305d73fa6a0-0fc6-47c4-9ae4-505e3bbea85d | Not Translated (0%) | Reviewing Relevant Sources of Information | Reviewing Relevant Sources of Information |
| 5306d974e2d3-f0a8-4d99-a32f-3c2ff908a2ad | Not Translated (0%) | Collecting and recording relevant, detailed, accurate, and thorough information about all customers and every transaction forms the foundation of any effective investigation or review. | Collecting and recording relevant, detailed, accurate, and thorough information about all customers and every transaction forms the foundation of any effective investigation or review. |
| 5307d974e2d3-f0a8-4d99-a32f-3c2ff908a2ad | Not Translated (0%) | Without good data, suspicious activity cannot be flagged, and without being flagged, it will not be investigated. | Without good data, suspicious activity cannot be flagged, and without being flagged, it will not be investigated. |
| 53087bcc45c0-2945-41a6-a194-e7d16ebbf813 | Not Translated (0%) | So, where and how do you search for good data and information pertinent to an investigation? | So, where and how do you search for good data and information pertinent to an investigation? |
| 5309f2108fad-16b0-43c2-a13d-1521afe5c575 | Not Translated (0%) | Successful investigators rely on common, trusted search tools and techniques, and focus on the three key risk areas for sanctions due diligence—specifically, the customers’ identity, the nature of the business, and any jurisdiction/geographic connections. | Successful investigators rely on common, trusted search tools and techniques, and focus on the three key risk areas for sanctions due diligence—specifically, the customers’ identity, the nature of the business, and any jurisdiction/geographic connections. |
| 5310f2108fad-16b0-43c2-a13d-1521afe5c575 | Not Translated (0%) | What information to look for, and where to look for it, are the topics of the following sections. | What information to look for, and where to look for it, are the topics of the following sections. |
| 5311330b7ab3-0f77-4170-b512-f5f8dc9e8213 | Not Translated (0%) | Primary Sources of Information | Primary Sources of Information |
| 5312a89e7c7d-8782-4eab-b14f-6032b083969f | Not Translated (0%) | Sources of information can be divided into two broad categories: primary sources and secondary sources. | Sources of information can be divided into two broad categories: primary sources and secondary sources. |
| 5313a89e7c7d-8782-4eab-b14f-6032b083969f | Not Translated (0%) | We’ll examine primary sources of information first. | We’ll examine primary sources of information first. |
| 5314a4e876cf-f2ca-4919-ab40-011166055e1b | Not Translated (0%) | Primary sources of information provide direct evidence about sanctions or sanctions targets. | Primary sources of information provide direct evidence about sanctions or sanctions targets. |
| 5315a4e876cf-f2ca-4919-ab40-011166055e1b | Not Translated (0%) | Sanctions instruments and official sanctions lists published by government bodies and their regulators represent a critical type of primary sources of information. | Sanctions instruments and official sanctions lists published by government bodies and their regulators represent a critical type of primary sources of information. |
| 5316a4e876cf-f2ca-4919-ab40-011166055e1b | Not Translated (0%) | These key primary sources encompass various types of documents, including key legal documents, key sanctions lists, key trade activity lists, and transaction activity. | These key primary sources encompass various types of documents, including key legal documents, key sanctions lists, key trade activity lists, and transaction activity. |
| 531785e194b5-1d21-48f6-916e-8137dd558cd9 | Not Translated (0%) | KEY LEGAL DOCUMENTS | KEY LEGAL DOCUMENTS |
| 5318eef27402-ff51-4f3a-93f6-468c72328620 | Not Translated (0%) | The following documents are a selected sampling of the legal documents available, as each jurisdiction issues its own rules and regulations and determines the scope of enforcement. | The following documents are a selected sampling of the legal documents available, as each jurisdiction issues its own rules and regulations and determines the scope of enforcement. |
| 5319eef27402-ff51-4f3a-93f6-468c72328620 | Not Translated (0%) | These documents are readily available online through the respective government or agency website. | These documents are readily available online through the respective government or agency website. |
| 5320adfc4484-071c-4d43-a3cb-c8bcaf8582b3 | Not Translated (0%) | United Nations Security Council Resolutions | United Nations Security Council Resolutions |
| 53213aaf33bf-5d9d-4893-8c76-f282f5eb5e62 | Not Translated (0%) | European Union Council Regulations and European Union Council Decisions | European Union Council Regulations and European Union Council Decisions |
| 53225c508813-19cb-4f95-b4ec-7ec05ca9f6b9 | Not Translated (0%) | United States Executive Orders | United States Executive Orders |
| 5323b6089e31-27c2-422b-b609-8c85df35c096 | Not Translated (0%) | KEY SANCTIONS LISTS | KEY SANCTIONS LISTS |
| 5324c081fc14-09ea-4534-be82-905269b2d04a | Not Translated (0%) | Here again, the following items represent a sample of the sanctions lists that it might be necessary to consult, as each jurisdiction generally issues its own sanctions lists along with its own rules and regulations. | Here again, the following items represent a sample of the sanctions lists that it might be necessary to consult, as each jurisdiction generally issues its own sanctions lists along with its own rules and regulations. |
| 5325c081fc14-09ea-4534-be82-905269b2d04a | Not Translated (0%) | All are available online. | All are available online. |
| 5326ced410d6-32ab-4a71-8543-5dec8ef7692e | Not Translated (0%) | Consolidated United Nations Security Council Sanctions List | Consolidated United Nations Security Council Sanctions List |
| 5327ffaeaf91-3d87-4066-81ca-3909ff5cad0f | Not Translated (0%) | Consolidated list of persons, groups, and entities subject to European Union financial sanctions | Consolidated list of persons, groups, and entities subject to European Union financial sanctions |
| 5328726aec06-977c-47bb-8a7e-3291c2a46c47 | Not Translated (0%) | OFAC’s SDN and non-SDN lists | OFAC’s SDN and non-SDN lists |
| 5329aa0bc7b2-383d-4623-bae3-987921859831 | Not Translated (0%) | KEY TRADE ACTIVITY LISTS | KEY TRADE ACTIVITY LISTS |
| 5330a18ce0ae-879c-42a2-a269-e8e2b2c879b4 | Not Translated (0%) | Key trade activity lists serve to identify the specific government instrument that imposes restrictions or prohibits the trade of certain goods. | Key trade activity lists serve to identify the specific government instrument that imposes restrictions or prohibits the trade of certain goods. |
| 5331a18ce0ae-879c-42a2-a269-e8e2b2c879b4 | Not Translated (0%) | These lists identify parties whose trade activities have been restricted for failing to comply with existing restrictions. | These lists identify parties whose trade activities have been restricted for failing to comply with existing restrictions. |
| 5332a18ce0ae-879c-42a2-a269-e8e2b2c879b4 | Not Translated (0%) | As always, keep in mind that each jurisdiction generally issues its own lists. | As always, keep in mind that each jurisdiction generally issues its own lists. |
| 5333a18ce0ae-879c-42a2-a269-e8e2b2c879b4 | Not Translated (0%) | As these primary sources are generated by governmental authorities, they are considered to be the most reliable: | As these primary sources are generated by governmental authorities, they are considered to be the most reliable: |
| 5334367137da-8537-4091-ae6d-f7f65a256826 | Not Translated (0%) | Common Military List of the European Union. | Common Military List of the European Union. |
| 5335367137da-8537-4091-ae6d-f7f65a256826 | Not Translated (0%) | This is a list of weapons and dual-use goods under the Wassenaar Arrangement. | This is a list of weapons and dual-use goods under the Wassenaar Arrangement. |
| 5336ff2298e5-3466-44ab-b992-f9942e91771e | Not Translated (0%) | United States Department of Commerce Bureau of Industry and Security (BIS) Denied Persons List. | United States Department of Commerce Bureau of Industry and Security (BIS) Denied Persons List. |
| 5337ff2298e5-3466-44ab-b992-f9942e91771e | Not Translated (0%) | This is a list of individuals and entities whose export privileges have been denied due to past conduct, such as individuals and entities that have traded with sanctioned jurisdictions, such as North Korea, or terrorist groups. | This is a list of individuals and entities whose export privileges have been denied due to past conduct, such as individuals and entities that have traded with sanctioned jurisdictions, such as North Korea, or terrorist groups. |
| 533822e47b48-c906-48e5-b93c-84bcceb5a993 | Not Translated (0%) | United States Nuclear Regulatory Commission (NRC) Controls. | United States Nuclear Regulatory Commission (NRC) Controls. |
| 533922e47b48-c906-48e5-b93c-84bcceb5a993 | Not Translated (0%) | The NRC Controls regulate the types of nuclear equipment, such as reactors or components, and fuel used in weapons of mass destruction that require licenses when being exported. | The NRC Controls regulate the types of nuclear equipment, such as reactors or components, and fuel used in weapons of mass destruction that require licenses when being exported. |
| 534036d7996f-8689-49a5-81c1-e40894ee3759 | Not Translated (0%) | United Kingdom Strategic Export Control Lists. | United Kingdom Strategic Export Control Lists. |
| 534136d7996f-8689-49a5-81c1-e40894ee3759 | Not Translated (0%) | The UK Strategic Export Control Lists, like the NRC Controls, specify and regulate those goods that require an export license. | The UK Strategic Export Control Lists, like the NRC Controls, specify and regulate those goods that require an export license. |
| 534272999573-9abd-45b9-811b-9fd2ad80a475 | Not Translated (0%) | France’s Directorate General of the Treasury (DG Trésor) List. | France’s Directorate General of the Treasury (DG Trésor) List. |
| 534372999573-9abd-45b9-811b-9fd2ad80a475 | Not Translated (0%) | This is a table of countries with related sanctions and measures. | This is a table of countries with related sanctions and measures. |
| 534432444dae-41ef-48da-a09d-eaf0a4c35f8b | Not Translated (0%) | INTERNAL CUSTOMER RECORDS AND TRANSACTION ACTIVITY | INTERNAL CUSTOMER RECORDS AND TRANSACTION ACTIVITY |
| 5345e368a630-d955-4662-ba27-bdfadc1f2171 | Not Translated (0%) | The final primary source of information lies within the firm’s records: the information the firm holds on each customer from its KYC and SDD. | The final primary source of information lies within the firm’s records: the information the firm holds on each customer from its KYC and SDD. |
| 5346e368a630-d955-4662-ba27-bdfadc1f2171 | Not Translated (0%) | Both KYC and SDD are firsthand evidence provided directly to the firm by the customer, and most of these internal records are reliable. | Both KYC and SDD are firsthand evidence provided directly to the firm by the customer, and most of these internal records are reliable. |
| 5347e368a630-d955-4662-ba27-bdfadc1f2171 | Not Translated (0%) | The firm will have procedures in place that identify which sources of information can be relied upon as primary sources for simplified KYC, SDD, or investigations. | The firm will have procedures in place that identify which sources of information can be relied upon as primary sources for simplified KYC, SDD, or investigations. |
| 5348490d91a2-c5be-4559-8766-b98323b35ad7 | Not Translated (0%) | For individuals, KYC and SDD will include government-issued forms of identification—such as a passport—containing the customer’s full legal name, date of birth, place of birth, and a photograph clearly showing the individual’s face. | For individuals, KYC and SDD will include government-issued forms of identification—such as a passport—containing the customer’s full legal name, date of birth, place of birth, and a photograph clearly showing the individual’s face. |
| 5349dc39191e-7e6e-40a2-9962-345a9a34dce1 | Not Translated (0%) | For legal entities, KYC and simplified SDD is likely to include certified legal documentation verifying the customer’s legal and trading names, place(s) of operation, and key individuals within the business (such as directors, chief officers, trustees, and so on). | For legal entities, KYC and simplified SDD is likely to include certified legal documentation verifying the customer’s legal and trading names, place(s) of operation, and key individuals within the business (such as directors, chief officers, trustees, and so on). |
| 5350252e5860-80cb-41a7-ace1-c646c54446a2 | Not Translated (0%) | Transaction Activity and “Look Backs” are another valuable internal source of information about the customers. | Transaction Activity and “Look Backs” are another valuable internal source of information about the customers. |
| 5351252e5860-80cb-41a7-ace1-c646c54446a2 | Not Translated (0%) | When conducting an investigation, it can be helpful to review the customer’s transaction activity, either currently or over a specific time period in the past. | When conducting an investigation, it can be helpful to review the customer’s transaction activity, either currently or over a specific time period in the past. |
| 5352252e5860-80cb-41a7-ace1-c646c54446a2 | Not Translated (0%) | (This process is often referred to as a “look-back.”) | (This process is often referred to as a “look-back.”) |
| 5353252e5860-80cb-41a7-ace1-c646c54446a2 | Not Translated (0%) | Reviewing a customer’s recent or past transactions can help in a number of ways, including verifying a customer’s actual activity and revealing red flags by identifying transactions that might indicate links to sanctions targets or jurisdictions and/or spotting payments made in violation of specific sanctions restrictions. | Reviewing a customer’s recent or past transactions can help in a number of ways, including verifying a customer’s actual activity and revealing red flags by identifying transactions that might indicate links to sanctions targets or jurisdictions and/or spotting payments made in violation of specific sanctions restrictions. |
| 5354252e5860-80cb-41a7-ace1-c646c54446a2 | Not Translated (0%) | Existing files and data may reveal all sorts of useful information and investigators should have access to all data already collected. | Existing files and data may reveal all sorts of useful information and investigators should have access to all data already collected. |
| 535543a6ca66-5978-4bdb-a567-f2cb4d563757 | Not Translated (0%) | REVIEW OF TRANSACTION ACTIVITY | REVIEW OF TRANSACTION ACTIVITY |
| 535684ad79f2-7a95-4786-9644-374af6e14a46 | Not Translated (0%) | The following example demonstrates how a transaction review can resolve issues identified in the SDD process. | The following example demonstrates how a transaction review can resolve issues identified in the SDD process. |
| 535784ad79f2-7a95-4786-9644-374af6e14a46 | Not Translated (0%) | To address an identified deficiency, your bank enhances its screening tool to include screening address information against sanctions lists. | To address an identified deficiency, your bank enhances its screening tool to include screening address information against sanctions lists. |
| 535884ad79f2-7a95-4786-9644-374af6e14a46 | Not Translated (0%) | From the enhanced process, you find that a current account holder is flagged for his residential address, which is located in a country subject to comprehensive sanctions. | From the enhanced process, you find that a current account holder is flagged for his residential address, which is located in a country subject to comprehensive sanctions. |
| 535984ad79f2-7a95-4786-9644-374af6e14a46 | Not Translated (0%) | The firm’s front-line staff contacts the customer, who tells them that the address is outdated—he has been living at Flat 10, London Road, Cambridge, UK, since 2015. | The firm’s front-line staff contacts the customer, who tells them that the address is outdated—he has been living at Flat 10, London Road, Cambridge, UK, since 2015. |
| 5360e1ade4e3-3a9f-4832-b3e4-6aae9d613ed5 | Not Translated (0%) | Claims like this sound reasonable enough—people do move, after all—but the accuracy of this information needs to be verified rather than accepted at face value. | Claims like this sound reasonable enough—people do move, after all—but the accuracy of this information needs to be verified rather than accepted at face value. |
| 5361e1ade4e3-3a9f-4832-b3e4-6aae9d613ed5 | Not Translated (0%) | It’s necessary to learn more in order to be sure the firm has not dealt in funds in any way that violates sanctions restrictions. | It’s necessary to learn more in order to be sure the firm has not dealt in funds in any way that violates sanctions restrictions. |
| 5362e1ade4e3-3a9f-4832-b3e4-6aae9d613ed5 | Not Translated (0%) | A customer may have several addresses and operate across many jurisdictions. | A customer may have several addresses and operate across many jurisdictions. |
| 536314fdd2cf-ae89-4de6-ac2e-6aa1f42ece39 | Not Translated (0%) | To find the information needed, launch a basic review of the customer’s account activity. | To find the information needed, launch a basic review of the customer’s account activity. |
| 536414fdd2cf-ae89-4de6-ac2e-6aa1f42ece39 | Not Translated (0%) | In this review, you notice that for the past four years, the customer has been making regular purchases at Cambridge-area supermarkets. | In this review, you notice that for the past four years, the customer has been making regular purchases at Cambridge-area supermarkets. |
| 536514fdd2cf-ae89-4de6-ac2e-6aa1f42ece39 | Not Translated (0%) | He has also been paying utility bills for the property at the London Road address he provided. | He has also been paying utility bills for the property at the London Road address he provided. |
| 536614fdd2cf-ae89-4de6-ac2e-6aa1f42ece39 | Not Translated (0%) | Additionally, you find monthly, direct-deposit salary payments from a company based in the United Kingdom. | Additionally, you find monthly, direct-deposit salary payments from a company based in the United Kingdom. |
| 536714fdd2cf-ae89-4de6-ac2e-6aa1f42ece39 | Not Translated (0%) | These three data points seem to indicate the customer’s active residency in the United Kingdom, which is consistent with the customer’s statement. | These three data points seem to indicate the customer’s active residency in the United Kingdom, which is consistent with the customer’s statement. |
| 536814fdd2cf-ae89-4de6-ac2e-6aa1f42ece39 | Not Translated (0%) | Even this simple review of transaction activity has already helped verify the new information the customer provided. | Even this simple review of transaction activity has already helped verify the new information the customer provided. |
| 53692ecb1a77-1509-4cd3-805f-b6837bd72b02 | Not Translated (0%) | Another approach would be to start with the date the applicable sanctions restriction went into effect. | Another approach would be to start with the date the applicable sanctions restriction went into effect. |
| 53702ecb1a77-1509-4cd3-805f-b6837bd72b02 | Not Translated (0%) | Why would this date make a difference? | Why would this date make a difference? |
| 53712ecb1a77-1509-4cd3-805f-b6837bd72b02 | Not Translated (0%) | It’s simple: | It’s simple: |
| 53722ecb1a77-1509-4cd3-805f-b6837bd72b02 | Not Translated (0%) | If the customer’s “problematic” address on file (the one in a country currently subject to comprehensive sanctions) was listed before the sanctions restrictions went into effect, the address would not have raised an immediate red flag during the onboarding process (though, upon sanctions being imposed, this should have raised an alert within 24 to 48 hours). | If the customer’s “problematic” address on file (the one in a country currently subject to comprehensive sanctions) was listed before the sanctions restrictions went into effect, the address would not have raised an immediate red flag during the onboarding process (though, upon sanctions being imposed, this should have raised an alert within 24 to 48 hours). |
| 53732ecb1a77-1509-4cd3-805f-b6837bd72b02 | Not Translated (0%) | In this sort of look-back review, examine when events happened relative to each other. | In this sort of look-back review, examine when events happened relative to each other. |
| 53742ecb1a77-1509-4cd3-805f-b6837bd72b02 | Not Translated (0%) | Specifically, when did the sanctions go into effect, and when did the customer live in the country being sanctioned? | Specifically, when did the sanctions go into effect, and when did the customer live in the country being sanctioned? |
| 53752ecb1a77-1509-4cd3-805f-b6837bd72b02 | Not Translated (0%) | Take a broader historical and political look at the customer’s location and activity in light of the timing of the sanctions and the location the sanctions targeted. | Take a broader historical and political look at the customer’s location and activity in light of the timing of the sanctions and the location the sanctions targeted. |
| 537604cc6bdd-f40b-49b6-bd9a-b14990dfb68f | Not Translated (0%) | If it’s determined that the customer resided in the sanctioned country when the sanctions were in effect, or he has sent payments to or received payments from that jurisdiction since the sanctions restrictions were imposed, it’s necessary to escalate the case for further investigation, as it could mean that the bank—possibly—dealt in funds in violation of the sanctions restrictions. | If it’s determined that the customer resided in the sanctioned country when the sanctions were in effect, or he has sent payments to or received payments from that jurisdiction since the sanctions restrictions were imposed, it’s necessary to escalate the case for further investigation, as it could mean that the bank—possibly—dealt in funds in violation of the sanctions restrictions. |
| 5377620ffe06-cfd2-4feb-bc16-2b1555600cb3 | Not Translated (0%) | Other Considerations for Determining the Scope of Transactional Review | Other Considerations for Determining the Scope of Transactional Review |
| 5378215264fa-980b-40c4-b8c6-e36df6922d73 | Not Translated (0%) | We’ve already seen some of the ways in which transaction activities can be a great source of primary information, but there are two additional factors to keep in mind when conducting this type of review. | We’ve already seen some of the ways in which transaction activities can be a great source of primary information, but there are two additional factors to keep in mind when conducting this type of review. |
| 5379215264fa-980b-40c4-b8c6-e36df6922d73 | Not Translated (0%) | The following are some of the more important considerations—and potential red flags. | The following are some of the more important considerations—and potential red flags. |
| 5380a974b90c-7e4a-48c7-a950-90e480a2e6c8 | Not Translated (0%) | First, it often helps to limit the review to transactions that occurred within a defined, optimal timeframe. | First, it often helps to limit the review to transactions that occurred within a defined, optimal timeframe. |
| 5381a974b90c-7e4a-48c7-a950-90e480a2e6c8 | Not Translated (0%) | Defining the length of the look-back in this way will depend on the specifics of each case, as well as on your company’s general policies and standard procedures for look-back reviews. | Defining the length of the look-back in this way will depend on the specifics of each case, as well as on your company’s general policies and standard procedures for look-back reviews. |
| 5382a974b90c-7e4a-48c7-a950-90e480a2e6c8 | Not Translated (0%) | For example, you could frame the time period to try to identify a possible past sanctions violation. | For example, you could frame the time period to try to identify a possible past sanctions violation. |
| 5383a974b90c-7e4a-48c7-a950-90e480a2e6c8 | Not Translated (0%) | Depending on the firm’s preferred procedure, you will often begin by looking at the past 12 months, only looking further back if a possible violation has been found in that period. | Depending on the firm’s preferred procedure, you will often begin by looking at the past 12 months, only looking further back if a possible violation has been found in that period. |
| 5384a974b90c-7e4a-48c7-a950-90e480a2e6c8 | Not Translated (0%) | This is a good strategy in locations (such as Cuba and Iran) with longstanding sanctions restrictions in place, because in these cases it can be difficult to determine exactly when a customer left the sanctioned territory. | This is a good strategy in locations (such as Cuba and Iran) with longstanding sanctions restrictions in place, because in these cases it can be difficult to determine exactly when a customer left the sanctioned territory. |
| 53856f898969-ce0d-4c96-8805-a8e99d549cfc | Not Translated (0%) | Second, it is necessary to define the nature of payments the review will encompass. | Second, it is necessary to define the nature of payments the review will encompass. |
| 53866f898969-ce0d-4c96-8805-a8e99d549cfc | Not Translated (0%) | Certain types of transactions are more highly correlated with red flags than others are. | Certain types of transactions are more highly correlated with red flags than others are. |
| 53876f898969-ce0d-4c96-8805-a8e99d549cfc | Not Translated (0%) | Just three examples of possible red flags are: | Just three examples of possible red flags are: |
| 5388e790b9b0-099c-4bc5-8596-cf976fde9527 | Not Translated (0%) | Purchases made online. | Purchases made online. |
| 5389e790b9b0-099c-4bc5-8596-cf976fde9527 | Not Translated (0%) | These can be problematic because they can be made from anywhere in the world and easily paid for with a payment card from an unsanctioned territory. | These can be problematic because they can be made from anywhere in the world and easily paid for with a payment card from an unsanctioned territory. |
| 539073529c05-7222-41b5-aa33-8907af8e3e05 | Not Translated (0%) | Cross-border payments to countries with proximity to sanctioned territories. | Cross-border payments to countries with proximity to sanctioned territories. |
| 539173529c05-7222-41b5-aa33-8907af8e3e05 | Not Translated (0%) | Payments made to countries close to sanctioned territories (such as Turkey and Syria) can point to a possible connection between the customer and businesses or individuals within the sanction-restricted area. | Payments made to countries close to sanctioned territories (such as Turkey and Syria) can point to a possible connection between the customer and businesses or individuals within the sanction-restricted area. |
| 539273529c05-7222-41b5-aa33-8907af8e3e05 | Not Translated (0%) | For this reason, all cross-border transactions should be scrutinized carefully. | For this reason, all cross-border transactions should be scrutinized carefully. |
| 5393665559fa-d672-4df0-8541-09d94067a40f | Not Translated (0%) | Transactions involving a money service business (MSB). | Transactions involving a money service business (MSB). |
| 5394665559fa-d672-4df0-8541-09d94067a40f | Not Translated (0%) | These transactions can be hard to identify, but the firm might maintain a list of them for reference. | These transactions can be hard to identify, but the firm might maintain a list of them for reference. |
| 5395665559fa-d672-4df0-8541-09d94067a40f | Not Translated (0%) | Transactions to or from an MSB might indicate a customer’s connection to a sanctioned jurisdiction, as MSBs are often used as intermediaries in the flow of funds into and out of restricted areas. | Transactions to or from an MSB might indicate a customer’s connection to a sanctioned jurisdiction, as MSBs are often used as intermediaries in the flow of funds into and out of restricted areas. |
| 53963d503e5f-9204-41a0-abe1-9ff53a720ee5 | Not Translated (0%) | Additionally, it’s necessary to determine the extent of payment message review. | Additionally, it’s necessary to determine the extent of payment message review. |
| 53973d503e5f-9204-41a0-abe1-9ff53a720ee5 | Not Translated (0%) | Has the customer transferred funds into and out of its accounts? | Has the customer transferred funds into and out of its accounts? |
| 53983d503e5f-9204-41a0-abe1-9ff53a720ee5 | Not Translated (0%) | How and when were the transfers made? | How and when were the transfers made? |
| 53993d503e5f-9204-41a0-abe1-9ff53a720ee5 | Not Translated (0%) | Have all the parties to these transactions been identified? | Have all the parties to these transactions been identified? |
| 540097d52078-50fc-40f7-b9e4-bdf28f87bccc | Not Translated (0%) | CUSTOMER OUTREACH | CUSTOMER OUTREACH |
| 540161f8239a-c728-480d-b9c9-a3ae188f8798 | Not Translated (0%) | Another primary source of information is customer outreach, which helps provide a better understanding of customers and their activity. | Another primary source of information is customer outreach, which helps provide a better understanding of customers and their activity. |
| 540261f8239a-c728-480d-b9c9-a3ae188f8798 | Not Translated (0%) | Customer outreach is a logical extension of the KYC and SDD information the firm has on file. | Customer outreach is a logical extension of the KYC and SDD information the firm has on file. |
| 540361f8239a-c728-480d-b9c9-a3ae188f8798 | Not Translated (0%) | Especially when public data is sparse or unavailable, it is an important investigational tool that falls to first-line team members. | Especially when public data is sparse or unavailable, it is an important investigational tool that falls to first-line team members. |
| 540461f8239a-c728-480d-b9c9-a3ae188f8798 | Not Translated (0%) | Relationship managers and other customer-facing staff will be best placed to conduct customer outreach and communicate the findings to the compliance team. | Relationship managers and other customer-facing staff will be best placed to conduct customer outreach and communicate the findings to the compliance team. |
| 540561f8239a-c728-480d-b9c9-a3ae188f8798 | Not Translated (0%) | While conducting customer outreach during an active investigation, however, keep in mind that the investigation process may also involve an AML investigation and as such should maintain confidentiality and avoid tipping off the customer. | While conducting customer outreach during an active investigation, however, keep in mind that the investigation process may also involve an AML investigation and as such should maintain confidentiality and avoid tipping off the customer. |
| 5406157bf846-44da-4427-a125-96ee6604ad54 | Not Translated (0%) | One unique and valuable aspect of customer outreach is that it provides investigators with the opportunity to observe the customer’s behavior in response to a request for additional information. | One unique and valuable aspect of customer outreach is that it provides investigators with the opportunity to observe the customer’s behavior in response to a request for additional information. |
| 5407157bf846-44da-4427-a125-96ee6604ad54 | Not Translated (0%) | The vast majority of the firm’s customers will cooperate fully with any such requests, eager to get to the bottom of the confusion and, in essence, clear their reputations. | The vast majority of the firm’s customers will cooperate fully with any such requests, eager to get to the bottom of the confusion and, in essence, clear their reputations. |
| 5408157bf846-44da-4427-a125-96ee6604ad54 | Not Translated (0%) | A response that is evasive, defensive, or confrontational could indicate that the customer has not been entirely honest with the firm, or has perhaps sought to hide or misrepresent certain transactions for some reason. | A response that is evasive, defensive, or confrontational could indicate that the customer has not been entirely honest with the firm, or has perhaps sought to hide or misrepresent certain transactions for some reason. |
| 5409157bf846-44da-4427-a125-96ee6604ad54 | Not Translated (0%) | Of course, this does not necessarily mean the customer is guilty of violating a sanctions restriction, but it raises a red flag and warrants further investigation. | Of course, this does not necessarily mean the customer is guilty of violating a sanctions restriction, but it raises a red flag and warrants further investigation. |
| 54100ccaa0a6-3bc7-4c8f-8815-6491d4e45534 | Not Translated (0%) | Secondary Sources of Information | Secondary Sources of Information |
| 54112b1b5e71-3751-4545-8641-ab9995370c48 | Not Translated (0%) | Secondary sources contain information that has generally already appeared in primary documents. | Secondary sources contain information that has generally already appeared in primary documents. |
| 54122b1b5e71-3751-4545-8641-ab9995370c48 | Not Translated (0%) | Inquiries for gathering primary sources and gathering secondary sources are conducted separately. | Inquiries for gathering primary sources and gathering secondary sources are conducted separately. |
| 54132b1b5e71-3751-4545-8641-ab9995370c48 | Not Translated (0%) | If there is a discrepancy between primary sources and secondary sources, it is a red flag that deserves, at minimum, further investigation in order to clarify the discrepancy. | If there is a discrepancy between primary sources and secondary sources, it is a red flag that deserves, at minimum, further investigation in order to clarify the discrepancy. |
| 54142b1b5e71-3751-4545-8641-ab9995370c48 | Not Translated (0%) | Commonly used secondary sources include corporate registers, third-party databases, and media publications. | Commonly used secondary sources include corporate registers, third-party databases, and media publications. |
| 54152b1b5e71-3751-4545-8641-ab9995370c48 | Not Translated (0%) | Like primary sources, secondary sources can provide valuable information about customers. | Like primary sources, secondary sources can provide valuable information about customers. |
| 54162b1b5e71-3751-4545-8641-ab9995370c48 | Not Translated (0%) | That said, remember that not all secondary sources are equally reliable. | That said, remember that not all secondary sources are equally reliable. |
| 54172b1b5e71-3751-4545-8641-ab9995370c48 | Not Translated (0%) | Just as news stories from different media channels and outlets vary in their accuracy, some secondary sources are more valuable than others. | Just as news stories from different media channels and outlets vary in their accuracy, some secondary sources are more valuable than others. |
| 5418823c6cf0-9f6b-4822-9abb-8f26d024f49c | Not Translated (0%) | GOOGLE AND OTHER SEARCH ENGINES | GOOGLE AND OTHER SEARCH ENGINES |
| 5419f5ff46b3-31e3-4026-8381-6189286593b3 | Not Translated (0%) | An easy way to find information on an entity or individual is to do a Google search. | An easy way to find information on an entity or individual is to do a Google search. |
| 5420f5ff46b3-31e3-4026-8381-6189286593b3 | Not Translated (0%) | The search will provide basic information that may need to be corroborated, but could be an efficient starting point for an investigation. | The search will provide basic information that may need to be corroborated, but could be an efficient starting point for an investigation. |
| 5421f5ff46b3-31e3-4026-8381-6189286593b3 | Not Translated (0%) | The initial search could also provide additional threads for further investigation. | The initial search could also provide additional threads for further investigation. |
| 5422f5ff46b3-31e3-4026-8381-6189286593b3 | Not Translated (0%) | This type of search could also provide useful positive or negative indices to support or deny elements of an investigation and eliminate false positives. | This type of search could also provide useful positive or negative indices to support or deny elements of an investigation and eliminate false positives. |
| 5423f5ff46b3-31e3-4026-8381-6189286593b3 | Not Translated (0%) | For example, if Corporation X matches against the sanctions list, albeit not with a full name match, and additional research on Google finds and verifies that Corporation X is actually in dairy while the sanctions target is engaged in nuclear technology, this can be verified by transactional activity and the investigation can be closed. | For example, if Corporation X matches against the sanctions list, albeit not with a full name match, and additional research on Google finds and verifies that Corporation X is actually in dairy while the sanctions target is engaged in nuclear technology, this can be verified by transactional activity and the investigation can be closed. |
| 5424f5ff46b3-31e3-4026-8381-6189286593b3 | Not Translated (0%) | When following this course, it is important to document each step of the investigation, such as including in the file screenshots of the results of the search. | When following this course, it is important to document each step of the investigation, such as including in the file screenshots of the results of the search. |
| 5425b0e42009-3224-4ea4-86f5-1b17a9d296fb | Not Translated (0%) | SOCIAL MEDIA | SOCIAL MEDIA |
| 5426bd61b518-0bd0-41a1-ab7f-1cf8ef8ab782 | Not Translated (0%) | Social media like Facebook, Instagram, and LinkedIn are not reliable sources of information as the information is not verified and can be easily edited or manipulated by the party under investigation. | Social media like Facebook, Instagram, and LinkedIn are not reliable sources of information as the information is not verified and can be easily edited or manipulated by the party under investigation. |
| 5427bd61b518-0bd0-41a1-ab7f-1cf8ef8ab782 | Not Translated (0%) | However, social media can reveal interesting and useful information on connections between parties and provide leads for further investigation. | However, social media can reveal interesting and useful information on connections between parties and provide leads for further investigation. |
| 5428d0b10257-1082-4556-91c8-39a77ecd1329 | Not Translated (0%) | CORPORATE REGISTERS | CORPORATE REGISTERS |
| 54297b778aa0-43b0-4e32-a59e-e5fc526f0e8f | Not Translated (0%) | Corporate registers—often publicly available on the company’s website or at websites maintained by professional associations or entities such as chambers of commerce or legal databases—include information about when a corporation was formed and who its owners and directors are. | Corporate registers—often publicly available on the company’s website or at websites maintained by professional associations or entities such as chambers of commerce or legal databases—include information about when a corporation was formed and who its owners and directors are. |
| 5430622756e8-c405-430d-9fcc-1b04f8c77bc1 | Not Translated (0%) | In the United States, the Secretary of State for each state and the District of Columbia maintains a register that can be accessed electronically. | In the United States, the Secretary of State for each state and the District of Columbia maintains a register that can be accessed electronically. |
| 5431622756e8-c405-430d-9fcc-1b04f8c77bc1 | Not Translated (0%) | Each state has its own website. | Each state has its own website. |
| 5432622756e8-c405-430d-9fcc-1b04f8c77bc1 | Not Translated (0%) | Information available on these websites generally includes the type of organization (corporation, limited liability company [LLC], not-for-profit, etc.), address, date of incorporation, registered organizers and officers, place(s) of business, and information on the current status of the entity. | Information available on these websites generally includes the type of organization (corporation, limited liability company [LLC], not-for-profit, etc.), address, date of incorporation, registered organizers and officers, place(s) of business, and information on the current status of the entity. |
| 5433622756e8-c405-430d-9fcc-1b04f8c77bc1 | Not Translated (0%) | It can inform whether the company is still in existence or if it has been disbanded. | It can inform whether the company is still in existence or if it has been disbanded. |
| 5434622756e8-c405-430d-9fcc-1b04f8c77bc1 | Not Translated (0%) | Basic financial information may also be available on state registries. | Basic financial information may also be available on state registries. |
| 5435da3baff0-0649-4f7d-b160-8a5987fdc6ba | Not Translated (0%) | Other jurisdictions in Organisation for Economic Co-operation and Development (OECD) countries have similar registers that are easily accessible. | Other jurisdictions in Organisation for Economic Co-operation and Development (OECD) countries have similar registers that are easily accessible. |
| 5436bdb4037a-e623-4bc3-bc21-45bc52940a7b | Not Translated (0%) | If an entity is being investigated that issues stock or other securities, the exchange(s) where the instruments are traded will maintain updated legal and financial information including copies of quarterly and annual reports. | If an entity is being investigated that issues stock or other securities, the exchange(s) where the instruments are traded will maintain updated legal and financial information including copies of quarterly and annual reports. |
| 5437bdb4037a-e623-4bc3-bc21-45bc52940a7b | Not Translated (0%) | Some of these documents can be quite detailed and provide information on the type(s) of business the company engages in, the markets in which it operates, its key customers, and other details that could be helpful to an investigator. | Some of these documents can be quite detailed and provide information on the type(s) of business the company engages in, the markets in which it operates, its key customers, and other details that could be helpful to an investigator. |
| 5438403e1f41-0cac-482c-958a-f3719502e24a | Not Translated (0%) | THIRD-PARTY DATABASES | THIRD-PARTY DATABASES |
| 54390cd752f1-ea9f-45cf-a7d6-b9f667980e81 | Not Translated (0%) | Third-party databases can be a good source of both primary and secondary sources. | Third-party databases can be a good source of both primary and secondary sources. |
| 54400cd752f1-ea9f-45cf-a7d6-b9f667980e81 | Not Translated (0%) | Although third-party databases are often helpful with due diligence, the information they provide should never stand on its own. | Although third-party databases are often helpful with due diligence, the information they provide should never stand on its own. |
| 54410cd752f1-ea9f-45cf-a7d6-b9f667980e81 | Not Translated (0%) | Rating agencies maintain databases that can be consulted (sometimes for a fee); exchanges (NYSE, HKEX) can also be sources of information. | Rating agencies maintain databases that can be consulted (sometimes for a fee); exchanges (NYSE, HKEX) can also be sources of information. |
| 54420cd752f1-ea9f-45cf-a7d6-b9f667980e81 | Not Translated (0%) | Legal databases can generally be consulted at no or low cost, and some specialized companies provide information to their subscribers. | Legal databases can generally be consulted at no or low cost, and some specialized companies provide information to their subscribers. |
| 54436516572f-367d-4415-acfd-547f3b79d7e0 | Not Translated (0%) | Some specialized companies are in the business of providing integrated services that allow financial institutions to meet all regulatory requirements (not only sanctions requirements). | Some specialized companies are in the business of providing integrated services that allow financial institutions to meet all regulatory requirements (not only sanctions requirements). |
| 54446516572f-367d-4415-acfd-547f3b79d7e0 | Not Translated (0%) | These companies can provide tailored, comprehensive solutions that include the coverage of politically exposed persons (PEP), close associates, and family members; state-owned entities and state-invested enterprises; global sanctions lists, American sanctions lists, and narrative sanctions (sanctions ownership information); global regulatory and law enforcement lists; negative media; Iran economic interest (IEI); and vessels information. | These companies can provide tailored, comprehensive solutions that include the coverage of politically exposed persons (PEP), close associates, and family members; state-owned entities and state-invested enterprises; global sanctions lists, American sanctions lists, and narrative sanctions (sanctions ownership information); global regulatory and law enforcement lists; negative media; Iran economic interest (IEI); and vessels information. |
| 54456516572f-367d-4415-acfd-547f3b79d7e0 | Not Translated (0%) | Those tools are usually provided on a subscription basis; they can be quite sophisticated and require special training to use effectively. | Those tools are usually provided on a subscription basis; they can be quite sophisticated and require special training to use effectively. |
| 54463e74cca5-e032-4a27-b81d-74f2e9c9231c | Not Translated (0%) | MEDIA PUBLICATIONS | MEDIA PUBLICATIONS |
| 54473fa97589-e1ce-406a-a827-faff9ae186ff | Not Translated (0%) | Like third-party databases, media publications vary widely in their accuracy and usefulness to an investigation. | Like third-party databases, media publications vary widely in their accuracy and usefulness to an investigation. |
| 54483fa97589-e1ce-406a-a827-faff9ae186ff | Not Translated (0%) | Some media publications make accurate reporting a top priority, while others place a higher value on sensational stories that boost sales, clicks, “likes,” or traffic to the publisher’s web page. | Some media publications make accurate reporting a top priority, while others place a higher value on sensational stories that boost sales, clicks, “likes,” or traffic to the publisher’s web page. |
| 54493fa97589-e1ce-406a-a827-faff9ae186ff | Not Translated (0%) | For this reason, many organizations maintain lists both of media publications that either can or cannot be consulted in an investigation. | For this reason, many organizations maintain lists both of media publications that either can or cannot be consulted in an investigation. |
| 5450c9e78aa5-63df-4772-bb2f-c9139b10eedd | Not Translated (0%) | SPECIALIST TEAMS | SPECIALIST TEAMS |
| 5451499d1c65-21c3-4258-8a65-307228b7fd3b | Not Translated (0%) | In addition to corporate registers, third-party databases, and media publications, specialists such as advisory teams or law firms (or both) can be called in for additional support. | In addition to corporate registers, third-party databases, and media publications, specialists such as advisory teams or law firms (or both) can be called in for additional support. |
| 5452499d1c65-21c3-4258-8a65-307228b7fd3b | Not Translated (0%) | These can be internal advisory teams, external advisors, or intelligence-provider firms. | These can be internal advisory teams, external advisors, or intelligence-provider firms. |
| 5453499d1c65-21c3-4258-8a65-307228b7fd3b | Not Translated (0%) | Many firms have internal, established sanctions advisory teams made up of specialists in sanctions regulations and related laws; these teams often include former employees of regulatory bodies. | Many firms have internal, established sanctions advisory teams made up of specialists in sanctions regulations and related laws; these teams often include former employees of regulatory bodies. |
| 5454499d1c65-21c3-4258-8a65-307228b7fd3b | Not Translated (0%) | Firms might also have well-established relationships with legal experts outside of the firm. | Firms might also have well-established relationships with legal experts outside of the firm. |
| 5455499d1c65-21c3-4258-8a65-307228b7fd3b | Not Translated (0%) | Additionally, some firms hire an external intelligence search provider; these search providers often have local sources available in several countries, which is especially important in jurisdictions with less transparency. | Additionally, some firms hire an external intelligence search provider; these search providers often have local sources available in several countries, which is especially important in jurisdictions with less transparency. |
| 5456f8c62c29-a496-4f20-8d83-8cabf61ec338 | Not Translated (0%) | If you deem it necessary to use such additional resources, do so in line with your institution’s policies. | If you deem it necessary to use such additional resources, do so in line with your institution’s policies. |
| 5457f8c62c29-a496-4f20-8d83-8cabf61ec338 | Not Translated (0%) | As there are almost always additional costs associated with these additional resources, there will likely be some restrictions, or prior approval from management may be required. | As there are almost always additional costs associated with these additional resources, there will likely be some restrictions, or prior approval from management may be required. |
| 5458abbb942c-60ed-4cfa-a5e4-f1c78b99dbf5 | Not Translated (0%) | Identifying and Blocking (or Freezing) Assets | Identifying and Blocking (or Freezing) Assets |
| 5459ea2b8203-b065-4ca0-8854-e3d39b0ef2db | Not Translated (0%) | Now that the investigation has been conducted, this section discusses what comes next: the processes for identifying assets and blocking or freezing them in the event of a sanctions violation on the customer’s part. | Now that the investigation has been conducted, this section discusses what comes next: the processes for identifying assets and blocking or freezing them in the event of a sanctions violation on the customer’s part. |
| 546007988f68-106a-4ae2-b5f9-159782430aec | Not Translated (0%) | Identification of Assets | Identification of Assets |
| 54612f22bfcc-21dc-4ba9-8c56-6475b605b379 | Not Translated (0%) | Broadly defined, the term “asset” refers to any funds or economic resources owned by the customer. | Broadly defined, the term “asset” refers to any funds or economic resources owned by the customer. |
| 54622f22bfcc-21dc-4ba9-8c56-6475b605b379 | Not Translated (0%) | Although the details vary slightly from jurisdiction to jurisdiction, the conceptual definition is relatively constant around the world. | Although the details vary slightly from jurisdiction to jurisdiction, the conceptual definition is relatively constant around the world. |
| 54632f22bfcc-21dc-4ba9-8c56-6475b605b379 | Not Translated (0%) | This ensures that all types of assets intended to be covered by a sanctions restriction are in fact covered. | This ensures that all types of assets intended to be covered by a sanctions restriction are in fact covered. |
| 54642f22bfcc-21dc-4ba9-8c56-6475b605b379 | Not Translated (0%) | Some of the items commonly considered as assets include: | Some of the items commonly considered as assets include: |
| 5465c4ef6c10-368e-495d-be54-275f80a1769b | Not Translated (0%) | Cash | Cash |
| 54665ed917fd-8d58-4217-b9b8-989d3edacea3 | Not Translated (0%) | Checks | Checks |
| 5467a80f0c9a-afc3-4a3c-beac-f39c4d233acc | Not Translated (0%) | Bank Deposits | Bank Deposits |
| 54683f081182-1a0c-4d4f-935c-09adc564c915 | Not Translated (0%) | Debts and debt obligations | Debts and debt obligations |
| 546943c18385-c4b7-45b3-94dc-a4b302c6d575 | Not Translated (0%) | Money Orders | Money Orders |
| 547087c7aea1-eca8-4454-a843-64131cc53b1d | Not Translated (0%) | Securities | Securities |
| 5471bb9cf179-7b5a-485d-83a7-fc1dabf373c7 | Not Translated (0%) | Bonds | Bonds |
| 5472b51950cd-429e-484e-86fd-30698f83dec4 | Not Translated (0%) | Notes | Notes |
| 5473f46c945f-081a-443a-959d-f27355c5fae4 | Not Translated (0%) | Warrants | Warrants |
| 5474ad90a651-3ce7-4749-b51d-d0f036f97156 | Not Translated (0%) | Derivative contracts | Derivative contracts |
| 54750e8e2a6d-486d-41b9-b95f-6fcb6c578c53 | Not Translated (0%) | Insurance policies | Insurance policies |
| 5476eebfaaa2-9298-46f3-98f9-3587fc1ba6de | Not Translated (0%) | Dividends | Dividends |
| 5477b6935001-a47d-4b0b-adb0-e4b1aa0f2dab | Not Translated (0%) | Letters of credit | Letters of credit |
| 547822bf393b-f6a9-4914-941b-87f2479faaeb | Not Translated (0%) | Bills of lading | Bills of lading |
| 5479d77981a9-15ad-4dce-9831-c2319265b554 | Not Translated (0%) | Safety deposit boxes (and their contents) | Safety deposit boxes (and their contents) |
| 54807e3f9263-d76b-435a-a126-6d4fefa9e744 | Not Translated (0%) | Cars, planes, boats | Cars, planes, boats |
| 54817ff8316a-02a9-43f7-a789-4e50b0e4b25a | Not Translated (0%) | Works of art and other valuable objects | Works of art and other valuable objects |
| 5482ed540331-9e0c-44da-b025-f987e6ac5f58 | Not Translated (0%) | Real estate properties | Real estate properties |
| 5483879a9694-c245-4f72-a252-f05f6203f03e | Not Translated (0%) | Virtual assets | Virtual assets |
| 5484dc23f73c-b054-42a6-b24f-75033b4fc958 | Not Translated (0%) | Legal requirements in a given jurisdiction govern which of a customer’s assets must be frozen or blocked when a sanctions violation occurs. | Legal requirements in a given jurisdiction govern which of a customer’s assets must be frozen or blocked when a sanctions violation occurs. |
| 5485dc23f73c-b054-42a6-b24f-75033b4fc958 | Not Translated (0%) | You will need to read and understand the types of assets a specific legislative body requires be frozen in each case. | You will need to read and understand the types of assets a specific legislative body requires be frozen in each case. |
| 5486dc23f73c-b054-42a6-b24f-75033b4fc958 | Not Translated (0%) | OFAC’s website and the European Union Guidance on Sanctions document are often helpful in this regard. | OFAC’s website and the European Union Guidance on Sanctions document are often helpful in this regard. |
| 5487dc23f73c-b054-42a6-b24f-75033b4fc958 | Not Translated (0%) | The EU Service for Foreign Policy Instruments (FPI) maintains a website that outlines applicable policies and restrictions. | The EU Service for Foreign Policy Instruments (FPI) maintains a website that outlines applicable policies and restrictions. |
| 5488d4d2a6bc-ce03-47a7-929c-97511f2f0f86 | Not Translated (0%) | In order to be effective, the process of freezing a sanctions target’s funds (or other assets) must occur quickly and effectively. | In order to be effective, the process of freezing a sanctions target’s funds (or other assets) must occur quickly and effectively. |
| 5489d4d2a6bc-ce03-47a7-929c-97511f2f0f86 | Not Translated (0%) | Asset freezing, which is similar to asset blocking, should take place immediately after a legislative act comes into force. | Asset freezing, which is similar to asset blocking, should take place immediately after a legislative act comes into force. |
| 5490d4d2a6bc-ce03-47a7-929c-97511f2f0f86 | Not Translated (0%) | In order to avoid the predictable response of asset flight—in which a customer attempts to move assets into a different jurisdiction—the time between a designation being made public (adding a target to a list) and the freezing of assets must be as short as possible. | In order to avoid the predictable response of asset flight—in which a customer attempts to move assets into a different jurisdiction—the time between a designation being made public (adding a target to a list) and the freezing of assets must be as short as possible. |
| 549159c72078-ac75-4aed-837a-3995167c4da9 | Not Translated (0%) | United Nations Security Council resolutions on sanctions, adopted under Chapter VII of the United Nations Charter, refer to the freezing of financial assets or economic resources “without delay.” | United Nations Security Council resolutions on sanctions, adopted under Chapter VII of the United Nations Charter, refer to the freezing of financial assets or economic resources “without delay.” |
| 549259c72078-ac75-4aed-837a-3995167c4da9 | Not Translated (0%) | This means that the financial institution will need to act promptly to prohibit access to these assets. | This means that the financial institution will need to act promptly to prohibit access to these assets. |
| 549359c72078-ac75-4aed-837a-3995167c4da9 | Not Translated (0%) | This is done by placing a block or restriction on the assets to prevent the target from accessing them. | This is done by placing a block or restriction on the assets to prevent the target from accessing them. |
| 549459c72078-ac75-4aed-837a-3995167c4da9 | Not Translated (0%) | This is necessary to prevent the dual risks of asset flight and asset dissipation. | This is necessary to prevent the dual risks of asset flight and asset dissipation. |
| 5495e13cbe6c-36fa-4874-ba7d-c1c65f9162cc | Not Translated (0%) | Comparing Blocking or Freezing Assets in the United Kingdom and the Netherlands | Comparing Blocking or Freezing Assets in the United Kingdom and the Netherlands |
| 54969cd914d7-cdfd-4f6e-a238-2cd8bc07a5b9 | Not Translated (0%) | To get an idea of how different jurisdictions handle blocking or freezing the assets of a designated person, it is useful to look at the processes in the United Kingdom and the Netherlands. | To get an idea of how different jurisdictions handle blocking or freezing the assets of a designated person, it is useful to look at the processes in the United Kingdom and the Netherlands. |
| 54979cd914d7-cdfd-4f6e-a238-2cd8bc07a5b9 | Not Translated (0%) | (Remember that in the United States, firms need to follow OFAC’s requirements.) | (Remember that in the United States, firms need to follow OFAC’s requirements.) |
| 54982ba26c7a-1c7d-4e4f-be05-a06b9649b987 | Not Translated (0%) | In the United Kingdom, a firm must either know with certainty, or have “reasonable cause to suspect,” that it is in possession or control of the funds or economic resources of a designated person, or that the firm is somehow otherwise dealing in these funds or resources. | In the United Kingdom, a firm must either know with certainty, or have “reasonable cause to suspect,” that it is in possession or control of the funds or economic resources of a designated person, or that the firm is somehow otherwise dealing in these funds or resources. |
| 54992ba26c7a-1c7d-4e4f-be05-a06b9649b987 | Not Translated (0%) | Reasonable cause to suspect is defined as a situation in which there are factual circumstances from which an honest and reasonable person should have inferred knowledge or formed the suspicion of wrongdoing. | Reasonable cause to suspect is defined as a situation in which there are factual circumstances from which an honest and reasonable person should have inferred knowledge or formed the suspicion of wrongdoing. |
| 55002ba26c7a-1c7d-4e4f-be05-a06b9649b987 | Not Translated (0%) | As soon as certainty or reasonable cause to suspect is established, the firm must (1) freeze the designated person’s assets, (2) make the assets unavailable to the designated person or for that person’s benefit, and (3) not deal with the assets (avoid “dealing in funds”). | As soon as certainty or reasonable cause to suspect is established, the firm must (1) freeze the designated person’s assets, (2) make the assets unavailable to the designated person or for that person’s benefit, and (3) not deal with the assets (avoid “dealing in funds”). |
| 55012ba26c7a-1c7d-4e4f-be05-a06b9649b987 | Not Translated (0%) | This is the procedure that must be followed unless there is a reliable exemption in the legislation, the investigator has a license from the Office of Financial Sanctions Implementation (OFSI), and the investigator reports the individual to OFSI. | This is the procedure that must be followed unless there is a reliable exemption in the legislation, the investigator has a license from the Office of Financial Sanctions Implementation (OFSI), and the investigator reports the individual to OFSI. |
| 5502bee95007-2cf3-428b-a02d-93bb3318b5bf | Not Translated (0%) | The Netherlands has its own requirements regarding freezing a customer’s assets. | The Netherlands has its own requirements regarding freezing a customer’s assets. |
| 5503bee95007-2cf3-428b-a02d-93bb3318b5bf | Not Translated (0%) | This next example is taken from the Dutch Central Bank (DNB)’s Guidance on the Anti-Money Laundering and Counter-Terrorist Financing Act and the Sanctions Act. | This next example is taken from the Dutch Central Bank (DNB)’s Guidance on the Anti-Money Laundering and Counter-Terrorist Financing Act and the Sanctions Act. |
| 5504bee95007-2cf3-428b-a02d-93bb3318b5bf | Not Translated (0%) | The Netherlands case is a reminder that many types of companies need to impose sanctions restrictions—not only banks. | The Netherlands case is a reminder that many types of companies need to impose sanctions restrictions—not only banks. |
| 5505bee95007-2cf3-428b-a02d-93bb3318b5bf | Not Translated (0%) | Insurance companies, for example, also need to comply with sanctions regulations. | Insurance companies, for example, also need to comply with sanctions regulations. |
| 550696cbc57d-fef3-47c1-a70a-633e5794d178 | Not Translated (0%) | Imagine an insurance company has issued a third-party liability policy that will pay compensation to someone injured in an automobile accident. | Imagine an insurance company has issued a third-party liability policy that will pay compensation to someone injured in an automobile accident. |
| 550796cbc57d-fef3-47c1-a70a-633e5794d178 | Not Translated (0%) | If the accident were to occur, the insurance company would need to ensure the beneficiary was not a designated person on a sanctions list. | If the accident were to occur, the insurance company would need to ensure the beneficiary was not a designated person on a sanctions list. |
| 550896cbc57d-fef3-47c1-a70a-633e5794d178 | Not Translated (0%) | If the beneficiary is a designated person, the insurance company needs to freeze that person’s assets (the insurance compensation due under the terms of the policy), and make no payment. | If the beneficiary is a designated person, the insurance company needs to freeze that person’s assets (the insurance compensation due under the terms of the policy), and make no payment. |
| 550996cbc57d-fef3-47c1-a70a-633e5794d178 | Not Translated (0%) | Then, the insurer needs to notify the regulator about the frozen assets, and keep the assets frozen in a separate account until the insurer receives further notice from the regulator. | Then, the insurer needs to notify the regulator about the frozen assets, and keep the assets frozen in a separate account until the insurer receives further notice from the regulator. |
| 551096cbc57d-fef3-47c1-a70a-633e5794d178 | Not Translated (0%) | In brief, the system in the Netherlands looks like this: | In brief, the system in the Netherlands looks like this: |
| 5511b9e3f878-7ac2-4649-bbea-eb7f971a83f2 | Not Translated (0%) | The assets of customers identified as designated persons must be frozen immediately and remain frozen either until the relevant sanction is changed and the obligation to freeze the assets lifted, or an exemption is granted, or a notice to the contrary is received from the Ministry of Finance or the supervisory authorities. | The assets of customers identified as designated persons must be frozen immediately and remain frozen either until the relevant sanction is changed and the obligation to freeze the assets lifted, or an exemption is granted, or a notice to the contrary is received from the Ministry of Finance or the supervisory authorities. |
| 5512b9e3f878-7ac2-4649-bbea-eb7f971a83f2 | Not Translated (0%) | Until and unless notice is received from the regulator, keep the funds frozen. | Until and unless notice is received from the regulator, keep the funds frozen. |
| 55131d19f60d-4077-4496-b581-d9c1b206ae64 | Not Translated (0%) | All hits must be reported to the relevant supervisory authority (De Nederlandsche Bank [DNB] or the Dutch Authority for the Financial Markets [AFM]). | All hits must be reported to the relevant supervisory authority (De Nederlandsche Bank [DNB] or the Dutch Authority for the Financial Markets [AFM]). |
| 551442850634-0822-4805-9eff-3b342d6919cc | Not Translated (0%) | The supervisor then assesses the report, and if the hit is confirmed, reports it to the Ministry of Finance. | The supervisor then assesses the report, and if the hit is confirmed, reports it to the Ministry of Finance. |
| 5515199447c8-c390-4c7a-a052-414515597e4a | Not Translated (0%) | Disclosure to Target Party | Disclosure to Target Party |
| 5516cd94a1c2-68aa-41bb-b674-97f96edbdd21 | Not Translated (0%) | Sanctions legislation generally does not prohibit financial institutions from telling sanctions targets that their assets have been frozen. | Sanctions legislation generally does not prohibit financial institutions from telling sanctions targets that their assets have been frozen. |
| 5517cd94a1c2-68aa-41bb-b674-97f96edbdd21 | Not Translated (0%) | It is more likely that customers would learn that they no longer had access to their funds when they attempted to access the funds for some purpose. | It is more likely that customers would learn that they no longer had access to their funds when they attempted to access the funds for some purpose. |
| 5518cd94a1c2-68aa-41bb-b674-97f96edbdd21 | Not Translated (0%) | Credit cards would be declined, deposits would go unmade, accounts would be blocked, and so on. | Credit cards would be declined, deposits would go unmade, accounts would be blocked, and so on. |
| 5519cd94a1c2-68aa-41bb-b674-97f96edbdd21 | Not Translated (0%) | However, because transactions involving sanctions targets could also involve AML regulations, financial institutions should have controls in place to maintain confidentiality around investigations and reporting. | However, because transactions involving sanctions targets could also involve AML regulations, financial institutions should have controls in place to maintain confidentiality around investigations and reporting. |
| 5520035021be-f43b-4e03-a8ad-47437265b97f | Not Translated (0%) | Reporting Requirements for Frozen Assets | Reporting Requirements for Frozen Assets |
| 552110d5514d-ea28-45d8-8c1f-65dcd62d49ca | Not Translated (0%) | Reporting requirements for frozen assets also vary from jurisdiction to jurisdiction, so it is critical that all team members at a financial institution be adequately trained in this area. | Reporting requirements for frozen assets also vary from jurisdiction to jurisdiction, so it is critical that all team members at a financial institution be adequately trained in this area. |
| 552210d5514d-ea28-45d8-8c1f-65dcd62d49ca | Not Translated (0%) | It is imperative that all regulatory timelines and procedures be respected. | It is imperative that all regulatory timelines and procedures be respected. |
| 552310d5514d-ea28-45d8-8c1f-65dcd62d49ca | Not Translated (0%) | Failure to meet these requirements can result in penalties to the financial institution and charges against responsible individuals. | Failure to meet these requirements can result in penalties to the financial institution and charges against responsible individuals. |
| 552410d5514d-ea28-45d8-8c1f-65dcd62d49ca | Not Translated (0%) | Besides routine training, it is essential to research and understand the requirements that apply to the business where assets have been frozen in compliance with a specific sanctions restriction. | Besides routine training, it is essential to research and understand the requirements that apply to the business where assets have been frozen in compliance with a specific sanctions restriction. |
| 552584b2d99f-d29b-4f43-b69e-743c39a6848f | Not Translated (0%) | There are two common reporting schedules, and they often exist side by side: initial reporting requirements, and periodic reporting requirements. | There are two common reporting schedules, and they often exist side by side: initial reporting requirements, and periodic reporting requirements. |
| 552684b2d99f-d29b-4f43-b69e-743c39a6848f | Not Translated (0%) | Initial reporting occurs immediately at the time funds are identified and a freeze is activated. | Initial reporting occurs immediately at the time funds are identified and a freeze is activated. |
| 552784b2d99f-d29b-4f43-b69e-743c39a6848f | Not Translated (0%) | This report usually includes providing the regulatory body with a detailed breakdown of the financial institution’s exposure to the sanctions target. | This report usually includes providing the regulatory body with a detailed breakdown of the financial institution’s exposure to the sanctions target. |
| 552884b2d99f-d29b-4f43-b69e-743c39a6848f | Not Translated (0%) | To prepare this report properly, it is necessary to look up and follow the instructions provided by the regulatory authority supervising the institution. | To prepare this report properly, it is necessary to look up and follow the instructions provided by the regulatory authority supervising the institution. |
| 552984b2d99f-d29b-4f43-b69e-743c39a6848f | Not Translated (0%) | OFAC requires initial reports to be made within 10 business days. | OFAC requires initial reports to be made within 10 business days. |
| 553084b2d99f-d29b-4f43-b69e-743c39a6848f | Not Translated (0%) | Integrated services providers may issue a report automatically in line with enforceable regulations, but it’s necessary to verify the accuracy of the document before transmission to the competent authority. | Integrated services providers may issue a report automatically in line with enforceable regulations, but it’s necessary to verify the accuracy of the document before transmission to the competent authority. |
| 553184b2d99f-d29b-4f43-b69e-743c39a6848f | Not Translated (0%) | A procedure should be in place in the institution for how to proceed. | A procedure should be in place in the institution for how to proceed. |
| 553284b2d99f-d29b-4f43-b69e-743c39a6848f | Not Translated (0%) | In case of doubt, or if any clarification is needed, the appropriate unit in the bank (such as the regulatory liaison office), a unit in the compliance or legal department, or a specialized unit of the audit and reporting function should be contacted. | In case of doubt, or if any clarification is needed, the appropriate unit in the bank (such as the regulatory liaison office), a unit in the compliance or legal department, or a specialized unit of the audit and reporting function should be contacted. |
| 5533dfb4df91-c07e-4a5e-b775-11db4be2e3d6 | Not Translated (0%) | In addition to initial reporting requirements, many jurisdictions require annual or quarterly reports from the financial institution. | In addition to initial reporting requirements, many jurisdictions require annual or quarterly reports from the financial institution. |
| 5534dfb4df91-c07e-4a5e-b775-11db4be2e3d6 | Not Translated (0%) | OFAC requires annual reports. | OFAC requires annual reports. |
| 5535dfb4df91-c07e-4a5e-b775-11db4be2e3d6 | Not Translated (0%) | These reports provide a summary of the assets the firm is holding in compliance with specific sanctions restrictions and how the assets have been segregated. | These reports provide a summary of the assets the firm is holding in compliance with specific sanctions restrictions and how the assets have been segregated. |
| 5536dfb4df91-c07e-4a5e-b775-11db4be2e3d6 | Not Translated (0%) | As with the initial report, it is necessary to check with the regulatory authority in the particular jurisdiction to ensure the report meets all of that jurisdiction’s requirements. | As with the initial report, it is necessary to check with the regulatory authority in the particular jurisdiction to ensure the report meets all of that jurisdiction’s requirements. |
| 5537559f8011-abd9-4d24-a075-f1a6c0ff3861 | Not Translated (0%) | Remember: | Remember: |
| 5538559f8011-abd9-4d24-a075-f1a6c0ff3861 | Not Translated (0%) | Reporting requirements are just that—regulatory requirements. | Reporting requirements are just that—regulatory requirements. |
| 5539559f8011-abd9-4d24-a075-f1a6c0ff3861 | Not Translated (0%) | Compliance is mandatory and noncompliance can lead to heavy penalties for the institutions as well as the employees who are responsible for any noncompliance. | Compliance is mandatory and noncompliance can lead to heavy penalties for the institutions as well as the employees who are responsible for any noncompliance. |
| 5540559f8011-abd9-4d24-a075-f1a6c0ff3861 | Not Translated (0%) | Everyone on board needs to be trained and stay current on reporting requirements. | Everyone on board needs to be trained and stay current on reporting requirements. |
| 55415b2a2de4-885c-4837-94d7-365390a9bd3a | Not Translated (0%) | Managing Frozen Assets | Managing Frozen Assets |
| 55425aa9a3ad-30af-4106-9806-1b3eccc540a2 | Not Translated (0%) | Now that the firm has successfully frozen the sanctions target’s assets, the firm is responsible for managing those assets in a way that aligns with regulatory requirements. | Now that the firm has successfully frozen the sanctions target’s assets, the firm is responsible for managing those assets in a way that aligns with regulatory requirements. |
| 55435aa9a3ad-30af-4106-9806-1b3eccc540a2 | Not Translated (0%) | For example, most jurisdictions allow financial institutions holding frozen assets to add interest to a frozen interest-bearing account, but some require a license to charge interest to a frozen account that would normally have interest charged (for example, a loan or credit card)—this is the practice in the European Union, according to its Best Practices Paper on Sanctions. | For example, most jurisdictions allow financial institutions holding frozen assets to add interest to a frozen interest-bearing account, but some require a license to charge interest to a frozen account that would normally have interest charged (for example, a loan or credit card)—this is the practice in the European Union, according to its Best Practices Paper on Sanctions. |
| 55445aa9a3ad-30af-4106-9806-1b3eccc540a2 | Not Translated (0%) | The European Union does not require firms to place frozen assets in an interest-bearing account, unlike OFAC in the United States. | The European Union does not require firms to place frozen assets in an interest-bearing account, unlike OFAC in the United States. |
| 55455aa9a3ad-30af-4106-9806-1b3eccc540a2 | Not Translated (0%) | Funds frozen under OFAC sanctions must be placed in an interest-bearing account, and interest is commonly applied at a commercially reasonable rate. | Funds frozen under OFAC sanctions must be placed in an interest-bearing account, and interest is commonly applied at a commercially reasonable rate. |
| 55465aa9a3ad-30af-4106-9806-1b3eccc540a2 | Not Translated (0%) | In fact, some financial institutions in the United States (and elsewhere, as permitted) set up automated systems to apply interest to blocked accounts without any need to remove blocking controls, even temporarily. | In fact, some financial institutions in the United States (and elsewhere, as permitted) set up automated systems to apply interest to blocked accounts without any need to remove blocking controls, even temporarily. |
| 55475aa9a3ad-30af-4106-9806-1b3eccc540a2 | Not Translated (0%) | Like in many other countries, OFAC provides helpful publications, insight, and advice on these matters. | Like in many other countries, OFAC provides helpful publications, insight, and advice on these matters. |
| 55485aa9a3ad-30af-4106-9806-1b3eccc540a2 | Not Translated (0%) | In those jurisdictions with no requirement to hold frozen funds in interest-bearing accounts, some financial institutions simply block or freeze the accounts and make no interest payments until the matter is resolved and the regulatory authority issues instructions on what interest, if any, is due. | In those jurisdictions with no requirement to hold frozen funds in interest-bearing accounts, some financial institutions simply block or freeze the accounts and make no interest payments until the matter is resolved and the regulatory authority issues instructions on what interest, if any, is due. |
| 55496406a891-2341-44a0-bd10-08f35cf086ea | Not Translated (0%) | You have learned a bit about managing routine interest payments to frozen accounts; now, consider how to manage routine fees that might be charged against these funds. | You have learned a bit about managing routine interest payments to frozen accounts; now, consider how to manage routine fees that might be charged against these funds. |
| 55506406a891-2341-44a0-bd10-08f35cf086ea | Not Translated (0%) | In most cases, financial institutions are legally allowed to debit frozen accounts for normal business charges. | In most cases, financial institutions are legally allowed to debit frozen accounts for normal business charges. |
| 55516406a891-2341-44a0-bd10-08f35cf086ea | Not Translated (0%) | The simplest example might be a checking account that charges a monthly fee; if this account were frozen, the bank could still charge the customer the service fee each month. | The simplest example might be a checking account that charges a monthly fee; if this account were frozen, the bank could still charge the customer the service fee each month. |
| 55526406a891-2341-44a0-bd10-08f35cf086ea | Not Translated (0%) | In the European Union, charges such as these can almost always be deducted without first obtaining a license, as long as the bank can demonstrate that the charges are commercially reasonable. | In the European Union, charges such as these can almost always be deducted without first obtaining a license, as long as the bank can demonstrate that the charges are commercially reasonable. |
| 55536406a891-2341-44a0-bd10-08f35cf086ea | Not Translated (0%) | As always, the specifics of which charges are permissible and which are not varies from situation to situation, so it is necessary to research what laws apply in each particular case in order to manage frozen assets appropriately. | As always, the specifics of which charges are permissible and which are not varies from situation to situation, so it is necessary to research what laws apply in each particular case in order to manage frozen assets appropriately. |
| 55546406a891-2341-44a0-bd10-08f35cf086ea | Not Translated (0%) | OFAC regulations generally allow banks to debit blocked accounts for normal service charges in accordance with the published rate schedule for the type of account in question. | OFAC regulations generally allow banks to debit blocked accounts for normal service charges in accordance with the published rate schedule for the type of account in question. |
| 5555e0783eaa-6acb-4e8c-9017-05411990f223 | Not Translated (0%) | MANAGING FROZEN ASSETS: | MANAGING FROZEN ASSETS: |
| 5556e0783eaa-6acb-4e8c-9017-05411990f223 | Not Translated (0%) | ERRORS, ERRONEOUS ASSUMPTIONS, AND CHALLENGES | ERRORS, ERRONEOUS ASSUMPTIONS, AND CHALLENGES |
| 55573215c9cb-1b7b-4ea0-bb92-129cf4d5b15e | Not Translated (0%) | Managing frozen assets is a task requiring special attention, as it must follow a detailed set of rules and regulations that vary over time and from jurisdiction to jurisdiction. | Managing frozen assets is a task requiring special attention, as it must follow a detailed set of rules and regulations that vary over time and from jurisdiction to jurisdiction. |
| 55583215c9cb-1b7b-4ea0-bb92-129cf4d5b15e | Not Translated (0%) | Although much of this work is straightforward, there are a number of common errors, erroneous assumptions, and challenges. | Although much of this work is straightforward, there are a number of common errors, erroneous assumptions, and challenges. |
| 55593215c9cb-1b7b-4ea0-bb92-129cf4d5b15e | Not Translated (0%) | Some of these errors and inaccurate assumptions can be overcome by heeding the following advice: | Some of these errors and inaccurate assumptions can be overcome by heeding the following advice: |
| 55605bd97fda-712c-4317-ad49-6e8924603f76 | Not Translated (0%) | Pay close attention to exactly what type of payment is being credited to an account. | Pay close attention to exactly what type of payment is being credited to an account. |
| 55615bd97fda-712c-4317-ad49-6e8924603f76 | Not Translated (0%) | For example, interest is handled differently from dividends. | For example, interest is handled differently from dividends. |
| 5562cb9050c7-f0fd-4beb-8df0-f4557de46748 | Not Translated (0%) | Likewise, you should be sure you understand what type of charge is being made against the account, and whether or not a license (general or specific) is needed. | Likewise, you should be sure you understand what type of charge is being made against the account, and whether or not a license (general or specific) is needed. |
| 5563655b7d04-9767-42c9-a18e-c1f3ec303a55 | Not Translated (0%) | You should always make sure you have updated information on a sanction’s restrictions in relation to the assets that must be frozen, assets that are exempt from freezing, and so on. | You should always make sure you have updated information on a sanction’s restrictions in relation to the assets that must be frozen, assets that are exempt from freezing, and so on. |
| 5564655b7d04-9767-42c9-a18e-c1f3ec303a55 | Not Translated (0%) | New restrictions could be imposed or lifted on short notice; if there is a change in restrictions, you must make sure you follow the procedure mandated by your regulator. | New restrictions could be imposed or lifted on short notice; if there is a change in restrictions, you must make sure you follow the procedure mandated by your regulator. |
| 5565655b7d04-9767-42c9-a18e-c1f3ec303a55 | Not Translated (0%) | For instance, if assets owned by one of the customers are no longer subject to a freeze, do you need to inform the customer, or must you obtain clearance from the regulator of the jurisdiction first? | For instance, if assets owned by one of the customers are no longer subject to a freeze, do you need to inform the customer, or must you obtain clearance from the regulator of the jurisdiction first? |
| 5566b10d5650-859e-4674-a20d-576d42919bdf | Not Translated (0%) | Pay close attention to OFAC’s 50 Percent Rule and the specific application outlined in FAQ 402 of OFAC’s FAQ website. | Pay close attention to OFAC’s 50 Percent Rule and the specific application outlined in FAQ 402 of OFAC’s FAQ website. |
| 5567b10d5650-859e-4674-a20d-576d42919bdf | Not Translated (0%) | Entities in which the aggregate of one or more blocked persons’ ownership stakes has dropped to below 50% are not considered blocked under this rule. | Entities in which the aggregate of one or more blocked persons’ ownership stakes has dropped to below 50% are not considered blocked under this rule. |
| 5568b10d5650-859e-4674-a20d-576d42919bdf | Not Translated (0%) | If this property comes into the United States or the possession or control of a US person while the aggregate of one or more blocked persons’ ownership stakes is below 50%, it is not considered blocked. | If this property comes into the United States or the possession or control of a US person while the aggregate of one or more blocked persons’ ownership stakes is below 50%, it is not considered blocked. |
| 5569b10d5650-859e-4674-a20d-576d42919bdf | Not Translated (0%) | OFAC “urges caution when dealing with or processing transactions involving such entities, as those entities may become the subject of future designations or enforcement actions by OFAC. | OFAC “urges caution when dealing with or processing transactions involving such entities, as those entities may become the subject of future designations or enforcement actions by OFAC. |
| 5570b10d5650-859e-4674-a20d-576d42919bdf | Not Translated (0%) | Sufficient due diligence should be conducted to determine that any purported divestment in fact occurred and that the transfer of ownership interests was not merely a sham transaction.” | Sufficient due diligence should be conducted to determine that any purported divestment in fact occurred and that the transfer of ownership interests was not merely a sham transaction.” |
| 5571b10d5650-859e-4674-a20d-576d42919bdf | Not Translated (0%) | Blocked property of an entity owned 50% or more by a single blocked person that comes within the United States or within the possession or control of a US person stays blocked unless OFAC authorizes unblocking or other dealings in the property, or OFAC removes the person from the SDN List. | Blocked property of an entity owned 50% or more by a single blocked person that comes within the United States or within the possession or control of a US person stays blocked unless OFAC authorizes unblocking or other dealings in the property, or OFAC removes the person from the SDN List. |
| 5572b10d5650-859e-4674-a20d-576d42919bdf | Not Translated (0%) | The property stays blocked even if the blocked person’s ownership does later fall below 50%, because the person is considered to have an interest in the blocked property. | The property stays blocked even if the blocked person’s ownership does later fall below 50%, because the person is considered to have an interest in the blocked property. |
| 5573b10d5650-859e-4674-a20d-576d42919bdf | Not Translated (0%) | OFAC “does not recognize the unlicensed transfer of the blocked person’s interest after the property becomes blocked in the United States or in the possession or control of a US person.” | OFAC “does not recognize the unlicensed transfer of the blocked person’s interest after the property becomes blocked in the United States or in the possession or control of a US person.” |
| 5574b10d5650-859e-4674-a20d-576d42919bdf | Not Translated (0%) | In the case of blocked property of an entity owned 50% or more in the aggregate by more than one blocked person, it will stay blocked unless OFAC authorizes the unblocking of or other dealings in the property or removes one or more of the blocked persons from the SDN List to make aggregate ownership by blocked persons fall below 50 percent. | In the case of blocked property of an entity owned 50% or more in the aggregate by more than one blocked person, it will stay blocked unless OFAC authorizes the unblocking of or other dealings in the property or removes one or more of the blocked persons from the SDN List to make aggregate ownership by blocked persons fall below 50 percent. |
| 557556bb8be4-6ae3-4f47-ae80-f95b0e1537b8 | Not Translated (0%) | US Department of the Treasury, OFAC FAQs: | US Department of the Treasury, OFAC FAQs: |
| 557656bb8be4-6ae3-4f47-ae80-f95b0e1537b8 | Not Translated (0%) | General Questions, 2019. | General Questions, 2019. |
| 5577bf21eea8-3b3f-4de1-9106-70f2e7cd795b | Not Translated (0%) | Unfortunately, the process of freezing assets—and then managing those assets—features certain built-in operational challenges. | Unfortunately, the process of freezing assets—and then managing those assets—features certain built-in operational challenges. |
| 5578bf21eea8-3b3f-4de1-9106-70f2e7cd795b | Not Translated (0%) | These challenges include locating the assets, determining whether they can be linked to the target, operating with multiple jurisdictions simultaneously, and shouldering the cost of asset management and maintenance. | These challenges include locating the assets, determining whether they can be linked to the target, operating with multiple jurisdictions simultaneously, and shouldering the cost of asset management and maintenance. |
| 5579bf21eea8-3b3f-4de1-9106-70f2e7cd795b | Not Translated (0%) | In some cases, only a portion of a customer’s assets is subject to freezing, which will require the segregation of those assets. | In some cases, only a portion of a customer’s assets is subject to freezing, which will require the segregation of those assets. |
| 5580bf21eea8-3b3f-4de1-9106-70f2e7cd795b | Not Translated (0%) | Consider the following challenges: | Consider the following challenges: |
| 5581d0e3732d-270f-49a8-930e-cf0e7dac50d4 | Not Translated (0%) | Locating assets and funds belonging directly or indirectly to the sanctions target can be difficult, especially if there are accounts in multiple branches of the firm or accounts held through complex ownership structures. | Locating assets and funds belonging directly or indirectly to the sanctions target can be difficult, especially if there are accounts in multiple branches of the firm or accounts held through complex ownership structures. |
| 5582778b9a8d-27a6-4a29-9ad8-7bf5cede85ca | Not Translated (0%) | Global organizations use different systems and databases for different products and service lines. | Global organizations use different systems and databases for different products and service lines. |
| 5583041c3d0f-eb31-4eb0-9358-e56c343f4640 | Not Translated (0%) | Freezing requirements vary across jurisdictions, and in some cases local legislation may not have the same requirements as other applicable sanctions regimes in other countries. | Freezing requirements vary across jurisdictions, and in some cases local legislation may not have the same requirements as other applicable sanctions regimes in other countries. |
| 5584b092a069-bffa-40dd-9a50-df3fe41e60c5 | Not Translated (0%) | The cost of managing and maintaining frozen assets can be significant. | The cost of managing and maintaining frozen assets can be significant. |
| 5585b092a069-bffa-40dd-9a50-df3fe41e60c5 | Not Translated (0%) | For example, these expenses could include additional monitoring and reporting staff, technical controls to flag any attempts to deal in funds, and the time required by the compliance team to identify and locate assets and report its findings to the proper authorities in the proper manner. | For example, these expenses could include additional monitoring and reporting staff, technical controls to flag any attempts to deal in funds, and the time required by the compliance team to identify and locate assets and report its findings to the proper authorities in the proper manner. |
| 55865fee63ab-db3b-44ed-848d-921f7593abfe | Not Translated (0%) | Dealing in Funds | Dealing in Funds |
| 55878c382561-2a3f-4a33-9568-31375b527b45 | Not Translated (0%) | Frozen assets need to be segregated. | Frozen assets need to be segregated. |
| 55888c382561-2a3f-4a33-9568-31375b527b45 | Not Translated (0%) | Asset-freezing restrictions require that the institutions holding frozen assets not deal in funds. | Asset-freezing restrictions require that the institutions holding frozen assets not deal in funds. |
| 55898c382561-2a3f-4a33-9568-31375b527b45 | Not Translated (0%) | Dealing in funds includes moving, transferring, altering, using, or accessing funds. | Dealing in funds includes moving, transferring, altering, using, or accessing funds. |
| 55908c382561-2a3f-4a33-9568-31375b527b45 | Not Translated (0%) | It also includes dealing with funds in any way that would result in any change to their volume, amount, location, ownership, possession, character, destination, or other change that would enable the funds to be used, including portfolio management. | It also includes dealing with funds in any way that would result in any change to their volume, amount, location, ownership, possession, character, destination, or other change that would enable the funds to be used, including portfolio management. |
| 55915ff4856e-1445-499b-8e8d-6d3bc3e957e3 | Not Translated (0%) | Confiscation, Seizure, and Forfeiture of Assets | Confiscation, Seizure, and Forfeiture of Assets |
| 5592642f7d04-75c1-497d-ada8-e8b1c936c878 | Not Translated (0%) | Confiscation, seizure, and forfeiture of assets might seem similar to freezing or blocking a customer’s access to assets, but there are some fundamental differences. | Confiscation, seizure, and forfeiture of assets might seem similar to freezing or blocking a customer’s access to assets, but there are some fundamental differences. |
| 5593642f7d04-75c1-497d-ada8-e8b1c936c878 | Not Translated (0%) | As we know, when assets are frozen or blocked, the target cannot control them while the sanctions are in effect; however, the target still owns the frozen assets, and once the sanctions are lifted, the target will be able to access the assets. | As we know, when assets are frozen or blocked, the target cannot control them while the sanctions are in effect; however, the target still owns the frozen assets, and once the sanctions are lifted, the target will be able to access the assets. |
| 5594642f7d04-75c1-497d-ada8-e8b1c936c878 | Not Translated (0%) | This is materially different from civil and criminal confiscation, seizure, or forfeiture of assets. | This is materially different from civil and criminal confiscation, seizure, or forfeiture of assets. |
| 5595c2b02821-16a7-4372-af82-2bd99a73836f | Not Translated (0%) | Confiscation of assets, which happens after a court order is issued, is generally intended to permanently deprive someone of the proceeds they have generated through criminal activity. | Confiscation of assets, which happens after a court order is issued, is generally intended to permanently deprive someone of the proceeds they have generated through criminal activity. |
| 5596c2b02821-16a7-4372-af82-2bd99a73836f | Not Translated (0%) | Unlike placing a freeze on assets, confiscation of assets is not driven by sanctions. | Unlike placing a freeze on assets, confiscation of assets is not driven by sanctions. |
| 55974eac1b75-dfd5-499c-8633-f4621dd0c5c5 | Not Translated (0%) | Seizure of assets happens before a court order is issued. | Seizure of assets happens before a court order is issued. |
| 55984eac1b75-dfd5-499c-8633-f4621dd0c5c5 | Not Translated (0%) | Asset seizures occur when law enforcement agencies take control of assets they identify as being the proceeds of criminal activity. | Asset seizures occur when law enforcement agencies take control of assets they identify as being the proceeds of criminal activity. |
| 55993fd6ac9b-ac08-41a2-972b-ba00ad601cb4 | Not Translated (0%) | Civil asset forfeiture, which is similar to asset seizure, is an important tool to help law enforcement agencies defund organized crime and prevent the commission of new crimes. | Civil asset forfeiture, which is similar to asset seizure, is an important tool to help law enforcement agencies defund organized crime and prevent the commission of new crimes. |
| 56003fd6ac9b-ac08-41a2-972b-ba00ad601cb4 | Not Translated (0%) | In civil asset forfeiture, assets unrelated to the commission of a crime can be taken from the individual accused of committing a crime. | In civil asset forfeiture, assets unrelated to the commission of a crime can be taken from the individual accused of committing a crime. |
| 5601b632cb46-0e6f-47f4-9eb9-62001ea53ee8 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 5602b632cb46-0e6f-47f4-9eb9-62001ea53ee8 | Not Translated (0%) | MR. | MR. |
| 5603b632cb46-0e6f-47f4-9eb9-62001ea53ee8 | Not Translated (0%) | EZZ, 2011 | EZZ, 2011 |
| 560478dce4d7-1f8e-4c59-9faf-0c439f5fa6f9 | Not Translated (0%) | CASE SUMMARY | CASE SUMMARY |
| 560599925c44-ebee-4318-9180-eba9935a90af | Not Translated (0%) | The interesting case of Mr. Ahmed Ezz, a former member of the Egyptian government under the Mubarak regime, involved both assets freezing and a confiscation order. | The interesting case of Mr. Ahmed Ezz, a former member of the Egyptian government under the Mubarak regime, involved both assets freezing and a confiscation order. |
| 560699925c44-ebee-4318-9180-eba9935a90af | Not Translated (0%) | The case began in 2011, during the Arab Spring uprisings, when Mr. Ezz was among the individuals named on sanctions lists by the European Union. | The case began in 2011, during the Arab Spring uprisings, when Mr. Ezz was among the individuals named on sanctions lists by the European Union. |
| 560799925c44-ebee-4318-9180-eba9935a90af | Not Translated (0%) | Mr. Ezz was suspected of having stolen funds belonging to the Egyptian government, and the sanctions restrictions required his assets to be frozen. | Mr. Ezz was suspected of having stolen funds belonging to the Egyptian government, and the sanctions restrictions required his assets to be frozen. |
| 56086df3ee27-5c81-47f0-a113-d4295f133df3 | Not Translated (0%) | At the same time, the Egyptian government began taking legal steps to recover the assets that Mr. Ezz had transferred out of Egypt for his personal benefit. | At the same time, the Egyptian government began taking legal steps to recover the assets that Mr. Ezz had transferred out of Egypt for his personal benefit. |
| 56096df3ee27-5c81-47f0-a113-d4295f133df3 | Not Translated (0%) | Criminal confiscation proceedings began in Egypt in an attempt to recover funds Mr. Ezz held in Egypt, Switzerland, and the European Union. | Criminal confiscation proceedings began in Egypt in an attempt to recover funds Mr. Ezz held in Egypt, Switzerland, and the European Union. |
| 56106df3ee27-5c81-47f0-a113-d4295f133df3 | Not Translated (0%) | These assets included funds held in bank accounts in each country, and the order issued by the courts in this case would have prevented Mr. Ezz from accessing the funds, and sought to remove the assets from Mr. Ezz so that he could no longer access or use them. | These assets included funds held in bank accounts in each country, and the order issued by the courts in this case would have prevented Mr. Ezz from accessing the funds, and sought to remove the assets from Mr. Ezz so that he could no longer access or use them. |
| 561197b936ae-c209-4b1f-92a3-849e478bc1fa | Not Translated (0%) | Banks in Switzerland and the European Union had to freeze Mr. Ezz’s assets, while the Egyptian government simultaneously sought to confiscate Mr. Ezz’s assets in all three jurisdictions. | Banks in Switzerland and the European Union had to freeze Mr. Ezz’s assets, while the Egyptian government simultaneously sought to confiscate Mr. Ezz’s assets in all three jurisdictions. |
| 561297b936ae-c209-4b1f-92a3-849e478bc1fa | Not Translated (0%) | Under Article 305 of the Swiss Criminal Code, Switzerland is obligated to freeze all money that raises suspicions of being laundered. | Under Article 305 of the Swiss Criminal Code, Switzerland is obligated to freeze all money that raises suspicions of being laundered. |
| 561397b936ae-c209-4b1f-92a3-849e478bc1fa | Not Translated (0%) | Since 2011, Egypt has asked Switzerland to freeze the assets of several Egyptians, including former President Hosni Mubarak, his sons, and his close circle (including Ezz), over charges of corruption and money laundering. | Since 2011, Egypt has asked Switzerland to freeze the assets of several Egyptians, including former President Hosni Mubarak, his sons, and his close circle (including Ezz), over charges of corruption and money laundering. |
| 561497b936ae-c209-4b1f-92a3-849e478bc1fa | Not Translated (0%) | At the time, banks in the European Union had to conform to regulations from both their national banking supervisors and rules from the EU. | At the time, banks in the European Union had to conform to regulations from both their national banking supervisors and rules from the EU. |
| 561597b936ae-c209-4b1f-92a3-849e478bc1fa | Not Translated (0%) | A number of jurisdictions, each with its own powers, were involved, which created a complex situation of overlapping and sometimes contradictory court decisions. | A number of jurisdictions, each with its own powers, were involved, which created a complex situation of overlapping and sometimes contradictory court decisions. |
| 5616dbba07e3-5fbf-453e-bf6e-d3da479839e1 | Not Translated (0%) | KEY TAKEAWAYS | KEY TAKEAWAYS |
| 5617cd40fdc5-743d-4ad5-9a44-156e94fae7ff | Not Translated (0%) | In early 2018, at the end of a complex process, the Swiss authorities handed Egypt 33.8 million Swiss francs ($24.2 million) that were in Ezz’s blocked bank accounts, and the new Egyptian government dropped the charges against Mr. Ezz. | In early 2018, at the end of a complex process, the Swiss authorities handed Egypt 33.8 million Swiss francs ($24.2 million) that were in Ezz’s blocked bank accounts, and the new Egyptian government dropped the charges against Mr. Ezz. |
| 5618cd40fdc5-743d-4ad5-9a44-156e94fae7ff | Not Translated (0%) | The case was then considered as settled. | The case was then considered as settled. |
| 5619756c3edb-5f55-4454-bc8a-2af63fc5b3d8 | Not Translated (0%) | Licenses | Licenses |
| 56203c072d02-e9df-4ec9-9e55-e3e7b16f2340 | Not Translated (0%) | As previously stated in the discussion of freezing assets and dealing in funds, some activities involving frozen assets can be done only with a license. | As previously stated in the discussion of freezing assets and dealing in funds, some activities involving frozen assets can be done only with a license. |
| 56213c072d02-e9df-4ec9-9e55-e3e7b16f2340 | Not Translated (0%) | In this section, some key licensing terms will be defined before we turn our attention to uses of assets that are permissible with a license and the two main types of license: general and specific. | In this section, some key licensing terms will be defined before we turn our attention to uses of assets that are permissible with a license and the two main types of license: general and specific. |
| 5622815872ff-06b1-4cb2-8368-2559a9ef1fdf | Not Translated (0%) | A license is a written authorization issued by a sanctions regulator that permits an activity that otherwise might be prohibited or restricted under a particular sanction. | A license is a written authorization issued by a sanctions regulator that permits an activity that otherwise might be prohibited or restricted under a particular sanction. |
| 5623815872ff-06b1-4cb2-8368-2559a9ef1fdf | Not Translated (0%) | The laws or regulations passed to implement financial sanctions generally include language that allows otherwise prohibited transactions to take place under specific circumstances. | The laws or regulations passed to implement financial sanctions generally include language that allows otherwise prohibited transactions to take place under specific circumstances. |
| 56248abf2254-3861-40fb-8cb4-76b0ef5eeb26 | Not Translated (0%) | The main purpose of the licensing system is to strike an appropriate balance between the risk of assets being used by a sanctions target for restricted activities, and meeting the human rights or basic needs of sanctions targets, or avoiding unintended economic consequences for unrelated industries and parties. | The main purpose of the licensing system is to strike an appropriate balance between the risk of assets being used by a sanctions target for restricted activities, and meeting the human rights or basic needs of sanctions targets, or avoiding unintended economic consequences for unrelated industries and parties. |
| 56258abf2254-3861-40fb-8cb4-76b0ef5eeb26 | Not Translated (0%) | For example, a license may be requested to allow access to frozen funds in order to pay for some of the sanctions target’s basic needs, such as food, rent, legal fees, medical expenses, or other authorized expenses. | For example, a license may be requested to allow access to frozen funds in order to pay for some of the sanctions target’s basic needs, such as food, rent, legal fees, medical expenses, or other authorized expenses. |
| 562623f8b584-cd8c-48c2-b3d9-9d44b5c0c2a3 | Not Translated (0%) | An exemption is a specific description of the circumstances under which an otherwise prohibited activity can be executed under a general license, meaning the persons authorizing the transactions do not necessarily require approval from the licensing agency beforehand. | An exemption is a specific description of the circumstances under which an otherwise prohibited activity can be executed under a general license, meaning the persons authorizing the transactions do not necessarily require approval from the licensing agency beforehand. |
| 562723f8b584-cd8c-48c2-b3d9-9d44b5c0c2a3 | Not Translated (0%) | The regulations written to enact sanctions restrictions will also describe any exemptions to those restrictions. | The regulations written to enact sanctions restrictions will also describe any exemptions to those restrictions. |
| 56282e9afcea-0fee-4472-9c35-1bcb7f818e7f | Not Translated (0%) | The scope of permitted activities refers to exactly which activities are permitted without a license, and which are only permitted with a license. | The scope of permitted activities refers to exactly which activities are permitted without a license, and which are only permitted with a license. |
| 56292e9afcea-0fee-4472-9c35-1bcb7f818e7f | Not Translated (0%) | A license may stipulate that certain activities are only permitted during a certain period (from date A to date B) or during specified seasons. | A license may stipulate that certain activities are only permitted during a certain period (from date A to date B) or during specified seasons. |
| 56302e9afcea-0fee-4472-9c35-1bcb7f818e7f | Not Translated (0%) | For instance, the import of fuel for heating purposes may only be permitted during winter months. | For instance, the import of fuel for heating purposes may only be permitted during winter months. |
| 56312e9afcea-0fee-4472-9c35-1bcb7f818e7f | Not Translated (0%) | The regulations that enact a sanction will outline the grounds and circumstances under which a license is or is not required. | The regulations that enact a sanction will outline the grounds and circumstances under which a license is or is not required. |
| 56322e9afcea-0fee-4472-9c35-1bcb7f818e7f | Not Translated (0%) | (Do not confuse the scope of permitted activities with the scope of licensing.) | (Do not confuse the scope of permitted activities with the scope of licensing.) |
| 5633b662df74-7db5-41ec-aacd-988972f746c3 | Not Translated (0%) | LICENSING TYPES | LICENSING TYPES |
| 56341ac1553a-562e-477b-b4aa-1fc0343a3c84 | Not Translated (0%) | There are two types of licenses: general and specific. | There are two types of licenses: general and specific. |
| 5635522356a3-e446-474c-9c5d-5be6fc6f6c82 | Not Translated (0%) | General licenses authorize a particular type of transaction for a class of persons without the need to apply for a license. | General licenses authorize a particular type of transaction for a class of persons without the need to apply for a license. |
| 5636522356a3-e446-474c-9c5d-5be6fc6f6c82 | Not Translated (0%) | They are usually posted on the sanctions regulator’s website and subscribers are notified of its presence. | They are usually posted on the sanctions regulator’s website and subscribers are notified of its presence. |
| 5637522356a3-e446-474c-9c5d-5be6fc6f6c82 | Not Translated (0%) | General licenses normally authorize basic-needs activities such as the provision of legal aid or insurance services. | General licenses normally authorize basic-needs activities such as the provision of legal aid or insurance services. |
| 5638522356a3-e446-474c-9c5d-5be6fc6f6c82 | Not Translated (0%) | For example, OFAC has issued one or more general licenses under nearly every one of its economic sanctions restrictions. | For example, OFAC has issued one or more general licenses under nearly every one of its economic sanctions restrictions. |
| 563987ec5423-060c-48f8-b04d-806ec0069182 | Not Translated (0%) | Let’s look at an example from the United Kingdom. | Let’s look at an example from the United Kingdom. |
| 5640d4f0bbc0-1938-4421-af5f-e508816c2e0e | Not Translated (0%) | The United Kingdom has issued a small number of general licenses under two of its terrorism-related sanctions restrictions. | The United Kingdom has issued a small number of general licenses under two of its terrorism-related sanctions restrictions. |
| 5641d4f0bbc0-1938-4421-af5f-e508816c2e0e | Not Translated (0%) | These sanctions regimes are the Terrorist and Terrorism Financing under TAFA 2010 and European Council Regulation (EC) No 2580/2001, and the ISIL (Da’esh) and Al-Qaeda organizations and Council Regulation (EC) No 881/2002. | These sanctions regimes are the Terrorist and Terrorism Financing under TAFA 2010 and European Council Regulation (EC) No 2580/2001, and the ISIL (Da’esh) and Al-Qaeda organizations and Council Regulation (EC) No 881/2002. |
| 5642d4f0bbc0-1938-4421-af5f-e508816c2e0e | Not Translated (0%) | The general licenses that apply to these two sanctions regimes, and only in the specific circumstances set out in each license, are: | The general licenses that apply to these two sanctions regimes, and only in the specific circumstances set out in each license, are: |
| 5643035a09e9-70e9-453b-8545-16cd147b4402 | Not Translated (0%) | Provision of insurance (issuing insurance to a sanctions target) | Provision of insurance (issuing insurance to a sanctions target) |
| 564494bae396-1fa4-4960-a7b3-d21f72813063 | Not Translated (0%) | Temporary provisions under insurance policies (allowing certain temporary provisions under insurance policies, such as the use of a courtesy car or providing temporary accommodation) | Temporary provisions under insurance policies (allowing certain temporary provisions under insurance policies, such as the use of a courtesy car or providing temporary accommodation) |
| 564553d37987-9dc3-42f6-b7d1-dbed3e7bed17 | Not Translated (0%) | Legal aid (paying lawyers/solicitors who provide legal aid where advice or representation is sought by the sanctions target) | Legal aid (paying lawyers/solicitors who provide legal aid where advice or representation is sought by the sanctions target) |
| 564670b47a99-128a-4242-a294-6d5a2909e1ad | Not Translated (0%) | Legal expenses paid by a third party (allowing a third party, such as a family member, to pay money to lawyers/solicitors who may be acting for a sanctions target) | Legal expenses paid by a third party (allowing a third party, such as a family member, to pay money to lawyers/solicitors who may be acting for a sanctions target) |
| 5647134e674e-8c1d-4e5b-861d-74e685d70025 | Not Translated (0%) | Specific licenses authorize the undertaking of certain specified activities. | Specific licenses authorize the undertaking of certain specified activities. |
| 5648134e674e-8c1d-4e5b-861d-74e685d70025 | Not Translated (0%) | As is the case with general licenses, the regulations that impose a sanction will generally describe the types of activities for which a license is needed, and regulation guidance notes, instructions, and answers to frequently asked questions provide supplemental information for applicants. | As is the case with general licenses, the regulations that impose a sanction will generally describe the types of activities for which a license is needed, and regulation guidance notes, instructions, and answers to frequently asked questions provide supplemental information for applicants. |
| 5649134e674e-8c1d-4e5b-861d-74e685d70025 | Not Translated (0%) | Specific licenses can set very prescriptive requirements. | Specific licenses can set very prescriptive requirements. |
| 56504c2e2714-a90d-4354-acc3-2db9c51d0e35 | Not Translated (0%) | A person applying for a specific license must provide adequate evidence to support the application and demonstrate that all application criteria have been met. | A person applying for a specific license must provide adequate evidence to support the application and demonstrate that all application criteria have been met. |
| 56514c2e2714-a90d-4354-acc3-2db9c51d0e35 | Not Translated (0%) | The information required for a specific license often includes the following: | The information required for a specific license often includes the following: |
| 5652405b0e81-8cfc-4cb0-b64b-1616a65a83c8 | Not Translated (0%) | Identification information on all parties to the proposed transaction, through signed contract(s) | Identification information on all parties to the proposed transaction, through signed contract(s) |
| 5653cca4a6a6-d6b1-44cd-beb9-1f32428c6721 | Not Translated (0%) | Information on any and all financial institutions involved (remitter, correspondent bank, and beneficiary) | Information on any and all financial institutions involved (remitter, correspondent bank, and beneficiary) |
| 5654c079a1df-d56b-4b01-9098-3227f4f505b7 | Not Translated (0%) | Identification information on the beneficiary of goods | Identification information on the beneficiary of goods |
| 565596aead46-8255-45a3-b71f-e2b0ece8255c | Not Translated (0%) | Details on the account(s) involved | Details on the account(s) involved |
| 56568e98f3a8-5ef0-4acb-94ac-b92d0d852290 | Not Translated (0%) | Amount of the proposed transaction | Amount of the proposed transaction |
| 5657f90e68a0-899a-41b5-afce-119959d85787 | Not Translated (0%) | Remember, of course, that each regulator has slightly different requirements, so it is imperative that the requirements are checked for every application before submitting it. | Remember, of course, that each regulator has slightly different requirements, so it is imperative that the requirements are checked for every application before submitting it. |
| 56583d8fc57f-babb-4332-bb79-a611f0496f16 | Not Translated (0%) | Finally, a specific license is not transferable, and is limited to the facts and circumstances identified in the application. | Finally, a specific license is not transferable, and is limited to the facts and circumstances identified in the application. |
| 56593d8fc57f-babb-4332-bb79-a611f0496f16 | Not Translated (0%) | The onus is on the applicant to show that all application criteria have been met. | The onus is on the applicant to show that all application criteria have been met. |
| 56603d8fc57f-babb-4332-bb79-a611f0496f16 | Not Translated (0%) | All other restrictions imposed under the sanction’s regulations remain in full effect. | All other restrictions imposed under the sanction’s regulations remain in full effect. |
| 56613d8fc57f-babb-4332-bb79-a611f0496f16 | Not Translated (0%) | It is the responsibility of the financial institution to verify that all conditions specified in the license are met before unfreezing assets. | It is the responsibility of the financial institution to verify that all conditions specified in the license are met before unfreezing assets. |
| 5662a6f6bbc2-85ff-4e42-bd0e-1e9031015481 | Not Translated (0%) | Now let’s look at two examples of specific licenses. | Now let’s look at two examples of specific licenses. |
| 5663a6f6bbc2-85ff-4e42-bd0e-1e9031015481 | Not Translated (0%) | The first program is the “Oil for Food” program in Iraq. | The first program is the “Oil for Food” program in Iraq. |
| 5664a6f6bbc2-85ff-4e42-bd0e-1e9031015481 | Not Translated (0%) | This program was run under the auspices of the United Nations after the second Gulf War. | This program was run under the auspices of the United Nations after the second Gulf War. |
| 5665a6f6bbc2-85ff-4e42-bd0e-1e9031015481 | Not Translated (0%) | It enabled Iraqi exports of oil, normally subject to sanctions, to take place, provided specific conditions were met and the proceeds of the exports were used to finance specified imports. | It enabled Iraqi exports of oil, normally subject to sanctions, to take place, provided specific conditions were met and the proceeds of the exports were used to finance specified imports. |
| 5666a6f6bbc2-85ff-4e42-bd0e-1e9031015481 | Not Translated (0%) | The program was, in essence, a series of specific licenses. | The program was, in essence, a series of specific licenses. |
| 5667a6f6bbc2-85ff-4e42-bd0e-1e9031015481 | Not Translated (0%) | The goal of the program was to pay for food and other necessary items for the population of Iraq, which was suffering from UN sanctions. | The goal of the program was to pay for food and other necessary items for the population of Iraq, which was suffering from UN sanctions. |
| 5668a6f6bbc2-85ff-4e42-bd0e-1e9031015481 | Not Translated (0%) | In reality, Saddam Hussein abused the program, receiving illegal kickbacks and income from smuggling oil. | In reality, Saddam Hussein abused the program, receiving illegal kickbacks and income from smuggling oil. |
| 5669a6f6bbc2-85ff-4e42-bd0e-1e9031015481 | Not Translated (0%) | There was also widespread fraud on the part of some UN employees. | There was also widespread fraud on the part of some UN employees. |
| 56702c7ffb08-f72e-4ab6-934a-a5939e7ecc2e | Not Translated (0%) | “What is the controversy over the U.N. | “What is the controversy over the U.N. |
| 56712c7ffb08-f72e-4ab6-934a-a5939e7ecc2e | Not Translated (0%) | Oil-for-Food Program?” | Oil-for-Food Program?” |
| 56722c7ffb08-f72e-4ab6-934a-a5939e7ecc2e | Not Translated (0%) | Council on Foreign Relations, October 28, 2005. | Council on Foreign Relations, October 28, 2005. |
| 56732f158fa3-a66b-47ce-8faf-51e1f0c92bd8 | Not Translated (0%) | In the second example of specific license, imagine your bank holds an account for a sanctions target. | In the second example of specific license, imagine your bank holds an account for a sanctions target. |
| 56742f158fa3-a66b-47ce-8faf-51e1f0c92bd8 | Not Translated (0%) | The target happens to be a property management company actively managing five apartment buildings. | The target happens to be a property management company actively managing five apartment buildings. |
| 56752f158fa3-a66b-47ce-8faf-51e1f0c92bd8 | Not Translated (0%) | The sanctions restrictions require that the bank freeze the account of the sanctions target—but, naturally, there are ongoing expenses that will need to be paid as part of the ongoing operation of the properties. | The sanctions restrictions require that the bank freeze the account of the sanctions target—but, naturally, there are ongoing expenses that will need to be paid as part of the ongoing operation of the properties. |
| 5676c4f49b57-e33e-4a25-a94d-29f3fc085e6f | Not Translated (0%) | Assume the sanctions regulations in this instance allow for a specific license, permitting the bank to process routine payments, which might include items such as maintenance costs or paying the utility bills each month. | Assume the sanctions regulations in this instance allow for a specific license, permitting the bank to process routine payments, which might include items such as maintenance costs or paying the utility bills each month. |
| 5677c4f49b57-e33e-4a25-a94d-29f3fc085e6f | Not Translated (0%) | The customer would need to apply for a specific license to allow the bank to continue making these payments from the restricted accounts. | The customer would need to apply for a specific license to allow the bank to continue making these payments from the restricted accounts. |
| 5678c4f49b57-e33e-4a25-a94d-29f3fc085e6f | Not Translated (0%) | The bank may suggest that the customer apply for the license but will let the customer handle the license application process. | The bank may suggest that the customer apply for the license but will let the customer handle the license application process. |
| 5679c4f49b57-e33e-4a25-a94d-29f3fc085e6f | Not Translated (0%) | These matters could be fairly technical and will be handled by specialized firms or lawyers. | These matters could be fairly technical and will be handled by specialized firms or lawyers. |
| 568067826994-76d4-47a7-9e1d-684519d53546 | Not Translated (0%) | Prior to submitting this application, the bank should also ensure it has proper and adequate controls in place to monitor these transactions and verify that the payments being processed are, in fact, being applied to the correct expenses. | Prior to submitting this application, the bank should also ensure it has proper and adequate controls in place to monitor these transactions and verify that the payments being processed are, in fact, being applied to the correct expenses. |
| 568167826994-76d4-47a7-9e1d-684519d53546 | Not Translated (0%) | The institution will have specific policies and procedures in place for working with funds that are the subject of a specific license. | The institution will have specific policies and procedures in place for working with funds that are the subject of a specific license. |
| 56826f1b2359-b3a2-4c6e-9662-d2d46a2d4f95 | Not Translated (0%) | LICENSING AUTHORITIES | LICENSING AUTHORITIES |
| 56838e98161d-6ff1-4aa7-a9f2-8b81e75db26b | Not Translated (0%) | Each country has at least one designated sanctions regulator who controls sanction-related licensing for that country. | Each country has at least one designated sanctions regulator who controls sanction-related licensing for that country. |
| 56848e98161d-6ff1-4aa7-a9f2-8b81e75db26b | Not Translated (0%) | Many countries have more than one sanctions regulator. | Many countries have more than one sanctions regulator. |
| 56858e98161d-6ff1-4aa7-a9f2-8b81e75db26b | Not Translated (0%) | For example: | For example: |
| 56864ef105e2-62fa-4250-8ea8-e26e115b1a51 | Not Translated (0%) | In France, sanctions are handled by a specialized office of the Direction générale du Trésor which is part of the Ministry of Economy and Finance. | In France, sanctions are handled by a specialized office of the Direction générale du Trésor which is part of the Ministry of Economy and Finance. |
| 56874ef105e2-62fa-4250-8ea8-e26e115b1a51 | Not Translated (0%) | This office issues both general and specific licenses. | This office issues both general and specific licenses. |
| 56888d816742-a45e-49b5-9da4-3dbf0e1686ab | Not Translated (0%) | In the Netherlands, the Central Import and Export Office (CDIU) is responsible for issuing export and dual-use goods licenses, as well as licenses for other restricted items. | In the Netherlands, the Central Import and Export Office (CDIU) is responsible for issuing export and dual-use goods licenses, as well as licenses for other restricted items. |
| 568963e4a15d-e7b7-40eb-8876-558e519eabc1 | Not Translated (0%) | In the United Kingdom, the relevant regulator is the Office of Financial Sanctions Implementation (OFSI). | In the United Kingdom, the relevant regulator is the Office of Financial Sanctions Implementation (OFSI). |
| 56904d4c0116-b4e4-4a21-9ea2-9d5e48f9d5f6 | Not Translated (0%) | In the United States, the Office of Foreign Asset Control (OFAC) and the US Department of Commerce’s Bureau of Industry and Security (BIS) are both responsible for licensing activities. | In the United States, the Office of Foreign Asset Control (OFAC) and the US Department of Commerce’s Bureau of Industry and Security (BIS) are both responsible for licensing activities. |
| 56914d4c0116-b4e4-4a21-9ea2-9d5e48f9d5f6 | Not Translated (0%) | OFAC is the designated administrator of the sanctions regime and licenses; BIS would intervene for strategic and defense considerations. | OFAC is the designated administrator of the sanctions regime and licenses; BIS would intervene for strategic and defense considerations. |
| 56924d4c0116-b4e4-4a21-9ea2-9d5e48f9d5f6 | Not Translated (0%) | Most licenses would be issued by OFAC. | Most licenses would be issued by OFAC. |
| 56931e53a79b-b3ba-496b-a792-ddfa9ecf302a | Not Translated (0%) | Each of the authorities listed above will generally have published guidance—or at least answers to frequently asked questions (FAQs)—on how to complete license applications. | Each of the authorities listed above will generally have published guidance—or at least answers to frequently asked questions (FAQs)—on how to complete license applications. |
| 56941e53a79b-b3ba-496b-a792-ddfa9ecf302a | Not Translated (0%) | Be sure you always know the licensing regulator and the process of applying for a license in your jurisdiction. | Be sure you always know the licensing regulator and the process of applying for a license in your jurisdiction. |
| 56953b6539c8-e909-40fe-9215-17ac7853639e | Not Translated (0%) | SCOPE OF LICENSING | SCOPE OF LICENSING |
| 569632751030-7e23-41c4-9fc2-751896e43c4e | Not Translated (0%) | In general, it is necessary to apply for a license from the regulatory body in the jurisdiction in which the target’s frozen funds are held. | In general, it is necessary to apply for a license from the regulatory body in the jurisdiction in which the target’s frozen funds are held. |
| 569732751030-7e23-41c4-9fc2-751896e43c4e | Not Translated (0%) | If funds are also paid to a recipient outside of that jurisdiction, it might be necessary to apply for a license in the recipient’s jurisdiction as well. | If funds are also paid to a recipient outside of that jurisdiction, it might be necessary to apply for a license in the recipient’s jurisdiction as well. |
| 569849682fd0-c14b-4585-ac35-c5d741a3a218 | Not Translated (0%) | To make the scope of licensing discussion clearer, look at a fictional example. | To make the scope of licensing discussion clearer, look at a fictional example. |
| 569949682fd0-c14b-4585-ac35-c5d741a3a218 | Not Translated (0%) | Imagine a bank is holding frozen assets for a customer who wants to transfer funds from the bank to a recipient outside the jurisdiction. | Imagine a bank is holding frozen assets for a customer who wants to transfer funds from the bank to a recipient outside the jurisdiction. |
| 570049682fd0-c14b-4585-ac35-c5d741a3a218 | Not Translated (0%) | The first step is to verify the exact nature of the sanctions that affect the customer and apply for a license from the regulator in the bank’s country, as this is where the funds are being held. | The first step is to verify the exact nature of the sanctions that affect the customer and apply for a license from the regulator in the bank’s country, as this is where the funds are being held. |
| 570194a05a71-f72d-4598-ba2f-18ab2a8699ad | Not Translated (0%) | Assume the application is successful, and the license is granted. | Assume the application is successful, and the license is granted. |
| 570294a05a71-f72d-4598-ba2f-18ab2a8699ad | Not Translated (0%) | This license only authorizes the bank to move funds up to a specified aggregate amount out of the jurisdiction in which it operates. | This license only authorizes the bank to move funds up to a specified aggregate amount out of the jurisdiction in which it operates. |
| 570394a05a71-f72d-4598-ba2f-18ab2a8699ad | Not Translated (0%) | The license does not authorize the receipt of the transferred funds by the bank or third party outside the “home” jurisdiction. | The license does not authorize the receipt of the transferred funds by the bank or third party outside the “home” jurisdiction. |
| 570494a05a71-f72d-4598-ba2f-18ab2a8699ad | Not Translated (0%) | The recipient must also apply for a license to receive funds belonging to the sanctions target (assuming the target is also a sanctions target in the “destination” country). | The recipient must also apply for a license to receive funds belonging to the sanctions target (assuming the target is also a sanctions target in the “destination” country). |
| 570545245638-b433-4e50-abc4-201bd9cf1127 | Not Translated (0%) | It is common practice for a remitter bank to ask to see evidence from the beneficiary bank or third party that they have, in fact, been issued a license allowing them to receive funds from the sanctions target. | It is common practice for a remitter bank to ask to see evidence from the beneficiary bank or third party that they have, in fact, been issued a license allowing them to receive funds from the sanctions target. |
| 570645245638-b433-4e50-abc4-201bd9cf1127 | Not Translated (0%) | Note that this is true even within the European Union, so it cannot be assumed, for example, that an EU sanction covering all Member States only requires a single license in order for frozen funds to be paid from one Member State to another. | Note that this is true even within the European Union, so it cannot be assumed, for example, that an EU sanction covering all Member States only requires a single license in order for frozen funds to be paid from one Member State to another. |
| 570745245638-b433-4e50-abc4-201bd9cf1127 | Not Translated (0%) | Transferring funds always requires a careful review to ensure full compliance with all applicable regulations, and transfers between Member States of the European Union are no exception. | Transferring funds always requires a careful review to ensure full compliance with all applicable regulations, and transfers between Member States of the European Union are no exception. |
| 5708bf9df73c-bcf7-416c-aa2e-68408404f2ee | Not Translated (0%) | LICENSES: | LICENSES: |
| 5709bf9df73c-bcf7-416c-aa2e-68408404f2ee | Not Translated (0%) | ERRORS, ERRONEOUS ASSUMPTIONS, AND CHALLENGES | ERRORS, ERRONEOUS ASSUMPTIONS, AND CHALLENGES |
| 5710dc267026-4ee6-49af-8d8f-916b4981a08f | Not Translated (0%) | Licensing is detail-driven and complicated. | Licensing is detail-driven and complicated. |
| 5711dc267026-4ee6-49af-8d8f-916b4981a08f | Not Translated (0%) | As with any complex subject, the potential for making a mistake somewhere along the way is fairly high. | As with any complex subject, the potential for making a mistake somewhere along the way is fairly high. |
| 5712dc267026-4ee6-49af-8d8f-916b4981a08f | Not Translated (0%) | By examining some of the common errors, erroneous assumptions, and challenges of licenses now, you will be better equipped to avoid them in the future: | By examining some of the common errors, erroneous assumptions, and challenges of licenses now, you will be better equipped to avoid them in the future: |
| 5713ee4913e6-35d9-47d2-899e-7b55e875912a | Not Translated (0%) | Confusion regarding who is responsible for obtaining a license is one of the most common sources of errors made in licensing. | Confusion regarding who is responsible for obtaining a license is one of the most common sources of errors made in licensing. |
| 5714ee4913e6-35d9-47d2-899e-7b55e875912a | Not Translated (0%) | Sometimes, more than one party needs to apply for and obtain a license for a single transaction, as seen in the last example. | Sometimes, more than one party needs to apply for and obtain a license for a single transaction, as seen in the last example. |
| 57150e870f21-adb3-4948-9ec0-87d976f656f3 | Not Translated (0%) | In tandem with this confusion is a frequent lack of understanding of the scope of activities covered by a license. | In tandem with this confusion is a frequent lack of understanding of the scope of activities covered by a license. |
| 57160e870f21-adb3-4948-9ec0-87d976f656f3 | Not Translated (0%) | The importance of paying careful attention to the activities that fall within the scope of restrictions cannot be overstated. | The importance of paying careful attention to the activities that fall within the scope of restrictions cannot be overstated. |
| 571711790642-fb85-40d8-814a-cb5a267c367c | Not Translated (0%) | It is assumed that all customers involved in trade activities will have confirmed that the activity is legitimate and which, if any, licenses are required by all parties in the supply chain. | It is assumed that all customers involved in trade activities will have confirmed that the activity is legitimate and which, if any, licenses are required by all parties in the supply chain. |
| 571882c7573d-292a-4136-a727-328382d9fe48 | Not Translated (0%) | These are just a few of the most common licensing mistakes to avoid. | These are just a few of the most common licensing mistakes to avoid. |
| 571982c7573d-292a-4136-a727-328382d9fe48 | Not Translated (0%) | The following tips offer sound strategies on overcoming many of licensing’s most common operational challenges: | The following tips offer sound strategies on overcoming many of licensing’s most common operational challenges: |
| 5720dd8f1c74-951f-45bb-b863-1a3cf9dab96e | Not Translated (0%) | Understand who needs to have a license. | Understand who needs to have a license. |
| 5721dd8f1c74-951f-45bb-b863-1a3cf9dab96e | Not Translated (0%) | This includes your own financial institution. | This includes your own financial institution. |
| 5722ee6fe8a1-5e7a-4267-818e-bd20a14515a8 | Not Translated (0%) | It is necessary to understand which activities can be licensed, and which cannot. | It is necessary to understand which activities can be licensed, and which cannot. |
| 5723ee6fe8a1-5e7a-4267-818e-bd20a14515a8 | Not Translated (0%) | This knowledge enables you to verify whether or not a license is valid and covers the full scope of goods or activities that might be undertaken. | This knowledge enables you to verify whether or not a license is valid and covers the full scope of goods or activities that might be undertaken. |
| 5724a9bf4d8d-ec2b-43e0-b5d8-8d0c26d1f33e | Not Translated (0%) | The requirements and information about licensing published by sanctions regulators varies from jurisdiction to jurisdiction. | The requirements and information about licensing published by sanctions regulators varies from jurisdiction to jurisdiction. |
| 5725a9bf4d8d-ec2b-43e0-b5d8-8d0c26d1f33e | Not Translated (0%) | Never assume the information needed for a license application in one country will be the same as an application in a different country. | Never assume the information needed for a license application in one country will be the same as an application in a different country. |
| 5726a9bf4d8d-ec2b-43e0-b5d8-8d0c26d1f33e | Not Translated (0%) | Similarly, never assume the process of applying for a license to manage frozen funds is going to be the same as the process for applying for a license to export restricted goods; they are very different. | Similarly, never assume the process of applying for a license to manage frozen funds is going to be the same as the process for applying for a license to export restricted goods; they are very different. |
| 5727eea32f9d-f176-4f6e-9165-feb22df6a435 | Not Translated (0%) | The global nature of trade and transport activities means that there will often be more than one jurisdiction requiring a license. | The global nature of trade and transport activities means that there will often be more than one jurisdiction requiring a license. |
| 5728eea32f9d-f176-4f6e-9165-feb22df6a435 | Not Translated (0%) | The documentation for each of these licenses can be complex, and documenting multiple licenses is more complex still. | The documentation for each of these licenses can be complex, and documenting multiple licenses is more complex still. |
| 5729cc0d9c2b-d2de-4d2c-ad23-388e87447e3e | Not Translated (0%) | There is the ever-present possibility of forgery and the potential of being unable to authenticate documents provided by customers. | There is the ever-present possibility of forgery and the potential of being unable to authenticate documents provided by customers. |
| 5730860f3e8e-7207-4f87-9535-b0c38597703a | Not Translated (0%) | It is your responsibility to make sure you keep informed of developments in regulations and restrictions that may affect your customers. | It is your responsibility to make sure you keep informed of developments in regulations and restrictions that may affect your customers. |
| 5731860f3e8e-7207-4f87-9535-b0c38597703a | Not Translated (0%) | Most employers offer regular training or refresher courses in matters of security and compliance; be sure to take advantage of any such opportunities for continuing education. | Most employers offer regular training or refresher courses in matters of security and compliance; be sure to take advantage of any such opportunities for continuing education. |
| 5732ca607a98-7e3d-4733-b39f-49650607cb31 | Not Translated (0%) | Consequences of Noncompliance | Consequences of Noncompliance |
| 5733f9355783-df87-4591-b110-0927d76273b6 | Not Translated (0%) | Researching, documenting, compiling, and submitting license applications to any number of jurisdictions and in any number of situations might seem like an onerous task—but compliance is essential, and it’s the law. | Researching, documenting, compiling, and submitting license applications to any number of jurisdictions and in any number of situations might seem like an onerous task—but compliance is essential, and it’s the law. |
| 5734f9355783-df87-4591-b110-0927d76273b6 | Not Translated (0%) | It is a serious offense to conduct prohibited activity without a license, or to fail to comply with any condition included in a license. | It is a serious offense to conduct prohibited activity without a license, or to fail to comply with any condition included in a license. |
| 5735f9355783-df87-4591-b110-0927d76273b6 | Not Translated (0%) | It is also an offense to knowingly or recklessly provide false information or documents in an effort to obtain a license. | It is also an offense to knowingly or recklessly provide false information or documents in an effort to obtain a license. |
| 5736f9355783-df87-4591-b110-0927d76273b6 | Not Translated (0%) | If errors are discovered, the license will be revoked and the customer, the financial institution that processed the application, and its employees might be subject to penalties and possible criminal prosecution. | If errors are discovered, the license will be revoked and the customer, the financial institution that processed the application, and its employees might be subject to penalties and possible criminal prosecution. |
| 573722a58a2f-63e2-45ff-82ed-34d149ecfef1 | Not Translated (0%) | Now we will step back and take a broader view of licenses and what relevance they have to customer due diligence and ongoing monitoring. | Now we will step back and take a broader view of licenses and what relevance they have to customer due diligence and ongoing monitoring. |
| 573822a58a2f-63e2-45ff-82ed-34d149ecfef1 | Not Translated (0%) | Consider the following questions: | Consider the following questions: |
| 5739a19f3289-f5f8-4779-82ee-2c5ed33c1af7 | Not Translated (0%) | How might you use your customer due diligence processes to identify whether there are customers or activities that might require a license? | How might you use your customer due diligence processes to identify whether there are customers or activities that might require a license? |
| 574051a83acf-fb60-4a2e-a09a-4149faec89c9 | Not Translated (0%) | What policies, procedures, and controls does your firm have in place to mitigate the risk of dealing with frozen assets without first ensuring a specific license? | What policies, procedures, and controls does your firm have in place to mitigate the risk of dealing with frozen assets without first ensuring a specific license? |
| 5741b0a3d19b-7a08-4ab0-9b42-fa31ac43c463 | Not Translated (0%) | What measures does your firm use to monitor activities performed under a general or specific license to ensure they are done in compliance with any license conditions or requirements? | What measures does your firm use to monitor activities performed under a general or specific license to ensure they are done in compliance with any license conditions or requirements? |
| 5742586f0e64-01af-460e-83cd-8e1051e11ca3 | Not Translated (0%) | CASE EXAMPLE (HYPOTHETICAL): | CASE EXAMPLE (HYPOTHETICAL): |
| 5743586f0e64-01af-460e-83cd-8e1051e11ca3 | Not Translated (0%) | SYRIA PROPERTY LTD. | SYRIA PROPERTY LTD. |
| 57449b5dd412-1be7-4d0e-825c-64013c80393e | Not Translated (0%) | Let’s review the case of Syria Property Ltd. as an example of a bank’s requirement to freeze assets and apply for a license. | Let’s review the case of Syria Property Ltd. as an example of a bank’s requirement to freeze assets and apply for a license. |
| 5745f5ada2af-90f1-486b-96eb-d4f9ae86b57c | Not Translated (0%) | Syria Property Ltd. is a real estate management company incorporated in the United Kingdom, and is a customer of UK Bank PLC. | Syria Property Ltd. is a real estate management company incorporated in the United Kingdom, and is a customer of UK Bank PLC. |
| 5746f5ada2af-90f1-486b-96eb-d4f9ae86b57c | Not Translated (0%) | Syria Property Ltd. is a UK-incorporated subsidiary of Syria Finance Ltd., which is an entity incorporated in Syria. | Syria Property Ltd. is a UK-incorporated subsidiary of Syria Finance Ltd., which is an entity incorporated in Syria. |
| 5747f5ada2af-90f1-486b-96eb-d4f9ae86b57c | Not Translated (0%) | Syria Finance Ltd. is controlled by Syrian president Bashar al-Assad and his family, and is a potential source of funding for his regime. | Syria Finance Ltd. is controlled by Syrian president Bashar al-Assad and his family, and is a potential source of funding for his regime. |
| 5748264ee102-abfa-4145-9efd-d3878fb6d2e1 | Not Translated (0%) | Syria Property Ltd. is a designated person pursuant to Council Regulation (EU) No 100/2011 [fictitious] of March 2, 2011 concerning restrictive measures in view of the current situation in Syria. | Syria Property Ltd. is a designated person pursuant to Council Regulation (EU) No 100/2011 [fictitious] of March 2, 2011 concerning restrictive measures in view of the current situation in Syria. |
| 57493af724fe-adf0-40a1-b69a-ed5b3115304b | Not Translated (0%) | Now, consider some of the pertinent facts about Syria Property Ltd.’s operation: | Now, consider some of the pertinent facts about Syria Property Ltd.’s operation: |
| 5750f28251a8-185f-45ca-bfaa-44377cef1905 | Not Translated (0%) | Syria Property Ltd. has a portfolio of properties rented out to businesses or individuals, and it receives regular rental income from these properties. | Syria Property Ltd. has a portfolio of properties rented out to businesses or individuals, and it receives regular rental income from these properties. |
| 5751e80215fc-585e-4ca3-bc66-1494817d3319 | Not Translated (0%) | The company has to pay operating costs on the properties, such as maintenance expenses, salary payments to its employees, utility bills, and taxes. | The company has to pay operating costs on the properties, such as maintenance expenses, salary payments to its employees, utility bills, and taxes. |
| 57527c29dc71-7839-49ac-90ba-b39ef942daa8 | Not Translated (0%) | Syria Property Ltd. also holds a number of business accounts with UK Bank PLC. | Syria Property Ltd. also holds a number of business accounts with UK Bank PLC. |
| 57537c29dc71-7839-49ac-90ba-b39ef942daa8 | Not Translated (0%) | These accounts have significant balances from which payments are made daily. | These accounts have significant balances from which payments are made daily. |
| 575462463105-3c6e-4305-a196-5770a3772595 | Not Translated (0%) | The next step is to compare the factors just listed to the restrictions in the applicable sanctions regulation. | The next step is to compare the factors just listed to the restrictions in the applicable sanctions regulation. |
| 575562463105-3c6e-4305-a196-5770a3772595 | Not Translated (0%) | Council Regulation (EU) No 100/2011 [fictitious] imposes the following sanctions restrictions: | Council Regulation (EU) No 100/2011 [fictitious] imposes the following sanctions restrictions: |
| 575626587a37-1e7a-4f2d-925e-2b92d1b3043b | Not Translated (0%) | An arms embargo and a ban on equipment used for internal repression operations | An arms embargo and a ban on equipment used for internal repression operations |
| 5757ca72f948-30ff-4785-b40a-e922c5415d9f | Not Translated (0%) | Freezing of funds and economic resources of certain persons including Bashar al-Assad and his family and entities involved in serious human rights abuses against persons in Syria | Freezing of funds and economic resources of certain persons including Bashar al-Assad and his family and entities involved in serious human rights abuses against persons in Syria |
| 5758f1c3fba3-cca1-48db-8478-0793730bc84b | Not Translated (0%) | Freezing all funds and economic resources belonging to or owned, held, or controlled by listed natural or legal persons | Freezing all funds and economic resources belonging to or owned, held, or controlled by listed natural or legal persons |
| 57590f8fd1ad-cc00-423d-8232-94bf25816c64 | Not Translated (0%) | Furthermore, the sanction requires that no funds or economic resources shall be made available, directly or indirectly, to or for the benefit of the listed persons. | Furthermore, the sanction requires that no funds or economic resources shall be made available, directly or indirectly, to or for the benefit of the listed persons. |
| 57606a40bce2-fa17-419d-8ef7-d243b3264be5 | Not Translated (0%) | Finally, it is necessary to work through the following five questions. | Finally, it is necessary to work through the following five questions. |
| 57616a40bce2-fa17-419d-8ef7-d243b3264be5 | Not Translated (0%) | Please read each question and give some thought to how you would answer each one. | Please read each question and give some thought to how you would answer each one. |
| 576220501553-b611-4e33-921f-d6254550490d | Not Translated (0%) | Does UK Bank PLC have an obligation to freeze Syria Property Ltd.’s funds held in the bank’s accounts? | Does UK Bank PLC have an obligation to freeze Syria Property Ltd.’s funds held in the bank’s accounts? |
| 5763e81fab97-89e7-412d-a77f-5946be7d6f4d | Not Translated (0%) | If there is an obligation for UK Bank PLC to freeze the funds, is the bank permitted to process any payments? | If there is an obligation for UK Bank PLC to freeze the funds, is the bank permitted to process any payments? |
| 576488821cc7-6ef3-4e6d-893c-8d3c05e5d676 | Not Translated (0%) | Does a lawyer or specialist for UK Bank PLC have to apply for a license to permit Syria Property Ltd. to continue its business and payments as usual? | Does a lawyer or specialist for UK Bank PLC have to apply for a license to permit Syria Property Ltd. to continue its business and payments as usual? |
| 576517020342-8341-4399-a70b-9493679175ad | Not Translated (0%) | If a lawyer or specialist for UK Bank PLC were to apply for a license, what would the license seek to cover? | If a lawyer or specialist for UK Bank PLC were to apply for a license, what would the license seek to cover? |
| 5766bfd6ab95-a93b-41d5-b241-d818a84905ef | Not Translated (0%) | What controls and due diligence must UK Bank PLC undertake on Syria Property Ltd.’s counterparties to ensure that it is not circumventing the prohibitions and is compliant with the regulation? | What controls and due diligence must UK Bank PLC undertake on Syria Property Ltd.’s counterparties to ensure that it is not circumventing the prohibitions and is compliant with the regulation? |
| 5767b5a5a8da-d672-4f45-9f84-a66562ddb96c | Not Translated (0%) | Take a few minutes to form a response to each question, and then the answers will be reviewed. | Take a few minutes to form a response to each question, and then the answers will be reviewed. |
| 5768b5a5a8da-d672-4f45-9f84-a66562ddb96c | Not Translated (0%) | As they are reviewed, notice which aspects you remembered, and which ones you may have left out of your responses. | As they are reviewed, notice which aspects you remembered, and which ones you may have left out of your responses. |
| 576921d3da6b-e740-43c0-bcaa-9d0e42f24c09 | Not Translated (0%) | Does UK Bank PLC have an obligation to freeze Syria Property Ltd.’s funds held in the bank’s accounts? | Does UK Bank PLC have an obligation to freeze Syria Property Ltd.’s funds held in the bank’s accounts? |
| 577055afe7f1-f079-4586-8d6f-10e7f564b674 | Not Translated (0%) | Yes. | Yes. |
| 577155afe7f1-f079-4586-8d6f-10e7f564b674 | Not Translated (0%) | Because Syria Bank Ltd. is listed under the regulation, the bank is obligated to freeze Syria Property Ltd.’s assets. | Because Syria Bank Ltd. is listed under the regulation, the bank is obligated to freeze Syria Property Ltd.’s assets. |
| 577255afe7f1-f079-4586-8d6f-10e7f564b674 | Not Translated (0%) | Even though Syria Property Ltd. is a property management company and is not involved in dealing with the type of equipment listed in the regulation, it is still named as a listed entity, so the freezing requirement applies. | Even though Syria Property Ltd. is a property management company and is not involved in dealing with the type of equipment listed in the regulation, it is still named as a listed entity, so the freezing requirement applies. |
| 57739145d788-ffb0-440e-a2c1-f72984ff6548 | Not Translated (0%) | If there is an obligation for UK Bank PLC to freeze the funds, is the bank permitted to process any payments? | If there is an obligation for UK Bank PLC to freeze the funds, is the bank permitted to process any payments? |
| 577437ca4c08-6c34-4b20-b7c1-a5fad9445dfe | Not Translated (0%) | No. Although UK Bank PLC can credit interest to the accounts, it cannot make any other payments. | No. Although UK Bank PLC can credit interest to the accounts, it cannot make any other payments. |
| 577537ca4c08-6c34-4b20-b7c1-a5fad9445dfe | Not Translated (0%) | Even though Syria Property Ltd. is an operating business and conducts various transactions with a range of suppliers, tenants, and local authorities—none of whom are involved in the prohibited activities—none of these transactions can be processed without a license. | Even though Syria Property Ltd. is an operating business and conducts various transactions with a range of suppliers, tenants, and local authorities—none of whom are involved in the prohibited activities—none of these transactions can be processed without a license. |
| 57761190d8dc-276f-49a4-9546-e049990cadb8 | Not Translated (0%) | Does UK Bank PLC have to apply for a license to permit Syria Property Ltd. to continue its business and payments as usual? | Does UK Bank PLC have to apply for a license to permit Syria Property Ltd. to continue its business and payments as usual? |
| 5777366253fa-29b8-4f23-8eaa-cb1d144f708b | Not Translated (0%) | No, Syria Property LTD must apply for the license and then provide the license to their bank. | No, Syria Property LTD must apply for the license and then provide the license to their bank. |
| 5778366253fa-29b8-4f23-8eaa-cb1d144f708b | Not Translated (0%) | There is no obligation for UK Bank PLC to apply on their behalf. | There is no obligation for UK Bank PLC to apply on their behalf. |
| 5779def002b2-edbe-4923-84e9-3b7803dfa290 | Not Translated (0%) | If UK Bank PLC were to apply for a license, what would the license seek to cover? | If UK Bank PLC were to apply for a license, what would the license seek to cover? |
| 578035c37318-0775-4f06-95e7-fb1e9c387f06 | Not Translated (0%) | UK Bank PLC would seek a specific license that would allow it to process a range of payments for Syria Property Ltd., permitting the processing of a range of payments through its accounts. | UK Bank PLC would seek a specific license that would allow it to process a range of payments for Syria Property Ltd., permitting the processing of a range of payments through its accounts. |
| 578135c37318-0775-4f06-95e7-fb1e9c387f06 | Not Translated (0%) | These could include payments under employment contracts, travel expenses for employees and directors, payments to UK authorities, national insurance, receipt of rent, routine property maintenance, and insurance of buildings. | These could include payments under employment contracts, travel expenses for employees and directors, payments to UK authorities, national insurance, receipt of rent, routine property maintenance, and insurance of buildings. |
| 57822142ac55-ecb4-49fb-b510-2b317bed4ebb | Not Translated (0%) | What controls and due diligence must UK Bank PLC undertake on Syria Property Ltd.’s counterparties to ensure that it is not circumventing the prohibitions and is compliant with the regulation? | What controls and due diligence must UK Bank PLC undertake on Syria Property Ltd.’s counterparties to ensure that it is not circumventing the prohibitions and is compliant with the regulation? |
| 5783c7aeb83f-2d3d-4514-9219-f36bad23b54f | Not Translated (0%) | UK Bank PLC should use enhanced due diligence (EDD) to monitor the Syria Property Ltd. accounts and related activities closely. | UK Bank PLC should use enhanced due diligence (EDD) to monitor the Syria Property Ltd. accounts and related activities closely. |
| 5784c7aeb83f-2d3d-4514-9219-f36bad23b54f | Not Translated (0%) | This could include manual screening to check each payment that goes out of or comes into Syria Property Ltd.’s accounts, to ensure each transaction fits under the parameters set in the license. | This could include manual screening to check each payment that goes out of or comes into Syria Property Ltd.’s accounts, to ensure each transaction fits under the parameters set in the license. |
| 5785c7aeb83f-2d3d-4514-9219-f36bad23b54f | Not Translated (0%) | The bank could also conduct a KYC search for each of Syria Property Ltd.’s counterparties sending or receiving payments from its accounts. | The bank could also conduct a KYC search for each of Syria Property Ltd.’s counterparties sending or receiving payments from its accounts. |
| 5786c7aeb83f-2d3d-4514-9219-f36bad23b54f | Not Translated (0%) | A professional service provider generally can be located through a basic internet search. | A professional service provider generally can be located through a basic internet search. |
| 5787c7aeb83f-2d3d-4514-9219-f36bad23b54f | Not Translated (0%) | Where this is not possible, the bank will need to reach out to Syria Property Ltd. directly for background information. | Where this is not possible, the bank will need to reach out to Syria Property Ltd. directly for background information. |
| 5788a306d1d0-d967-4679-a78b-39747b2ab49b | Not Translated (0%) | Lastly, the bank should check the conditions of the license, as the bank might also be required to provide the sanctions regulator with detailed period reports and bank statements for all accounts. | Lastly, the bank should check the conditions of the license, as the bank might also be required to provide the sanctions regulator with detailed period reports and bank statements for all accounts. |
| 5789a306d1d0-d967-4679-a78b-39747b2ab49b | Not Translated (0%) | Similarly, the conditions might prohibit any payments outside of the United Kingdom. | Similarly, the conditions might prohibit any payments outside of the United Kingdom. |
| 579028c57772-f698-4898-b190-419c37662ec2 | Not Translated (0%) | Delisting | Delisting |
| 5791a424d5f1-0497-467d-baa3-62abfb06847b | Not Translated (0%) | There are cases in which a designated individual or entity can be removed from a sanctions list. | There are cases in which a designated individual or entity can be removed from a sanctions list. |
| 5792a424d5f1-0497-467d-baa3-62abfb06847b | Not Translated (0%) | This is called delisting. | This is called delisting. |
| 5793a424d5f1-0497-467d-baa3-62abfb06847b | Not Translated (0%) | Once the sanction-imposed restrictions are lifted from a target, the target’s name is generally, but not always, removed from the list of sanctions targets. | Once the sanction-imposed restrictions are lifted from a target, the target’s name is generally, but not always, removed from the list of sanctions targets. |
| 5794e1c4f08f-b618-4016-a86e-1dbc103790f4 | Not Translated (0%) | In 2006, the UN adopted the Focal Point for Delisting. | In 2006, the UN adopted the Focal Point for Delisting. |
| 5795e1c4f08f-b618-4016-a86e-1dbc103790f4 | Not Translated (0%) | According to the UN, this is “part of its commitment to ensure that fair and clear procedures exist for placing individuals and entities on the sanctions lists, and for removing them, as well as for granting humanitarian exemptions.” | According to the UN, this is “part of its commitment to ensure that fair and clear procedures exist for placing individuals and entities on the sanctions lists, and for removing them, as well as for granting humanitarian exemptions.” |
| 5796b9fc46da-35d9-4236-bb93-a35217d8aa50 | Not Translated (0%) | United Nations Security Council, “Focal Point for Delisting.” | United Nations Security Council, “Focal Point for Delisting.” |
| 57974ec765a3-9985-41c2-ba31-5d75cf3bec11 | Not Translated (0%) | Individuals and entities, except for those on the ISIL (Da’esh) and Al-Qaeda sanctions list, may petition for removal from the UN sanctions list through the Focal Point process or through their state of residence or citizenship. | Individuals and entities, except for those on the ISIL (Da’esh) and Al-Qaeda sanctions list, may petition for removal from the UN sanctions list through the Focal Point process or through their state of residence or citizenship. |
| 57984ec765a3-9985-41c2-ba31-5d75cf3bec11 | Not Translated (0%) | The Focal Point then reviews and makes a decision as to whether to grant the request for de-listing. | The Focal Point then reviews and makes a decision as to whether to grant the request for de-listing. |
| 57994ec765a3-9985-41c2-ba31-5d75cf3bec11 | Not Translated (0%) | The process itself can take many months as the Focal Point coordinates with the governments involved in the designation, residence, and citizenship of the petitioner to make a determination as to whether the facts submitted support delisting. | The process itself can take many months as the Focal Point coordinates with the governments involved in the designation, residence, and citizenship of the petitioner to make a determination as to whether the facts submitted support delisting. |
| 58004ec765a3-9985-41c2-ba31-5d75cf3bec11 | Not Translated (0%) | Facts for delisting may include, among other circumstances, that the person or entity does not merit inclusion on the list or their inclusion is a case of mistaken identity. | Facts for delisting may include, among other circumstances, that the person or entity does not merit inclusion on the list or their inclusion is a case of mistaken identity. |
| 58019b57d82a-b590-4a2b-bf40-c5ea3f0f7572 | Not Translated (0%) | For entities on the ISIL (Da’esh) and Al-Qaeda sanctions list, they must submit their petitions for delisting through the Office of the Ombudsperson. | For entities on the ISIL (Da’esh) and Al-Qaeda sanctions list, they must submit their petitions for delisting through the Office of the Ombudsperson. |
| 580266b5d085-520d-42f7-a122-848b44e2a7c9 | Not Translated (0%) | There are three primary ways in which a person can be delisted, other than being automatically delisted when the sanctions are removed. | There are three primary ways in which a person can be delisted, other than being automatically delisted when the sanctions are removed. |
| 580366b5d085-520d-42f7-a122-848b44e2a7c9 | Not Translated (0%) | The first two are natural: by death (if the target is an individual) or by legal dissolution (if the target is an entity). | The first two are natural: by death (if the target is an individual) or by legal dissolution (if the target is an entity). |
| 580466b5d085-520d-42f7-a122-848b44e2a7c9 | Not Translated (0%) | Perhaps surprisingly, death or dissolution does not universally result in the target’s name being immediately removed from the sanctions list. | Perhaps surprisingly, death or dissolution does not universally result in the target’s name being immediately removed from the sanctions list. |
| 580566b5d085-520d-42f7-a122-848b44e2a7c9 | Not Translated (0%) | In some jurisdictions, information about the target might be maintained on the published list of targets of a particular sanction. | In some jurisdictions, information about the target might be maintained on the published list of targets of a particular sanction. |
| 580666b5d085-520d-42f7-a122-848b44e2a7c9 | Not Translated (0%) | This is done to help investigators cross-reference and discover matches between new targets and known targets that no longer exist. | This is done to help investigators cross-reference and discover matches between new targets and known targets that no longer exist. |
| 580766b5d085-520d-42f7-a122-848b44e2a7c9 | Not Translated (0%) | In the case of a known target’s death, there could be an estate with assets that could be subject to sanctions and or other restrictions or obligations, including the payment of taxes. | In the case of a known target’s death, there could be an estate with assets that could be subject to sanctions and or other restrictions or obligations, including the payment of taxes. |
| 58080f0e1aa7-5b49-4155-9355-c38d8af5ba41 | Not Translated (0%) | An example of natural delisting that includes both death and dissolution can be found in the UN sanctions entry for Congomet Trading House in the Republic of Congo. | An example of natural delisting that includes both death and dissolution can be found in the UN sanctions entry for Congomet Trading House in the Republic of Congo. |
| 58090f0e1aa7-5b49-4155-9355-c38d8af5ba41 | Not Translated (0%) | The UN entry reads, “No longer exists as a gold trading house in Butembo, North Kivu. | The UN entry reads, “No longer exists as a gold trading house in Butembo, North Kivu. |
| 58100f0e1aa7-5b49-4155-9355-c38d8af5ba41 | Not Translated (0%) | Congomet Trading House (formerly listed as Congocom) was owned by Kisoni Kambale (deceased on 5 July 2007 and subsequently de-listed on 24 April 2008).” | Congomet Trading House (formerly listed as Congocom) was owned by Kisoni Kambale (deceased on 5 July 2007 and subsequently de-listed on 24 April 2008).” |
| 58110f0e1aa7-5b49-4155-9355-c38d8af5ba41 | Not Translated (0%) | The listing also describes the owner’s activities in the region (“Kambala acquired almost all the gold production in the Mongbwalu district, which was controlled by the FNI [Front des nationalistes intégrationnistes, an armed militia group with a significant history of brutal attacks on civilians]”), which could be valuable information in other investigations. | The listing also describes the owner’s activities in the region (“Kambala acquired almost all the gold production in the Mongbwalu district, which was controlled by the FNI [Front des nationalistes intégrationnistes, an armed militia group with a significant history of brutal attacks on civilians]”), which could be valuable information in other investigations. |
| 5812916b650a-e7c4-492f-b448-0ba13b5abc5c | Not Translated (0%) | United Nations Security Council, “Congomet Trading House.” | United Nations Security Council, “Congomet Trading House.” |
| 5813bf2ffa98-0cb0-4e65-976a-80836cf55eaa | Not Translated (0%) | The third way to be delisted is by request by the target. | The third way to be delisted is by request by the target. |
| 5814bf2ffa98-0cb0-4e65-976a-80836cf55eaa | Not Translated (0%) | This generally happens via a written application sent from the target to the authority that imposed the restrictions, or to a local authority who has been designated to address such applications. | This generally happens via a written application sent from the target to the authority that imposed the restrictions, or to a local authority who has been designated to address such applications. |
| 5815bf2ffa98-0cb0-4e65-976a-80836cf55eaa | Not Translated (0%) | As usual, each jurisdiction has slightly different processes for requesting a delisting. | As usual, each jurisdiction has slightly different processes for requesting a delisting. |
| 5816bf2ffa98-0cb0-4e65-976a-80836cf55eaa | Not Translated (0%) | Let’s look at some of the key points for the United Nations, European Union, and United States next. | Let’s look at some of the key points for the United Nations, European Union, and United States next. |
| 5817a5a94f32-eb53-41d6-8189-b5ceadaf5f45 | Not Translated (0%) | UN SANCTIONS | UN SANCTIONS |
| 581855328238-a1bf-4835-8166-d1bcef0f41ad | Not Translated (0%) | To request delisting as a target of sanctions imposed by the United Nations, the target must make a petition to a designated UN Focal Point for Delisting. | To request delisting as a target of sanctions imposed by the United Nations, the target must make a petition to a designated UN Focal Point for Delisting. |
| 581955328238-a1bf-4835-8166-d1bcef0f41ad | Not Translated (0%) | Petitions can also be made to a target party’s jurisdiction of residence or jurisdiction of citizenship. | Petitions can also be made to a target party’s jurisdiction of residence or jurisdiction of citizenship. |
| 582055328238-a1bf-4835-8166-d1bcef0f41ad | Not Translated (0%) | The process is similar whether the target seeks to have assets unfrozen or a travel ban lifted. | The process is similar whether the target seeks to have assets unfrozen or a travel ban lifted. |
| 582155328238-a1bf-4835-8166-d1bcef0f41ad | Not Translated (0%) | Petitioners who are listed on the ISIL (Da’esh) and Al-Qaeda Sanctions List must submit their delisting requests through the Office of the Ombudsperson to the ISIL (Da’esh) and Al-Qaeda Sanctions Committee. | Petitioners who are listed on the ISIL (Da’esh) and Al-Qaeda Sanctions List must submit their delisting requests through the Office of the Ombudsperson to the ISIL (Da’esh) and Al-Qaeda Sanctions Committee. |
| 582241a53827-078a-42dc-9c09-6a92d2b2a89c | Not Translated (0%) | EU SANCTIONS | EU SANCTIONS |
| 5823fa6fb893-ab2f-4b84-a020-92201e149a51 | Not Translated (0%) | Targets listed by the European Union can apply to be delisted directly to the EU General Court, but only for autonomous sanctions (those imposed by the European Union), and only when the listing criteria is no longer met. | Targets listed by the European Union can apply to be delisted directly to the EU General Court, but only for autonomous sanctions (those imposed by the European Union), and only when the listing criteria is no longer met. |
| 5824fa6fb893-ab2f-4b84-a020-92201e149a51 | Not Translated (0%) | Additionally, the European Union reviews its sanctions list periodically, and can decide to delist targets on its own initiative. | Additionally, the European Union reviews its sanctions list periodically, and can decide to delist targets on its own initiative. |
| 582503df62f5-ac92-4205-b6c2-0824a729edf7 | Not Translated (0%) | US SANCTIONS | US SANCTIONS |
| 5826d0621663-7fd0-47a1-afa8-77cbc5835bef | Not Translated (0%) | In the United States, a target can request removal from the SDN list by filing a petition through an administrative (rather than court) process. | In the United States, a target can request removal from the SDN list by filing a petition through an administrative (rather than court) process. |
| 5827d0621663-7fd0-47a1-afa8-77cbc5835bef | Not Translated (0%) | In contrast, removal from the BIS list of denied parties (targets subject to US trade restrictions) happens only when the prohibition itself expires. | In contrast, removal from the BIS list of denied parties (targets subject to US trade restrictions) happens only when the prohibition itself expires. |
| 5828d0621663-7fd0-47a1-afa8-77cbc5835bef | Not Translated (0%) | However, people on this list can apply to be delisted from other lists generated by the BIS. | However, people on this list can apply to be delisted from other lists generated by the BIS. |
| 5829a6f801db-22d0-40af-be7b-992ee2b16010 | Not Translated (0%) | OTHER JURISDICTIONS | OTHER JURISDICTIONS |
| 583075ed94c9-52b3-4c58-ba31-60cb1da5c05b | Not Translated (0%) | With country-level sanctions around the world, each jurisdiction will have a specified process for handling delisting requests and appeals. | With country-level sanctions around the world, each jurisdiction will have a specified process for handling delisting requests and appeals. |
| 583175ed94c9-52b3-4c58-ba31-60cb1da5c05b | Not Translated (0%) | In the United Kingdom, for instance, sanctions targets file an appeal to the High Court. | In the United Kingdom, for instance, sanctions targets file an appeal to the High Court. |
| 5832533ab836-883b-407d-b542-fc340481c951 | Not Translated (0%) | The rules concerning the administration of sanctions in Asia vary from country to country. | The rules concerning the administration of sanctions in Asia vary from country to country. |
| 5833533ab836-883b-407d-b542-fc340481c951 | Not Translated (0%) | In Japan the process is generally handled by CISTEC (Center for Information on Security Trade Control), an agency related to the Ministry of Economy, Trade and Industry (METI), but depending on the type of goods considered, other agencies could be involved. | In Japan the process is generally handled by CISTEC (Center for Information on Security Trade Control), an agency related to the Ministry of Economy, Trade and Industry (METI), but depending on the type of goods considered, other agencies could be involved. |
| 5834533ab836-883b-407d-b542-fc340481c951 | Not Translated (0%) | Singapore implemented the Strategic Goods (Control) Act or SGCA to regulate the trade in strategic goods and strategic goods technology and Singapore Customs has been designated as the entity in charge of administering the SGCA. | Singapore implemented the Strategic Goods (Control) Act or SGCA to regulate the trade in strategic goods and strategic goods technology and Singapore Customs has been designated as the entity in charge of administering the SGCA. |
| 5835533ab836-883b-407d-b542-fc340481c951 | Not Translated (0%) | In China a new law enacted in March 2019 is likely to alter the process of sanctions administration. | In China a new law enacted in March 2019 is likely to alter the process of sanctions administration. |
| 5836533ab836-883b-407d-b542-fc340481c951 | Not Translated (0%) | Thus, you should seek specialized legal advice based on the jurisdictions where the contemplated transactions are expected to occur. | Thus, you should seek specialized legal advice based on the jurisdictions where the contemplated transactions are expected to occur. |
| 5837001e92ad-dc83-451b-a93a-522c51582349 | Not Translated (0%) | HOW DELISTING IMPACTS YOUR KYC AND ONGOING MONITORING | HOW DELISTING IMPACTS YOUR KYC AND ONGOING MONITORING |
| 5838a8d63385-74a5-41ca-b8c9-a5e0b9997b89 | Not Translated (0%) | Imagine you have just been notified that one of your listed customers has been delisted. | Imagine you have just been notified that one of your listed customers has been delisted. |
| 5839a8d63385-74a5-41ca-b8c9-a5e0b9997b89 | Not Translated (0%) | What do you do now? | What do you do now? |
| 5840a8d63385-74a5-41ca-b8c9-a5e0b9997b89 | Not Translated (0%) | Before simply wiping the slate clean, pause to think about how information about delisted parties might be relevant to other investigations. | Before simply wiping the slate clean, pause to think about how information about delisted parties might be relevant to other investigations. |
| 5841a8d63385-74a5-41ca-b8c9-a5e0b9997b89 | Not Translated (0%) | How should that information be used for a new customer who has been delisted? | How should that information be used for a new customer who has been delisted? |
| 5842a8d63385-74a5-41ca-b8c9-a5e0b9997b89 | Not Translated (0%) | What should be done if this new customer says she is a designated target, but that she is appealing the decision? | What should be done if this new customer says she is a designated target, but that she is appealing the decision? |
| 5843a8d63385-74a5-41ca-b8c9-a5e0b9997b89 | Not Translated (0%) | Is the fact that a listed target has filed an appeal reason enough to accept her as a new customer? | Is the fact that a listed target has filed an appeal reason enough to accept her as a new customer? |
| 5844286ba7d3-a5cb-48bb-a3c8-b52bc5aec67a | Not Translated (0%) | Let’s walk through a hypothetical example to get a better understanding of the situation. | Let’s walk through a hypothetical example to get a better understanding of the situation. |
| 584560510c0c-963b-4ca6-a0a0-d1a9f40dd7fa | Not Translated (0%) | You have just received a new account application for a customer named Laura Mertz Moroz. | You have just received a new account application for a customer named Laura Mertz Moroz. |
| 584660510c0c-963b-4ca6-a0a0-d1a9f40dd7fa | Not Translated (0%) | You begin research and find her name on a list of sanctions targets. | You begin research and find her name on a list of sanctions targets. |
| 584760510c0c-963b-4ca6-a0a0-d1a9f40dd7fa | Not Translated (0%) | Ms. Moroz confirms that she is the person identified on the list. | Ms. Moroz confirms that she is the person identified on the list. |
| 584860510c0c-963b-4ca6-a0a0-d1a9f40dd7fa | Not Translated (0%) | She explains that she was only added to the list because her ex-husband was listed because of his business activities in Belarus. | She explains that she was only added to the list because her ex-husband was listed because of his business activities in Belarus. |
| 584960510c0c-963b-4ca6-a0a0-d1a9f40dd7fa | Not Translated (0%) | Ms. Moroz is now divorced, and she is confident her petition to be delisted will be resolved satisfactorily “any day now.” | Ms. Moroz is now divorced, and she is confident her petition to be delisted will be resolved satisfactorily “any day now.” |
| 585063da5ca8-c6f4-4b03-b478-768906214fce | Not Translated (0%) | Should you accept this customer as a client? | Should you accept this customer as a client? |
| 585163da5ca8-c6f4-4b03-b478-768906214fce | Not Translated (0%) | If she is listed on the OFAC list, would your firm need to file a report with OFAC? | If she is listed on the OFAC list, would your firm need to file a report with OFAC? |
| 5852ec2f0e42-44f9-4a8d-af4d-5a5f395f3a60 | Not Translated (0%) | The answer to the first question is clearly NO. | The answer to the first question is clearly NO. |
| 5853ec2f0e42-44f9-4a8d-af4d-5a5f395f3a60 | Not Translated (0%) | The reasons should not be a surprise at this point: | The reasons should not be a surprise at this point: |
| 5854b453f74d-5937-4dca-bf6c-ad134d3a9813 | Not Translated (0%) | You have no evidence that Ms. Moroz has actually submitted her petition to be delisted with the proper authority. | You have no evidence that Ms. Moroz has actually submitted her petition to be delisted with the proper authority. |
| 585512bfef2c-330f-4601-bfd3-75c63d0f9a14 | Not Translated (0%) | You do not know whether the customer still has connections to other sanctioned persons, which could elevate the firm’s risk level. | You do not know whether the customer still has connections to other sanctioned persons, which could elevate the firm’s risk level. |
| 58562055dea6-7877-4a2b-a28b-5a1ce2529cc7 | Not Translated (0%) | You have no evidence that the authority has agreed to delist her. | You have no evidence that the authority has agreed to delist her. |
| 58576f907675-9683-4d50-8879-a27e8e3193ab | Not Translated (0%) | The reason Ms. Moroz is listed is irrelevant in deciding whether to open an account for her; the fact that she is currently listed is sufficient reason to decline her application. | The reason Ms. Moroz is listed is irrelevant in deciding whether to open an account for her; the fact that she is currently listed is sufficient reason to decline her application. |
| 58584b8cdf99-b40b-42e8-88cc-dbbc4bbc7d19 | Not Translated (0%) | In addition, she may represent a high risk that, by policy, the bank does not want to assume. | In addition, she may represent a high risk that, by policy, the bank does not want to assume. |
| 5859a77c41f4-fd60-40f8-8f14-eae338af77ec | Not Translated (0%) | Regarding the question of whether you will need to file an OFAC report, the question is also NO. | Regarding the question of whether you will need to file an OFAC report, the question is also NO. |
| 5860a77c41f4-fd60-40f8-8f14-eae338af77ec | Not Translated (0%) | You have not done anything other than screen Ms. Moroz—you haven’t approved her application or processed any transactions—there is no reason to submit a report to OFAC. | You have not done anything other than screen Ms. Moroz—you haven’t approved her application or processed any transactions—there is no reason to submit a report to OFAC. |
| 5861a77c41f4-fd60-40f8-8f14-eae338af77ec | Not Translated (0%) | However, to be on the safe side, you may want to check with your legal or regulatory relations department if a suspicious activity report (SAR) or other reports may need to be filed with bank regulators, as a designated person could be the object of a criminal investigation. | However, to be on the safe side, you may want to check with your legal or regulatory relations department if a suspicious activity report (SAR) or other reports may need to be filed with bank regulators, as a designated person could be the object of a criminal investigation. |
| 58629d68ab7b-6009-4a52-ad39-3be5dd9f7351 | Not Translated (0%) | Management and Reporting Obligations | Management and Reporting Obligations |
| 58634378bf96-d98a-47a5-86b8-5aeadb7257e1 | Not Translated (0%) | Management and reporting obligations pertaining to sanctions targets and frozen assets vary from jurisdiction to jurisdiction, as well. | Management and reporting obligations pertaining to sanctions targets and frozen assets vary from jurisdiction to jurisdiction, as well. |
| 58644378bf96-d98a-47a5-86b8-5aeadb7257e1 | Not Translated (0%) | In general, though, all documents regarding frozen assets must be kept for a period of five years from the date the funds were released. | In general, though, all documents regarding frozen assets must be kept for a period of five years from the date the funds were released. |
| 586548a95285-bbaa-428a-ac9b-94d42a9c3310 | Not Translated (0%) | REPORTING IN THE EUROPEAN UNION | REPORTING IN THE EUROPEAN UNION |
| 58660e0d8b90-2be1-4385-980b-ad8b928f0bde | Not Translated (0%) | Different countries’ requirements for what information needs to be reported vary a bit more, but the European Union is fairly standard in the following requirements: | Different countries’ requirements for what information needs to be reported vary a bit more, but the European Union is fairly standard in the following requirements: |
| 58673df6fba1-97ac-47cf-97d0-328667c51248 | Not Translated (0%) | Reports must include all the information that guided the firm in its decision, all information held by financial institutions about the sanctions target by which the person can be identified, and the nature and quantity of any economic resources held by the financial institution for the sanctions target. | Reports must include all the information that guided the firm in its decision, all information held by financial institutions about the sanctions target by which the person can be identified, and the nature and quantity of any economic resources held by the financial institution for the sanctions target. |
| 5868b61aebb7-ed88-4868-9f0d-167a95d5e8a4 | Not Translated (0%) | Frozen assets and blocked funds must be reported without delay—usually within a brief timeframe. | Frozen assets and blocked funds must be reported without delay—usually within a brief timeframe. |
| 5869b61aebb7-ed88-4868-9f0d-167a95d5e8a4 | Not Translated (0%) | A firm’s IT systems will generate a report that could be relayed to the supervising authorities. | A firm’s IT systems will generate a report that could be relayed to the supervising authorities. |
| 587090131173-25e7-4f67-9dc2-0e35640cc896 | Not Translated (0%) | Frozen funds must be segregated but are not required to be placed in an interest-bearing account. | Frozen funds must be segregated but are not required to be placed in an interest-bearing account. |
| 587127442e44-5176-401b-b841-2eefd7716246 | Not Translated (0%) | Customers may apply to the competent supervising agency for the release of blocked funds. | Customers may apply to the competent supervising agency for the release of blocked funds. |
| 587250c8bfff-7008-4b9a-8ba8-6b007667b9ef | Not Translated (0%) | REPORTING IN THE UNITED KINGDOM | REPORTING IN THE UNITED KINGDOM |
| 587384b8bfae-bb4a-465a-b1a2-409e6d090caf | Not Translated (0%) | The United Kingdom, like the European Union, has its own regulatory authority and its own set of reporting rules. | The United Kingdom, like the European Union, has its own regulatory authority and its own set of reporting rules. |
| 587484b8bfae-bb4a-465a-b1a2-409e6d090caf | Not Translated (0%) | Here, reports must be made if you have reasonable cause to suspect that a breach of a sanctions has occurred, or that a party you dealt with is a designated person. | Here, reports must be made if you have reasonable cause to suspect that a breach of a sanctions has occurred, or that a party you dealt with is a designated person. |
| 587584b8bfae-bb4a-465a-b1a2-409e6d090caf | Not Translated (0%) | The behavior of banks and other financial institutions is also held to a high standard: businesses must self-report when they suspect or know that they have violated a sanctions restriction. | The behavior of banks and other financial institutions is also held to a high standard: businesses must self-report when they suspect or know that they have violated a sanctions restriction. |
| 587684b8bfae-bb4a-465a-b1a2-409e6d090caf | Not Translated (0%) | Assets that are frozen or blocked must be reported to the relevant authority as well, and all reporting must be done as soon as reasonably possible. | Assets that are frozen or blocked must be reported to the relevant authority as well, and all reporting must be done as soon as reasonably possible. |
| 5877f06fa1b5-cec5-43e6-aae0-c38828a6d69e | Not Translated (0%) | REPORTING IN THE UNITED STATES | REPORTING IN THE UNITED STATES |
| 58787feb507e-1d76-42ed-998e-8124ce45e224 | Not Translated (0%) | According to OFAC’s regional reporting requirements, businesses are encouraged to voluntarily disclose past violations, and self-disclosure is a mitigating factor in OFAC’s response to past violations. | According to OFAC’s regional reporting requirements, businesses are encouraged to voluntarily disclose past violations, and self-disclosure is a mitigating factor in OFAC’s response to past violations. |
| 58797feb507e-1d76-42ed-998e-8124ce45e224 | Not Translated (0%) | This type of self-disclosure is in the form of a detailed letter accompanied by any and all supporting documentation. | This type of self-disclosure is in the form of a detailed letter accompanied by any and all supporting documentation. |
| 58807feb507e-1d76-42ed-998e-8124ce45e224 | Not Translated (0%) | Blocked or rejected funds must be reported within 10 business days of the day they are blocked or rejected. | Blocked or rejected funds must be reported within 10 business days of the day they are blocked or rejected. |
| 5881f5065aff-96ca-4dd6-b90e-762c462c9f60 | Not Translated (0%) | A FINAL NOTE ABOUT REPORTING | A FINAL NOTE ABOUT REPORTING |
| 58823f9255e2-d3f2-4470-9948-6fdbe65be407 | Not Translated (0%) | All the details needed to write and file various reports in any jurisdiction should be available from those jurisdictions. | All the details needed to write and file various reports in any jurisdiction should be available from those jurisdictions. |
| 58833f9255e2-d3f2-4470-9948-6fdbe65be407 | Not Translated (0%) | Additionally, the firm’s own policies and procedures around sanctions compliance and reporting should be readily available. | Additionally, the firm’s own policies and procedures around sanctions compliance and reporting should be readily available. |
| 58843f9255e2-d3f2-4470-9948-6fdbe65be407 | Not Translated (0%) | But there’s another, more fundamental, concept to keep in mind about the reporting process: perhaps the most important takeaway message on this topic is that a business should never try to internally manage cases in which it has identified funds belonging to a sanctions target or realized it has violated a sanctions restriction. | But there’s another, more fundamental, concept to keep in mind about the reporting process: perhaps the most important takeaway message on this topic is that a business should never try to internally manage cases in which it has identified funds belonging to a sanctions target or realized it has violated a sanctions restriction. |
| 58853f9255e2-d3f2-4470-9948-6fdbe65be407 | Not Translated (0%) | These instances need to be promptly reported to the appropriate institutions to avoid the appearance of impropriety. | These instances need to be promptly reported to the appropriate institutions to avoid the appearance of impropriety. |
| 58863f9255e2-d3f2-4470-9948-6fdbe65be407 | Not Translated (0%) | Make sure that all steps in an investigation are recorded and keep copies of search results and internal memos relative to each case, as such documents may be required in the future. | Make sure that all steps in an investigation are recorded and keep copies of search results and internal memos relative to each case, as such documents may be required in the future. |
| 58873f9255e2-d3f2-4470-9948-6fdbe65be407 | Not Translated (0%) | The sooner these events are reported to the proper authorities, the better. | The sooner these events are reported to the proper authorities, the better. |
| 58886b23e9ec-093e-4799-a7f6-7530c32b9317 | Not Translated (0%) | Course Review | Course Review |
| 5889e5b83148-d59e-43c3-b070-d51cffa657cd | Not Translated (0%) | Review Questions | Review Questions |
| 5890192c4d2a-2fb9-4b3b-bf73-01c334203caa | Not Translated (0%) | Disclaimer: | Disclaimer: |
| 5891192c4d2a-2fb9-4b3b-bf73-01c334203caa | Not Translated (0%) | The review questions contained within this chapter are not meant to indicate the exact style or difficulty level of the actual CGSS Examination questions. | The review questions contained within this chapter are not meant to indicate the exact style or difficulty level of the actual CGSS Examination questions. |
| 5892192c4d2a-2fb9-4b3b-bf73-01c334203caa | Not Translated (0%) | They are designed to help candidates review the content of the examination manual. | They are designed to help candidates review the content of the examination manual. |
| 5893f11d5d39-9952-46cf-a995-87a8da1ee3b9 | Not Translated (0%) | <13747>Module</13747> Review: | <13747>Module</13747> Review: |
| 5894f11d5d39-9952-46cf-a995-87a8da1ee3b9 | Not Translated (0%) | Governance and Enforcement | Governance and Enforcement |
| 58959d1a4556-9320-4e1e-bd30-7575943de7a8 | Not Translated (0%) | What was the first recognized global body to impose sanctions? | What was the first recognized global body to impose sanctions? |
| 5896cec6e213-684d-438c-8653-ce12cfccd252 | Not Translated (0%) | League of Nations | League of Nations |
| 5897cb372e5d-c5fd-46d5-80ea-181406cec3a9 | Not Translated (0%) | United Nations | United Nations |
| 58986a243c97-3ffa-4094-936f-8daf2faeb644 | Not Translated (0%) | US Congress | US Congress |
| 5899a3618e1f-464a-4263-8415-21ae3911038f | Not Translated (0%) | British Parliament | British Parliament |
| 5900a4a426a5-ee16-4ec5-a8b3-bf64a1e55c2d | Not Translated (0%) | The power to deploy sanctions are included: | The power to deploy sanctions are included: |
| 5901c840660b-714b-4d26-8742-bd686b5c9182 | Not Translated (0%) | in the decree ending World War II. | in the decree ending World War II. |
| 5902abffdca6-7658-4380-b416-db42f7a796c0 | Not Translated (0%) | In the Constitution of the United States. | In the Constitution of the United States. |
| 5903d0afff73-044a-4fb9-934b-152f6bb39f7b | Not Translated (0%) | in the League of Nations Covenants. | in the League of Nations Covenants. |
| 5904745751b3-f064-4363-8961-25c3d5c9d1f3 | Not Translated (0%) | In World Court rulings. | In World Court rulings. |
| 590524c6ee17-b157-414c-bbe2-a327eff62997 | Not Translated (0%) | One of the first recorded instances of sanctions was the: | One of the first recorded instances of sanctions was the: |
| 590650958737-a0cd-4df2-a1c2-26695d31d996 | Not Translated (0%) | Megarian Decree. | Megarian Decree. |
| 5907c487f99a-173e-45ac-9cf8-e7b3711824a2 | Not Translated (0%) | Blockade of Boston Harbor. | Blockade of Boston Harbor. |
| 59083e515cd4-5be3-424e-afbc-529bcba96111 | Not Translated (0%) | Spanish Armada’s blockade of English ports. | Spanish Armada’s blockade of English ports. |
| 590913cbb9fe-af29-4c68-bf02-2c7c7bec9ed8 | Not Translated (0%) | Ventôse Decrees. | Ventôse Decrees. |
| 5910f9b0956b-8ce7-4dd3-ae58-b5ed7dabae41 | Not Translated (0%) | The Non-Proliferation Treaty is intended to prevent the spread of nuclear weapons and technology and promote peaceful uses of which of the following? | The Non-Proliferation Treaty is intended to prevent the spread of nuclear weapons and technology and promote peaceful uses of which of the following? |
| 591165e4a1e3-fbed-41af-9c78-89b743308778 | Not Translated (0%) | Dual-use goods | Dual-use goods |
| 5912163287e9-2007-443a-87e0-a61a3edcb494 | Not Translated (0%) | Nuclear energy | Nuclear energy |
| 5913c9867d41-daf0-4f6c-90e1-f0aa6ebcd28c | Not Translated (0%) | Military force | Military force |
| 59143acad832-bf73-4b94-96fa-e796cb3c88b1 | Not Translated (0%) | Economic sanctions | Economic sanctions |
| 5915cf242f51-c11e-4d9a-ae81-c6e3a035ddba | Not Translated (0%) | The Magnitsky Act allows the US government to freeze the assets of and ban entry of any foreign official implicated in which of the following? | The Magnitsky Act allows the US government to freeze the assets of and ban entry of any foreign official implicated in which of the following? |
| 5916610b2746-8616-4d9a-9653-b5df350668f4 | Not Translated (0%) | Transshipment | Transshipment |
| 5917cedb9e5a-540c-43c8-9515-2b7070ae7cbc | Not Translated (0%) | Money laundering | Money laundering |
| 591816ccfc15-d238-482d-9e5b-f705174cf118 | Not Translated (0%) | Human rights violation | Human rights violation |
| 5919ffcaed10-fa9f-46fc-8eff-9d61c58f08eb | Not Translated (0%) | Trade finance | Trade finance |
| 59202a9e25c1-0805-4d7e-b389-2a7a9dca5d7e | Not Translated (0%) | Which of the following best describes the Financial Action Task Force’s Mutual Evaluation Reports? | Which of the following best describes the Financial Action Task Force’s Mutual Evaluation Reports? |
| 5921970bbf15-8fb3-4062-b28d-2d8c256f6cbf | Not Translated (0%) | Reports conducted by one country against another to determine the strength of its sanctions regime | Reports conducted by one country against another to determine the strength of its sanctions regime |
| 5922c0d9a829-2ef0-4007-941b-f56100a6c8dc | Not Translated (0%) | Reports that determine whether countries are required to comply with FATF’s standards | Reports that determine whether countries are required to comply with FATF’s standards |
| 59239a5b650f-f1d5-4a6d-ac35-195f15e98fb4 | Not Translated (0%) | Reports issued by a country’s regulators on a financial institution’s financial crimes compliance weaknesses | Reports issued by a country’s regulators on a financial institution’s financial crimes compliance weaknesses |
| 5924a8f67ea9-0dbd-4b98-8207-c714b3816fe0 | Not Translated (0%) | Reports that evaluate a country’s compliance with FATF’s recommendations | Reports that evaluate a country’s compliance with FATF’s recommendations |
| 5925e3dcb5e5-8522-49d3-9910-d1cdccf3924a | Not Translated (0%) | A US consultant is in Beijing, China working on a project for a major Chinese financial institution, and is asked how to set up a sanctions compliance program to engage in trade-related transactions with the country of Iran. | A US consultant is in Beijing, China working on a project for a major Chinese financial institution, and is asked how to set up a sanctions compliance program to engage in trade-related transactions with the country of Iran. |
| 5926e3dcb5e5-8522-49d3-9910-d1cdccf3924a | Not Translated (0%) | The US consultant drafts a sanctions compliance framework and delivers it to the client. | The US consultant drafts a sanctions compliance framework and delivers it to the client. |
| 5927e3dcb5e5-8522-49d3-9910-d1cdccf3924a | Not Translated (0%) | The consultant is most likely engaged in: | The consultant is most likely engaged in: |
| 59288b466876-8490-4b2a-a871-dcb818c445e5 | Not Translated (0%) | Wire-stripping. | Wire-stripping. |
| 5929224ff7e5-fbb2-4c34-ac91-8a51fd8971b0 | Not Translated (0%) | Facilitation. | Facilitation. |
| 5930d9203d2a-b83d-49c9-b1bd-abaeb44d3dda | Not Translated (0%) | Transshipment. | Transshipment. |
| 5931074c3259-f5d3-48ab-a131-bbc6eedbd436 | Not Translated (0%) | Risk management. | Risk management. |
| 5932b492c278-d5ef-4db6-a477-fbf918d86421 | Not Translated (0%) | Which of the following describes multiple countries working together to block trade and issue embargoes against another country? | Which of the following describes multiple countries working together to block trade and issue embargoes against another country? |
| 5933c4dc7717-a8f0-4042-b518-0ad6ebc04897 | Not Translated (0%) | Multilateral sanctions | Multilateral sanctions |
| 5934c7a87a4b-8fe0-4eb5-a09d-910f247c4706 | Not Translated (0%) | Unilateral sanctions | Unilateral sanctions |
| 59359b667042-eb53-4190-a229-5474c8e4b330 | Not Translated (0%) | Autonomous sanctions | Autonomous sanctions |
| 5936dc7f5661-dc18-4657-876e-546ccc189cba | Not Translated (0%) | Financial sanctions | Financial sanctions |
| 5937bf643ce0-007c-451f-91bf-181bfc46b87b | Not Translated (0%) | Which of the following is a government’s exercise of its authority beyond its geographical boundaries? | Which of the following is a government’s exercise of its authority beyond its geographical boundaries? |
| 5938e9b27d49-0195-4fb3-9f2c-646d7b51aa73 | Not Translated (0%) | Long-arm jurisdiction | Long-arm jurisdiction |
| 59393ddfc405-610d-4324-a98b-2702bf780f20 | Not Translated (0%) | Sphere of influence | Sphere of influence |
| 594048ef0293-81bf-4e1a-abe6-f08759e86e0d | Not Translated (0%) | Geographic authority | Geographic authority |
| 594143442339-a9e0-4ced-ba8e-926c5157f3d6 | Not Translated (0%) | Extraterritoriality | Extraterritoriality |
| 59428c6cd08c-8bee-4a1c-a94d-83e9350c0e49 | Not Translated (0%) | An SDN deposits US funds into his bank account in Germany with a German bank. | An SDN deposits US funds into his bank account in Germany with a German bank. |
| 59438c6cd08c-8bee-4a1c-a94d-83e9350c0e49 | Not Translated (0%) | The German bank maintains a nostro account with a US financial institution in New York. | The German bank maintains a nostro account with a US financial institution in New York. |
| 59448c6cd08c-8bee-4a1c-a94d-83e9350c0e49 | Not Translated (0%) | The funds may be subject to forfeiture according to which 2001 US law? | The funds may be subject to forfeiture according to which 2001 US law? |
| 59456d8fe204-4fbd-4778-acea-4f0cef915672 | Not Translated (0%) | The USA PATRIOT Act | The USA PATRIOT Act |
| 59465bb4d1b7-2040-4c86-bb84-3adc841b2e5c | Not Translated (0%) | The Magnitsky Act | The Magnitsky Act |
| 594797fe06f4-6849-45b1-83f2-4590786be728 | Not Translated (0%) | FATF recommendations | FATF recommendations |
| 5948fb30dc05-df17-4ae3-84ae-e62733e8b35d | Not Translated (0%) | EU Directive 4 | EU Directive 4 |
| 5949e1742b5b-f8bc-4489-9645-05780db60be2 | Not Translated (0%) | Which of the following is the most common type of sanctions imposed by one nation upon another? | Which of the following is the most common type of sanctions imposed by one nation upon another? |
| 5950add055ab-4e64-42a1-8d32-b4898b485f57 | Not Translated (0%) | Trade | Trade |
| 5951fa5f71ed-1744-49da-b137-6f8b0f7eae56 | Not Translated (0%) | Economic | Economic |
| 59529d2d8104-a1fa-4b8c-be4b-e22ec27f5c22 | Not Translated (0%) | Multilateral | Multilateral |
| 5953c54f2aa8-fa03-4f04-925e-990bb0fe29c9 | Not Translated (0%) | Compliance | Compliance |
| 59549e771a0b-02d4-48de-bc1f-757564c3a747 | Not Translated (0%) | During which period did governments impose sanctions more often than in prior decades? | During which period did governments impose sanctions more often than in prior decades? |
| 5955cc3ac63a-10e7-4290-be16-b4f7583220cc | Not Translated (0%) | Great Depression | Great Depression |
| 5956a54fc0da-8646-4da9-9487-f8b9762e0e4b | Not Translated (0%) | Cold War | Cold War |
| 5957f2599ecc-68e2-401b-887e-79fb4b415557 | Not Translated (0%) | Golden Age | Golden Age |
| 5958303bcf4b-55d5-4d36-b5c8-4f362e70a46c | Not Translated (0%) | Gulf War | Gulf War |
| 5959d19afdcd-5bd7-41c6-a592-0e85ea8ae98f | Not Translated (0%) | The bombing of which site provoked questions about whether sanctions were an alternative to war or might hasten military force? | The bombing of which site provoked questions about whether sanctions were an alternative to war or might hasten military force? |
| 59609b76bdc8-4b13-4600-84cf-03d0560bc206 | Not Translated (0%) | Alfred P. Murrah Federal Building | Alfred P. Murrah Federal Building |
| 5961e6836540-714d-4b84-8b1f-4e451eb6b187 | Not Translated (0%) | World Trade Center | World Trade Center |
| 596251c7697d-5bc5-44f0-b206-42678d615cfe | Not Translated (0%) | Pearl Harbor | Pearl Harbor |
| 59638ff070e7-4786-4827-8333-a5c797fd4b1b | Not Translated (0%) | US Embassy in Tanzania | US Embassy in Tanzania |
| 59646e442970-c263-445c-8902-05fa0eb8eb01 | Not Translated (0%) | Which of the following has <14143>not</14143> been used as an official reason for imposing sanctions? | Which of the following has <14143>not</14143> been used as an official reason for imposing sanctions? |
| 5965fe793519-227b-4723-9361-3ff95e8a01d9 | Not Translated (0%) | Preventing war | Preventing war |
| 59668d9e8860-1fda-4129-bab8-1792d4fc548e | Not Translated (0%) | Raising money for humanitarian relief | Raising money for humanitarian relief |
| 59673886e50c-5a05-487a-9135-6cdeaf9715ea | Not Translated (0%) | Freeing captured citizens | Freeing captured citizens |
| 596809a439d4-7962-4430-a25c-dff93771102d | Not Translated (0%) | Reinforcing labor rights | Reinforcing labor rights |
| 5969f4b8d7b2-c4aa-4432-885a-66f9f09f50d4 | Not Translated (0%) | The assassination of a <14174>Washington Post</14174> reporter in Turkey in 2018 resulted in sanctions under the provisions of which of the following? | The assassination of a <14174>Washington Post</14174> reporter in Turkey in 2018 resulted in sanctions under the provisions of which of the following? |
| 5970d97293a3-f245-4e1c-a682-e95bbd1a2f66 | Not Translated (0%) | Sectoral sanctions | Sectoral sanctions |
| 5971cbd7d00a-7c2f-49a5-bf85-0200749eeb5c | Not Translated (0%) | USA PATRIOT Act | USA PATRIOT Act |
| 5972a357be2a-97e6-45a5-adc7-9a4c491e08af | Not Translated (0%) | Magnitsky Act | Magnitsky Act |
| 597370d53513-adee-4ca2-9690-b6877a9fe90b | Not Translated (0%) | Non-Proliferation Treaty | Non-Proliferation Treaty |
| 5974824c881b-f7df-456f-a65d-811f3e581b36 | Not Translated (0%) | Which of the following is not a purpose of sanctions? | Which of the following is not a purpose of sanctions? |
| 5975d9815754-c7e6-4a8c-a519-f815ed4d7ba3 | Not Translated (0%) | Alternative to the use of force | Alternative to the use of force |
| 597654b585a1-71a9-4c1a-b1e7-3d80f5923e0e | Not Translated (0%) | Punish human rights abusers | Punish human rights abusers |
| 597761819fd1-17ae-407c-bdd4-0b7a1122aeb0 | Not Translated (0%) | Prevent the proliferation of weapons of mass destruction | Prevent the proliferation of weapons of mass destruction |
| 5978fdb2f5cb-4e69-4b06-8c15-f76610effa31 | Not Translated (0%) | Ensure access to natural resources | Ensure access to natural resources |
| 59791f98129e-2a92-4318-86d5-6a560646a4e8 | Not Translated (0%) | The UN Security Council has set some key criteria for targeting individuals and entities. | The UN Security Council has set some key criteria for targeting individuals and entities. |
| 59801f98129e-2a92-4318-86d5-6a560646a4e8 | Not Translated (0%) | Which of the following scenarios is most likely to result in the imposition of Security Council sanctions against an entity? | Which of the following scenarios is most likely to result in the imposition of Security Council sanctions against an entity? |
| 5981be4163fd-7806-4804-beb5-d4b59d2421b7 | Not Translated (0%) | Violating human rights | Violating human rights |
| 5982d7e0f49f-fd1a-4adf-aef9-447af56648be | Not Translated (0%) | Violating environmental resolutions | Violating environmental resolutions |
| 59837d76efeb-a4a7-4556-a08d-cd056838a273 | Not Translated (0%) | Violating intergovernmental agreements | Violating intergovernmental agreements |
| 59842655671d-cd61-4c54-a2f0-ad54cd8f0272 | Not Translated (0%) | Violating the Wassenaar Agreement | Violating the Wassenaar Agreement |
| 5985d65d9ee4-fc81-44d2-9611-345c42041e30 | Not Translated (0%) | Which of the following countries is <14265>not</14265> a permanent member of the U.N. | Which of the following countries is <14265>not</14265> a permanent member of the U.N. |
| 5986d65d9ee4-fc81-44d2-9611-345c42041e30 | Not Translated (0%) | Security Council? | Security Council? |
| 5987fb59b06a-174f-4a0a-b3fe-c4d886f3b192 | Not Translated (0%) | China | China |
| 5988c489322d-a457-4dce-90c7-c1b2b0729a73 | Not Translated (0%) | Egypt | Egypt |
| 5989fc2219b4-9f77-40fd-a9fd-f29c404d13b6 | Not Translated (0%) | France | France |
| 5990c1bfc71d-c3cf-43f3-ba2a-fa2ebf5a767b | Not Translated (0%) | Russia | Russia |
| 59918fc0101d-eedf-4aa7-8467-3c37b31968ad | Not Translated (0%) | The Denied Persons List is a list of people who have been denied which type of privileges? | The Denied Persons List is a list of people who have been denied which type of privileges? |
| 5992de95d81a-28f1-44cd-8fd9-ed81869b767d | Not Translated (0%) | Export | Export |
| 59930efc3e77-fbb4-4d1e-a269-74edc52b7b24 | Not Translated (0%) | Travel | Travel |
| 5994b7190d96-f78e-48f9-b721-417dda8d760b | Not Translated (0%) | Voting | Voting |
| 59959c750322-b5b7-47bd-8685-28dc0dc43f5c | Not Translated (0%) | International banking | International banking |
| 5996d8dfc464-6418-4229-9b97-c9128074ed5a | Not Translated (0%) | FinCEN issues a rule designating a Russian bank as a primary money laundering concern. | FinCEN issues a rule designating a Russian bank as a primary money laundering concern. |
| 5997d8dfc464-6418-4229-9b97-c9128074ed5a | Not Translated (0%) | As a compliance officer at a European financial institution with US correspondent accounts, you receive a notice from your US correspondent. | As a compliance officer at a European financial institution with US correspondent accounts, you receive a notice from your US correspondent. |
| 5998d8dfc464-6418-4229-9b97-c9128074ed5a | Not Translated (0%) | What should you do? | What should you do? |
| 59998bc6cac1-2932-41c7-8b76-a0f856f8d941 | Not Translated (0%) | Ensure you do not comply with regulations as this would violate the EU blocking regulations. | Ensure you do not comply with regulations as this would violate the EU blocking regulations. |
| 6000b4c9bbd2-814c-4287-8c05-2e90352df82f | Not Translated (0%) | Begin exiting your bank from any relationships with the designated Russian target. | Begin exiting your bank from any relationships with the designated Russian target. |
| 6001b1533cf8-2e6c-49db-bcca-67b22bd0d853 | Not Translated (0%) | Consult the bank’s policy on Special Measures. | Consult the bank’s policy on Special Measures. |
| 6002f973bb21-6dba-4fb9-95a4-ecc4e344d0ae | Not Translated (0%) | Escalate the notice to senior management and general counsel. | Escalate the notice to senior management and general counsel. |
| 60032673e3d9-0899-48d1-8130-b2872d18d16f | Not Translated (0%) | Countries with strategic deficiencies in their anti-money laundering and counterterrorism financing regimes are placed on which of the following maintained by FATF? | Countries with strategic deficiencies in their anti-money laundering and counterterrorism financing regimes are placed on which of the following maintained by FATF? |
| 60047dff7f87-63c5-4b1e-9c21-702b91777a96 | Not Translated (0%) | Blacklist | Blacklist |
| 6005de0a4e1e-6196-4dd3-bb28-0cbbad6834db | Not Translated (0%) | Blocked Persons list | Blocked Persons list |
| 60065076f060-9f72-4cc5-8007-8c42e53bdc96 | Not Translated (0%) | Greylist | Greylist |
| 6007e29b5393-43f6-4f44-b130-ed84aa3a9879 | Not Translated (0%) | Civil penalties | Civil penalties |
| 6008c43cc5f2-de64-4327-92bc-ac7d5c423015 | Not Translated (0%) | Which of the following statements is true? | Which of the following statements is true? |
| 60094e6d4c00-3c91-41d7-9ae3-a55369d3750a | Not Translated (0%) | The European Union makes general exceptions for acts that are personal in nature. | The European Union makes general exceptions for acts that are personal in nature. |
| 60103483c270-17cd-4e2b-85fb-84c8bef54b6a | Not Translated (0%) | The United Nations has the most sanctions regimes. | The United Nations has the most sanctions regimes. |
| 60111d23d0f4-2454-49f5-9ba6-eb814f619bcf | Not Translated (0%) | The European Union only implements United Nations sanctions. | The European Union only implements United Nations sanctions. |
| 6012f824d659-fe59-478d-8413-ae7442814e89 | Not Translated (0%) | United States sanctions require periodic evaluation and renewal. | United States sanctions require periodic evaluation and renewal. |
| 60136260573d-c130-44a2-9f11-b16a05bd4f65 | Not Translated (0%) | OFAC’s “A Framework for OFAC Compliance Commitments” document identifies which of the following as the first of five essential compliance components? | OFAC’s “A Framework for OFAC Compliance Commitments” document identifies which of the following as the first of five essential compliance components? |
| 601421cba436-6d34-47c9-9cfd-1174871fff68 | Not Translated (0%) | Adequate resources | Adequate resources |
| 60153b2a304d-4906-419c-96b4-fcc9c9f0ae7f | Not Translated (0%) | Management commitment | Management commitment |
| 601660ed57a6-d00b-487f-8a31-69b620ef2924 | Not Translated (0%) | Empowered personnel | Empowered personnel |
| 6017b6ed5d3d-3c77-4512-b2d8-52f57e8714af | Not Translated (0%) | Culture of compliance | Culture of compliance |
| 6018505b3260-df0f-45d3-bc09-3fbd9582a880 | Not Translated (0%) | According to the Wolfsberg Group, the key purpose of a risk assessment is to drive improvements in financial crime risk management through identifying: | According to the Wolfsberg Group, the key purpose of a risk assessment is to drive improvements in financial crime risk management through identifying: |
| 60193c79a7c7-5ed2-42e0-893a-bb35ba985277 | Not Translated (0%) | the procedures and policies used to screen customers. | the procedures and policies used to screen customers. |
| 6020198e7c17-77ac-46eb-a77f-e9a97d5b07d5 | Not Translated (0%) | the ultimate beneficial owner of customers. | the ultimate beneficial owner of customers. |
| 602148b76abf-3482-4edb-b45b-e4bcd03d1912 | Not Translated (0%) | the ways in which general and specific sanctions risks are mitigated by a firm’s sanctions compliance program controls. | the ways in which general and specific sanctions risks are mitigated by a firm’s sanctions compliance program controls. |
| 60220ec58965-5869-4647-b840-e5cad31ce8c0 | Not Translated (0%) | the risk appetite of the financial institution. | the risk appetite of the financial institution. |
| 60236d6d5fe8-f3d3-46a3-98f8-ffbfb42f28e3 | Not Translated (0%) | Which of the following is true regarding the determination of a financial institution’s risk appetite? | Which of the following is true regarding the determination of a financial institution’s risk appetite? |
| 602407b775da-48ac-43f4-bacb-5d67be6dc8fe | Not Translated (0%) | The firm first needs to define what it considers to be high, medium, and low risk for customers, products/services, countries, and delivery channels. | The firm first needs to define what it considers to be high, medium, and low risk for customers, products/services, countries, and delivery channels. |
| 602508e5cecc-7b5f-46a2-980f-4b1bab763113 | Not Translated (0%) | What is considered low risk for AML purposes generally is considered low risk for sanctions compliance. | What is considered low risk for AML purposes generally is considered low risk for sanctions compliance. |
| 602657969f03-14f9-4eed-a168-6bc3ed471c90 | Not Translated (0%) | Country risk ratings for AML always should be included in the sanctions risk assessment. | Country risk ratings for AML always should be included in the sanctions risk assessment. |
| 60273985d930-3fa9-4104-9840-acc2f7c480e1 | Not Translated (0%) | The firm needs to determine whether thresholds in its filtering process will need to be adjusted to accommodate current resources. | The firm needs to determine whether thresholds in its filtering process will need to be adjusted to accommodate current resources. |
| 6028d9f5931d-ba46-4884-8ee8-bc40b4e2c967 | Not Translated (0%) | What are the components of the risk formula suggested by the Wolfsberg Group for sanctions risk assessment? | What are the components of the risk formula suggested by the Wolfsberg Group for sanctions risk assessment? |
| 602992f51ac2-0b6f-4094-9740-95c7ac16d0e3 | Not Translated (0%) | Customers, products/services, countries, and delivery channels | Customers, products/services, countries, and delivery channels |
| 6030f417c06f-1020-40d4-ba7a-70e43b594f82 | Not Translated (0%) | Risk assessment, risk appetite, and institutional resources | Risk assessment, risk appetite, and institutional resources |
| 6031b8f5baf5-7b29-457e-bcdf-3486d19cb61e | Not Translated (0%) | Inherent risk, policies/procedures, and internal controls | Inherent risk, policies/procedures, and internal controls |
| 60327e4c7cd3-b7e7-4066-b9fb-53c57f589fae | Not Translated (0%) | Inherent risk, control effectiveness, and residual risk | Inherent risk, control effectiveness, and residual risk |
| 60331c848073-e4b3-473f-a963-8a01ab07965c | Not Translated (0%) | Which of the following statements is accurate concerning inherent risk as a component of a risk assessment? | Which of the following statements is accurate concerning inherent risk as a component of a risk assessment? |
| 60345fc10504-8de6-4824-97de-46d7cb1f68fc | Not Translated (0%) | Inherent risk is the level of sanctions risk that exists after controls are applied. | Inherent risk is the level of sanctions risk that exists after controls are applied. |
| 60350ce7a1e6-07a9-4ff9-92b3-c2393724a5b6 | Not Translated (0%) | The four main inherent risk categories are customers, policies and procedures, geography/jurisdiction, and delivery channels. | The four main inherent risk categories are customers, policies and procedures, geography/jurisdiction, and delivery channels. |
| 603692700792-56fb-4189-a25e-681136838282 | Not Translated (0%) | The level of inherent risk is determined by examining the probability of occurrence and the severity of the impact of sanctions violation. | The level of inherent risk is determined by examining the probability of occurrence and the severity of the impact of sanctions violation. |
| 603766d0769d-c7c4-485a-b48f-964c6120213c | Not Translated (0%) | Customers are the most highly weighted aspect of inherent risk. | Customers are the most highly weighted aspect of inherent risk. |
| 603802acbdb3-f015-4003-9bf7-e6ccf7a36b26 | Not Translated (0%) | Which of the following is a way in which a customer’s delivery channels might increase a financial institution’s inherent risk? | Which of the following is a way in which a customer’s delivery channels might increase a financial institution’s inherent risk? |
| 6039083384d6-0937-4594-8f7b-029a1637abee | Not Translated (0%) | The customer’s delivery channel processes payments slowly in order to impede investigations. | The customer’s delivery channel processes payments slowly in order to impede investigations. |
| 60400c27f3c0-8ef6-41db-87ce-93f4b960c9c6 | Not Translated (0%) | The affiliate providing the due diligence on the customer is in a jurisdiction with low compliance standards. | The affiliate providing the due diligence on the customer is in a jurisdiction with low compliance standards. |
| 6041a3f140da-65e5-4bc6-8837-0635535840f5 | Not Translated (0%) | The customer conceals its identity by using complex entities and/or shell companies. | The customer conceals its identity by using complex entities and/or shell companies. |
| 604295e86eb4-561f-4946-b2d8-8136db92dd4a | Not Translated (0%) | The customer transfers product ownership without the knowledge of the financial institution. | The customer transfers product ownership without the knowledge of the financial institution. |
| 604370615e4d-0cc8-4d35-b171-fc5acac036ee | Not Translated (0%) | Which of the following is an example of controls used within a sanctions compliance program to mitigate its inherent risks? | Which of the following is an example of controls used within a sanctions compliance program to mitigate its inherent risks? |
| 60443d508df6-4e5d-4681-ac1f-abe5e19297d6 | Not Translated (0%) | Regulatory exams | Regulatory exams |
| 6045a7ec16a1-9201-455f-8c55-3fbe2ba65d53 | Not Translated (0%) | Management commitment | Management commitment |
| 6046a4a9323a-b011-42ac-bb57-f39ab70fbe3a | Not Translated (0%) | Risk-assessment tools | Risk-assessment tools |
| 6047f1711cc6-936f-48e7-84d2-068777d0ce12 | Not Translated (0%) | Independent testing | Independent testing |
| 60480c3054af-135e-4c18-8bf8-29b6e78aea3b | Not Translated (0%) | Which of the following statements is accurate concerning a financial institution’s residual risk? | Which of the following statements is accurate concerning a financial institution’s residual risk? |
| 604955482df5-9d35-418a-9f73-91941b4d8ff4 | Not Translated (0%) | The firm assesses its residual risk and then determines its risk appetite. | The firm assesses its residual risk and then determines its risk appetite. |
| 60508e8e507f-a78d-4d47-86d9-87870ae76f0e | Not Translated (0%) | The firm can transfer, avoid, further mitigate, or accept its residual risk. | The firm can transfer, avoid, further mitigate, or accept its residual risk. |
| 60510f5ebfc1-6277-41f3-8eed-74be4721c806 | Not Translated (0%) | The firm’s residual risk increases along with control effectiveness. | The firm’s residual risk increases along with control effectiveness. |
| 6052e076966f-362e-41eb-b115-d44088daa61e | Not Translated (0%) | The firm’s residual risk increases as inherent risk decreases. | The firm’s residual risk increases as inherent risk decreases. |
| 6053a55a0e24-34ce-4300-ac5a-7dacca21db98 | Not Translated (0%) | In large, complex financial institutions, why is it important for risk assessments to be conducted across various assessment units, with all lines of business contributing to the overall risk assessment? | In large, complex financial institutions, why is it important for risk assessments to be conducted across various assessment units, with all lines of business contributing to the overall risk assessment? |
| 60546c8d273c-fb0b-46dd-b74f-b5d51a861e01 | Not Translated (0%) | The larger the firm, the more complex the risk assessment process and the longer it will take. | The larger the firm, the more complex the risk assessment process and the longer it will take. |
| 60557bb9ab84-8a4a-4885-91ab-53a098628225 | Not Translated (0%) | Eventually, this method ensures that residual risk is spread among the various units. | Eventually, this method ensures that residual risk is spread among the various units. |
| 6056680013a4-2c21-4b1b-9c8c-119e8929a62e | Not Translated (0%) | Identifying the assessment units and determining how they combine with one another is important for an accurate and thorough risk assessment. | Identifying the assessment units and determining how they combine with one another is important for an accurate and thorough risk assessment. |
| 60577035b40f-74e0-4f5c-bb41-23d5cd371825 | Not Translated (0%) | This method ensures consistency in risk assessments for large institutions from a global standpoint. | This method ensures consistency in risk assessments for large institutions from a global standpoint. |
| 6058318b93b6-6b64-4f37-acb2-c6b1db4db7e7 | Not Translated (0%) | Staying current with the political climate, requiring vendors to provide updated information, monitoring government websites through subscriptions, and creating tailored news alerts are ways in which a firm can: | Staying current with the political climate, requiring vendors to provide updated information, monitoring government websites through subscriptions, and creating tailored news alerts are ways in which a firm can: |
| 6059c42644c2-f2b3-48f7-adf1-d5299ab0c4a0 | Not Translated (0%) | manage its control effectiveness. | manage its control effectiveness. |
| 6060fded534f-3590-4080-af1a-f2d259f83148 | Not Translated (0%) | stay current on sanctions. | stay current on sanctions. |
| 606186e2c2be-4182-4613-836b-9a25cbd433f9 | Not Translated (0%) | ensure an accurate risk assessment. | ensure an accurate risk assessment. |
| 6062e8741737-0659-4be6-911a-7de4cf65b1d5 | Not Translated (0%) | conduct timely testing and auditing. | conduct timely testing and auditing. |
| 6063453087a0-2a89-4431-9bd2-67b4a9341f8b | Not Translated (0%) | What is the role of policies and procedures as aspects of an institution’s sanctions compliance program? | What is the role of policies and procedures as aspects of an institution’s sanctions compliance program? |
| 606462e591a1-0be3-46d6-a52a-1386e0b42967 | Not Translated (0%) | They communicate to regulators an institution’s residual risk compared with its risk appetite. | They communicate to regulators an institution’s residual risk compared with its risk appetite. |
| 6065f4a94b18-4b32-4352-b6c0-6de543740fde | Not Translated (0%) | They identify, interdict, escalate, report, and maintain records concerning potentially prohibited activities. | They identify, interdict, escalate, report, and maintain records concerning potentially prohibited activities. |
| 6066ea278aec-8ce0-49b8-a8a2-8a502ea94933 | Not Translated (0%) | They provide stability and consistency for institutions by memorializing in writing process and practices for employees to follow. | They provide stability and consistency for institutions by memorializing in writing process and practices for employees to follow. |
| 6067bf037270-1012-4a07-ac4d-bf64e843cd25 | Not Translated (0%) | They alert the sanctions compliance team to potential outliers or deviations that may need to be reviewed. | They alert the sanctions compliance team to potential outliers or deviations that may need to be reviewed. |
| 6068db042184-24e2-42cb-9377-ffecd3c6fe86 | Not Translated (0%) | Which of the following statements reflects the role of the independent audit in a financial institution’s sanctions compliance program? | Which of the following statements reflects the role of the independent audit in a financial institution’s sanctions compliance program? |
| 606912eab261-bb06-4c3c-a99a-2231c7eb9a47 | Not Translated (0%) | Auditing assesses the overall integrity and effectiveness of the compliance program, including policies, procedures, and processes. | Auditing assesses the overall integrity and effectiveness of the compliance program, including policies, procedures, and processes. |
| 60700c459ab3-16d6-4fa0-9f04-3fd88710f54d | Not Translated (0%) | Auditing must be undertaken prior to implementing the program. | Auditing must be undertaken prior to implementing the program. |
| 607115a375ce-1dbb-4376-8058-4f178da92d86 | Not Translated (0%) | Because it is independent, auditing does not address regulatory requirements. | Because it is independent, auditing does not address regulatory requirements. |
| 6072d7c126d6-c03b-4c57-9655-fd4f0364a146 | Not Translated (0%) | The independent audit incorporates small-scale audits from third parties. | The independent audit incorporates small-scale audits from third parties. |
| 60737775a76d-4db9-4230-86d1-5098bd972517 | Not Translated (0%) | An effective employee training program is an integral component of a successful sanctions compliance program and generally should: | An effective employee training program is an integral component of a successful sanctions compliance program and generally should: |
| 6074ffde2390-d08d-4243-a268-a60a868314e5 | Not Translated (0%) | demonstrate how to calibrate an AST threshold. | demonstrate how to calibrate an AST threshold. |
| 60754e63bb5d-656d-4a9e-b327-27dc22cda452 | Not Translated (0%) | communicate the role of the sanctions compliance department in managing and owning the sanctions risk. | communicate the role of the sanctions compliance department in managing and owning the sanctions risk. |
| 6076fe6bf4e7-cc88-449c-97c6-6279dbb29bf4 | Not Translated (0%) | hold employees accountable for sanctions compliance training through assessments. | hold employees accountable for sanctions compliance training through assessments. |
| 607755fd7032-5e1a-41d5-995e-0b137ea07739 | Not Translated (0%) | protect employees from personal accountability for ensuring sanctions compliance. | protect employees from personal accountability for ensuring sanctions compliance. |
| 607864ea5882-f76b-482f-8699-98e43c2ee6f3 | Not Translated (0%) | As a sanctions regime in the United States, what is one of the purposes of the Office of Foreign Assets Control (OFAC)? | As a sanctions regime in the United States, what is one of the purposes of the Office of Foreign Assets Control (OFAC)? |
| 6079b877fe6b-b401-4243-87ec-823171831c8a | Not Translated (0%) | It enacts and regulates sanctions to mitigate threats to national security, foreign policy, and the US economy. | It enacts and regulates sanctions to mitigate threats to national security, foreign policy, and the US economy. |
| 60808b757b6f-5f39-4764-b6f0-571da66841af | Not Translated (0%) | It fulfills Common Foreign and Security Policy objectives. | It fulfills Common Foreign and Security Policy objectives. |
| 608180442575-a984-4d60-961f-bf81791fdb30 | Not Translated (0%) | It tests UN Security Council resolutions. | It tests UN Security Council resolutions. |
| 60826f58aaed-af4d-4dd9-b3c9-81584fa05b61 | Not Translated (0%) | It enforces the Foreign Corrupt Practices Act (FCPA) | It enforces the Foreign Corrupt Practices Act (FCPA) |
| 60834625dc77-08dc-4a58-af75-ff8b60843db4 | Not Translated (0%) | The European Union sanctions regime comprises which of the following? | The European Union sanctions regime comprises which of the following? |
| 6084c4ebd34d-a5eb-4548-96ab-db59337f7bf4 | Not Translated (0%) | All sanctions imposed by the UN Security Council | All sanctions imposed by the UN Security Council |
| 60856b5a5c0e-fbef-4099-911f-26c9ba146a3c | Not Translated (0%) | All sanctions imposed by the Bureau of Industry and Security and the UN Security Council | All sanctions imposed by the Bureau of Industry and Security and the UN Security Council |
| 60860fa40256-c017-4df8-aa2c-b95d44a4f0b5 | Not Translated (0%) | All sanctions imposed by Office of Foreign Assets Control and the UN Security Council | All sanctions imposed by Office of Foreign Assets Control and the UN Security Council |
| 6087b8048c4a-3c38-4383-9c14-17f1feb09309 | Not Translated (0%) | All sanctions imposed by the Common Foreign Security Policy Council and published in the Official Journal of the European Union, and all sanctions imposed by the UN Security Council | All sanctions imposed by the Common Foreign Security Policy Council and published in the Official Journal of the European Union, and all sanctions imposed by the UN Security Council |
| 6088cac79437-cd90-4e27-ac24-190f2cd425a4 | Not Translated (0%) | Instructor | Instructor |
| 608948c2d34c-6d2f-4167-b054-81b0f585865c | Not Translated (0%) | Student | Student |
| 609057f9d950-6ed7-4c92-834d-46a4b7703657 | Not Translated (0%) | <14875>Module</14875> Review: | <14875>Module</14875> Review: |
| 609157f9d950-6ed7-4c92-834d-46a4b7703657 | Not Translated (0%) | Sanctions Evasion Techniques | Sanctions Evasion Techniques |
| 6092ef2ff36b-fc59-484a-bef3-b3faaecfce7b | Not Translated (0%) | Which US agencies are responsible for issuing licenses that allow financial institutions to do business with companies or organizations that are under sanction? | Which US agencies are responsible for issuing licenses that allow financial institutions to do business with companies or organizations that are under sanction? |
| 609382d795de-e3f1-4d0d-a29f-a523071a214b | Not Translated (0%) | The Office of Foreign Assets Control (OFAC) and the Bureau of Industry and Security (BIS) | The Office of Foreign Assets Control (OFAC) and the Bureau of Industry and Security (BIS) |
| 6094fb67d874-205b-44bd-ab43-58ee06065bc8 | Not Translated (0%) | The Bureau of Sanctions Management (BSM) and the Office of Sanctions Control and Implementation (OSCI) | The Bureau of Sanctions Management (BSM) and the Office of Sanctions Control and Implementation (OSCI) |
| 6095a3673fd1-803a-47a7-93af-b3cc248c616f | Not Translated (0%) | The Bureau of Sanctions and Industry (BSI) and the Office of Financial Security Management (OFSM) | The Bureau of Sanctions and Industry (BSI) and the Office of Financial Security Management (OFSM) |
| 6096bbebff3c-b9dd-48ab-89e3-c0e2b8bbaec4 | Not Translated (0%) | The Central Import and Export Office (CIEO) and the Office of Financial Sanctions Implementation (OFSI) | The Central Import and Export Office (CIEO) and the Office of Financial Sanctions Implementation (OFSI) |
| 6097a3d08610-4182-42bd-a6a7-197745f621eb | Not Translated (0%) | The United States and the European Union have imposed sanctions on Company X. The company’s owners try to evade the sanctions by reducing their holdings in Company X to less than 50%. | The United States and the European Union have imposed sanctions on Company X. The company’s owners try to evade the sanctions by reducing their holdings in Company X to less than 50%. |
| 6098a3d08610-4182-42bd-a6a7-197745f621eb | Not Translated (0%) | What is this evasion technique called? | What is this evasion technique called? |
| 6099fdf1d1be-dbd6-4b07-bf6d-399cb277b4fb | Not Translated (0%) | Establishment of a single-layer corporate structure | Establishment of a single-layer corporate structure |
| 6100cbe289da-f601-4fec-aa43-bc91b3f4d245 | Not Translated (0%) | Violation of the holdings rule | Violation of the holdings rule |
| 610100b2049f-90db-42c7-bdbf-1eedae17f4d1 | Not Translated (0%) | Dilution of sanctioned ownership | Dilution of sanctioned ownership |
| 6102935f70e4-17a8-4476-990d-3963d79c8dcf | Not Translated (0%) | Abuse of proxies and shell corporations | Abuse of proxies and shell corporations |
| 6103ec7acd2d-3b3c-4937-8e88-25eb04878918 | Not Translated (0%) | How long does a counterparty relationship last? | How long does a counterparty relationship last? |
| 61046bdc5c5e-66b4-4a6b-894c-0739fba87476 | Not Translated (0%) | Throughout the customer onboarding process | Throughout the customer onboarding process |
| 6105ccad5a37-0be5-4e9d-a75c-dd8c014fb475 | Not Translated (0%) | For the life of the transaction | For the life of the transaction |
| 6106c1a72778-63e1-4e59-945e-7f27c0c59e96 | Not Translated (0%) | Until all governments have lifted sanctions | Until all governments have lifted sanctions |
| 61078fcc2974-73c4-4e92-bd6c-8db3f66a6f1b | Not Translated (0%) | For the term of the contract defining the counterparty relationship | For the term of the contract defining the counterparty relationship |
| 6108d2116797-a617-4ceb-9b7b-e7b80cb54a01 | Not Translated (0%) | A bank employee completes a transaction for a company that is under EU sanctions. | A bank employee completes a transaction for a company that is under EU sanctions. |
| 6109d2116797-a617-4ceb-9b7b-e7b80cb54a01 | Not Translated (0%) | The employee does this by routing the payment through a bank that is outside the EU and removing the relevant information from the payment method. | The employee does this by routing the payment through a bank that is outside the EU and removing the relevant information from the payment method. |
| 6110d2116797-a617-4ceb-9b7b-e7b80cb54a01 | Not Translated (0%) | What is the name of this type of sanctions evasion? | What is the name of this type of sanctions evasion? |
| 611150697e4a-6254-4b3d-af36-c3ac329c5fa7 | Not Translated (0%) | External evasion | External evasion |
| 6112dfb9ce12-067a-4d59-b90f-952be6d19873 | Not Translated (0%) | Specially designated national | Specially designated national |
| 611316e3e3eb-54b4-4fa0-a3e8-682b35fb0034 | Not Translated (0%) | Double stripping | Double stripping |
| 6114e75537de-4a26-4d0c-86bf-41bbf5a98c7e | Not Translated (0%) | Stripping | Stripping |
| 6115f7125abe-59df-4287-abfc-31f54de57b0a | Not Translated (0%) | Why is it necessary for a financial institution to review its whitelists regularly? | Why is it necessary for a financial institution to review its whitelists regularly? |
| 61163594bd27-a9ba-426f-b2b2-13abc6f23b2b | Not Translated (0%) | A staffer may intentionally add a sanctioned individual or institution. | A staffer may intentionally add a sanctioned individual or institution. |
| 6117a88ffcf9-b2f1-4627-9f56-aa1613dc814d | Not Translated (0%) | A staffer may accidentally include a false positive result on a whitelist. | A staffer may accidentally include a false positive result on a whitelist. |
| 611881c610f3-77b0-4a12-ab33-bdedbc1f26f8 | Not Translated (0%) | US regulations require whitelist checks at least four times per year. | US regulations require whitelist checks at least four times per year. |
| 6119e94fb113-61f5-4a8f-a609-6217552215c4 | Not Translated (0%) | EU regulations require whitelist checks at least every six months. | EU regulations require whitelist checks at least every six months. |
| 612010abed7d-9595-4c04-a985-cd54224542d0 | Not Translated (0%) | Which types of SWIFT messages do banks usually send together? | Which types of SWIFT messages do banks usually send together? |
| 61212566ca3c-0b64-4096-852d-53d4add1bbbe | Not Translated (0%) | MT103COV and MT202COV | MT103COV and MT202COV |
| 61228a5c0e57-8168-464b-b781-481e829f87b4 | Not Translated (0%) | MT103 and MT202 | MT103 and MT202 |
| 612334916aad-2d36-4d1c-b57a-68943946052c | Not Translated (0%) | MT202 and MT202COV | MT202 and MT202COV |
| 612436b3aa5c-e62b-451f-acfe-22d18ed88345 | Not Translated (0%) | MT103 and MT202COV | MT103 and MT202COV |
| 61250ed6c45e-d3e7-487d-b7bc-3b6343db2a96 | Not Translated (0%) | Which of the following tactics do people use to avoid detection during sanctions payment screening? | Which of the following tactics do people use to avoid detection during sanctions payment screening? |
| 61268c232e6f-6df2-40e2-9a61-5660d59031fa | Not Translated (0%) | Using a bank identifier code assigned to a bank in a sanctioned country | Using a bank identifier code assigned to a bank in a sanctioned country |
| 6127b052f2d2-1cd0-4777-89f0-e589e72a8125 | Not Translated (0%) | Rearranging the data when they know a bank screens all fields of a form | Rearranging the data when they know a bank screens all fields of a form |
| 6128d5045bdd-3823-4fa0-9a61-a2eb033a1d3b | Not Translated (0%) | Using unusual combinations of characters, such as #!$#!$ | Using unusual combinations of characters, such as #!$#!$ |
| 61291436a879-2d9f-4198-b5af-4132d414fbe3 | Not Translated (0%) | Leaving a message untouched before sending it to another bank | Leaving a message untouched before sending it to another bank |
| 61300065e098-a82b-4d04-9929-622fb788afcf | Not Translated (0%) | In March 2015, Commerzbank agreed to pay $1.45 billion in fines for violation of US laws and New York state law. | In March 2015, Commerzbank agreed to pay $1.45 billion in fines for violation of US laws and New York state law. |
| 61310065e098-a82b-4d04-9929-622fb788afcf | Not Translated (0%) | Which of these actions would likely have resulted in a lower fine? | Which of these actions would likely have resulted in a lower fine? |
| 6132cf15f1d5-9586-4abf-a48e-11168a4f38f9 | Not Translated (0%) | Commerzbank’s US employees having completed the voluntary self-disclosures | Commerzbank’s US employees having completed the voluntary self-disclosures |
| 6133e0519078-6b63-4a2b-93de-6e104ff75f0e | Not Translated (0%) | Commerzbank’s US employees having followed the compliance culture of the company’s European employees | Commerzbank’s US employees having followed the compliance culture of the company’s European employees |
| 6134f75c7ce3-555c-4145-ae3c-99c24ac4912c | Not Translated (0%) | A more focused attempt by Commerzbank to reduce transparency across the company’s jurisdictions | A more focused attempt by Commerzbank to reduce transparency across the company’s jurisdictions |
| 613507097c8d-03c6-4678-87ce-cb34cf713b08 | Not Translated (0%) | A more focused attempt by the US-based offices to spot and block transactions | A more focused attempt by the US-based offices to spot and block transactions |
| 61362fa495c9-da49-49c4-adab-c4abc38d4697 | Not Translated (0%) | What lesson can financial professionals learn from the 2014 case of Alex and Gary Tsai? | What lesson can financial professionals learn from the 2014 case of Alex and Gary Tsai? |
| 613706e3df42-0db6-4392-8b38-9b13a2c38207 | Not Translated (0%) | Third-party due diligence systems, though useful, have little effect on this type of situation. | Third-party due diligence systems, though useful, have little effect on this type of situation. |
| 61384b65d17a-4b21-43e7-914c-12e4826d2fe3 | Not Translated (0%) | It is essential to have a thorough knowledge of a customer’s identity and his or her connection to other entities. | It is essential to have a thorough knowledge of a customer’s identity and his or her connection to other entities. |
| 613955a9120d-382a-478a-b406-ad2617faa692 | Not Translated (0%) | Shell companies and front companies are easy to detect when a financial institution has a compliance culture. | Shell companies and front companies are easy to detect when a financial institution has a compliance culture. |
| 614069635766-e09f-40bd-ae3a-3327d0f17882 | Not Translated (0%) | Financial professionals must understand that front companies are legal even though shell companies usually are not. | Financial professionals must understand that front companies are legal even though shell companies usually are not. |
| 61410f139146-16b5-4d6a-bca4-39cedbe5e1d4 | Not Translated (0%) | Why was the BNP Paribas case of May 2015 especially significant? | Why was the BNP Paribas case of May 2015 especially significant? |
| 6142697cd0af-670c-479b-81ee-cdbf17f525ba | Not Translated (0%) | It was one of the first in which individual executives were held personally liable but the bank was not. | It was one of the first in which individual executives were held personally liable but the bank was not. |
| 614337e2b2dc-c341-47f0-b843-4847e2a6e1a9 | Not Translated (0%) | It was the first time a US court convicted and sentenced a financial institution based on testimony from the World Bank. | It was the first time a US court convicted and sentenced a financial institution based on testimony from the World Bank. |
| 6144084af53f-ac31-4ecb-be4e-2e4b43562f0a | Not Translated (0%) | It was the first time a US court convicted and sentenced a financial institution for violating the country’s sanctions. | It was the first time a US court convicted and sentenced a financial institution for violating the country’s sanctions. |
| 6145c8bf4bbd-e689-455c-aa69-a0256f85bf4e | Not Translated (0%) | It was one of the first in which the financial institution was held responsible but its executives were not. | It was one of the first in which the financial institution was held responsible but its executives were not. |
| 61469d495ff9-340b-4971-b15b-1c5d3b17cbb2 | Not Translated (0%) | Which of the following is an important difference between AML regulations and sanctions? | Which of the following is an important difference between AML regulations and sanctions? |
| 6147b766a2a6-b104-4193-bfcf-fe4ef8655fe0 | Not Translated (0%) | AML targets exist everywhere in the world, but sanctions targets exist only in certain locations. | AML targets exist everywhere in the world, but sanctions targets exist only in certain locations. |
| 6148783de109-b9bd-4fcf-b72c-fc71268243ec | Not Translated (0%) | Sanctions generally have minimum transaction thresholds, and AML regulations do not. | Sanctions generally have minimum transaction thresholds, and AML regulations do not. |
| 61497564bdf8-7c9b-4b26-984f-d8eef3557a72 | Not Translated (0%) | AML regulations require screening of all transactions, and sanctions require screening of some transactions. | AML regulations require screening of all transactions, and sanctions require screening of some transactions. |
| 6150396a5606-814c-4d31-9590-65026ccd393e | Not Translated (0%) | In most cases, sanctions have an immediate legal effect, and AML regulations do not. | In most cases, sanctions have an immediate legal effect, and AML regulations do not. |
| 61511badaec4-3ca0-439c-b18c-f6c579e8e143 | Not Translated (0%) | Which of the following is an example of dual-use goods? | Which of the following is an example of dual-use goods? |
| 615203d2b5d6-2370-4e4f-96ef-29dbdb4d13e3 | Not Translated (0%) | Briefcases, handbags, and wallets | Briefcases, handbags, and wallets |
| 61534bee08ee-574f-4d81-8f9c-627f403fc29a | Not Translated (0%) | Lasers that have uses in medical technology and in the construction industry | Lasers that have uses in medical technology and in the construction industry |
| 6154c0d9ebce-ecd3-440a-bb71-effd36bdf181 | Not Translated (0%) | Video games that can be played on two or more platforms | Video games that can be played on two or more platforms |
| 615585a6b3f1-6527-461f-adee-8c98f0878653 | Not Translated (0%) | Translation software that is available in two or more languages or dialects | Translation software that is available in two or more languages or dialects |
| 6156337c4c88-0ea8-436e-be67-b569041b85be | Not Translated (0%) | Which of the following would be considered a red flag in a customer’s paperwork? | Which of the following would be considered a red flag in a customer’s paperwork? |
| 6157a719037a-7357-45eb-8a20-67b06cf0dd95 | Not Translated (0%) | The paperwork lists the address of a freight-forwarding firm as an interim destination. | The paperwork lists the address of a freight-forwarding firm as an interim destination. |
| 61583b7a3b12-1980-41e1-b0f1-8567160535e9 | Not Translated (0%) | The customer has included specific harbor entry dates even though delivery is nine days from now. | The customer has included specific harbor entry dates even though delivery is nine days from now. |
| 615964b1415a-0b7e-4144-82ee-479b3409410c | Not Translated (0%) | The paperwork states the shipment is of heavy machinery, but the shipment is refrigerated. | The paperwork states the shipment is of heavy machinery, but the shipment is refrigerated. |
| 6160005c8630-f8cd-47eb-a18d-1f9b42de1f08 | Not Translated (0%) | The customer lists the shipment contents as hardware, but there is no packaging for fragile items. | The customer lists the shipment contents as hardware, but there is no packaging for fragile items. |
| 61616969d43a-7ddc-47bc-8d7f-a9e0961eba7d | Not Translated (0%) | Automated screening tools can detect many red flags, but which of the following red flags usually requires human assessment to find? | Automated screening tools can detect many red flags, but which of the following red flags usually requires human assessment to find? |
| 6162bc228e1d-6bd5-4402-883e-0faf746f9fc7 | Not Translated (0%) | There is an abnormal shipping route for the product and destination. | There is an abnormal shipping route for the product and destination. |
| 61637b6aac01-9080-4197-895e-4600f0488892 | Not Translated (0%) | There are destinations outside the normal chain of custody. | There are destinations outside the normal chain of custody. |
| 616426b3fab8-cd69-4d80-a8bb-15f3f49a306d | Not Translated (0%) | The customer lacks a background in the export or trade business. | The customer lacks a background in the export or trade business. |
| 6165b8e7b221-5006-4dca-9c1e-93bc61b01fce | Not Translated (0%) | The customer details are similar to the BIS list of denied persons. | The customer details are similar to the BIS list of denied persons. |
| 616680e3cf85-56e6-47b2-a091-098666a96a55 | Not Translated (0%) | What was significant about the 2017 case of Access USA Shipping LLC? | What was significant about the 2017 case of Access USA Shipping LLC? |
| 6167b75833c6-188e-449d-be40-704c8ebc28f9 | Not Translated (0%) | The US government fined the company but not its chief executive officer. | The US government fined the company but not its chief executive officer. |
| 6168c53fb04a-a063-497b-a4f6-b5b2f9590493 | Not Translated (0%) | Access USA set up an internal straw buyer to help a client evade sanctions. | Access USA set up an internal straw buyer to help a client evade sanctions. |
| 616994178742-f2dd-4a7e-9940-f1bd29f9595c | Not Translated (0%) | The European Union pursued charges in the case, but the US government did not. | The European Union pursued charges in the case, but the US government did not. |
| 61706f7afe8b-027d-4dd4-9135-ad12bca0daf6 | Not Translated (0%) | Access USA set up a series of shell companies to help a client evade sanctions. | Access USA set up a series of shell companies to help a client evade sanctions. |
| 61717010f05d-2d05-4948-b9de-3d20f0bf4443 | Not Translated (0%) | What was significant about the Technopromexport case? | What was significant about the Technopromexport case? |
| 61729df456e6-8bc5-480c-bc33-a246517ef4cb | Not Translated (0%) | Technopromexport likely did not know the final destinations of the goods it shipped. | Technopromexport likely did not know the final destinations of the goods it shipped. |
| 61738e65ae23-7987-46ce-a979-47267c907445 | Not Translated (0%) | The case involved a private company concealing the export of dual-use goods. | The case involved a private company concealing the export of dual-use goods. |
| 617451ccc205-3af1-49d5-a317-0ccd94a88d72 | Not Translated (0%) | The case involved a state-owned company concealing the final destination of goods. | The case involved a state-owned company concealing the final destination of goods. |
| 617598ed767f-ba10-446f-9b77-186b720e1f9a | Not Translated (0%) | Technopromexport was a Chinese-owned company operating outside of China. | Technopromexport was a Chinese-owned company operating outside of China. |
| 61765fd2c2fa-cbb8-4124-b99f-f2260b75f0a2 | Not Translated (0%) | In which of these situations would transshipment most likely be legal? | In which of these situations would transshipment most likely be legal? |
| 617768e69763-bf6b-4e0c-b9b0-e20bcaafd740 | Not Translated (0%) | When a large ship cannot navigate a small river and goods must be moved from the ship to a fleet of trucks | When a large ship cannot navigate a small river and goods must be moved from the ship to a fleet of trucks |
| 61787d7ac529-3a2b-4543-ae3c-f683ce9e006b | Not Translated (0%) | When a company ships goods through a sanctioned country, but the goods have no end use or end user in that country | When a company ships goods through a sanctioned country, but the goods have no end use or end user in that country |
| 6179c6eba477-f495-4d14-bcd1-02a60139fb5d | Not Translated (0%) | When a company has an OFAC compliance program in place and does its best but mistakenly approves a transshipment | When a company has an OFAC compliance program in place and does its best but mistakenly approves a transshipment |
| 6180700e8221-76a3-4c08-87b6-225ac6943f6e | Not Translated (0%) | When a large ship turns off its transponders in order to transfer goods to smaller ships | When a large ship turns off its transponders in order to transfer goods to smaller ships |
| 618152267abe-f18b-4d93-96d8-f023f2bdba6e | Not Translated (0%) | A shipper conceals sanctioned goods by placing them underneath crates of vegetables that will be unsellable if held at port for too long or inspected too roughly. | A shipper conceals sanctioned goods by placing them underneath crates of vegetables that will be unsellable if held at port for too long or inspected too roughly. |
| 618252267abe-f18b-4d93-96d8-f023f2bdba6e | Not Translated (0%) | What is the name of this type of sanctions evasion? | What is the name of this type of sanctions evasion? |
| 61831a250719-d7b5-4cf3-b7c6-fbe9ce0c0ff5 | Not Translated (0%) | Incognito shipment | Incognito shipment |
| 6184faa4c626-40a5-41ed-8969-12c521b43075 | Not Translated (0%) | Straw shipment | Straw shipment |
| 61858a6d1e82-f100-4313-9165-c0a52eb30cf2 | Not Translated (0%) | Transshipment of goods | Transshipment of goods |
| 6186029a7d92-c952-4b43-be34-fcc3396578e6 | Not Translated (0%) | Consolidation of goods | Consolidation of goods |
| 6187dc98bbd8-d9da-4d6d-b03f-5f294854b3b2 | Not Translated (0%) | Instructor | Instructor |
| 61883265f7b5-4ebb-49c6-a3df-79737ebd0799 | Not Translated (0%) | Student | Student |
| 6189f3391f52-1806-4f7e-8c58-7b4c5535a04c | Not Translated (0%) | <15430>Module</15430> Review: | <15430>Module</15430> Review: |
| 6190f3391f52-1806-4f7e-8c58-7b4c5535a04c | Not Translated (0%) | Sanctions Due Diligence | Sanctions Due Diligence |
| 6191e04e6c24-8cc9-4376-a4e1-ed7f8bc7e3ca | Not Translated (0%) | What are the two components of the governance structure that support a financial institution’s sanctions compliance program? | What are the two components of the governance structure that support a financial institution’s sanctions compliance program? |
| 6192b3fbd4a0-c888-44b8-a526-589ed7a8e0f2 | Not Translated (0%) | The board of directors and the sanctions compliance officer | The board of directors and the sanctions compliance officer |
| 6193015ebbff-dfd3-49f9-82fc-5a402c3250ab | Not Translated (0%) | The board of directors and internal audit | The board of directors and internal audit |
| 6194c3da2b58-6b8c-4e08-bae4-3d219001b407 | Not Translated (0%) | The board of directors and the three lines of defense | The board of directors and the three lines of defense |
| 6195ef896c23-1bda-493f-9b43-7f4e2e2fd4e0 | Not Translated (0%) | The board of directors and OFAC | The board of directors and OFAC |
| 6196d5ebb438-7a4c-4f5e-8446-fc10d4d4d4a3 | Not Translated (0%) | Which of the following statements describes the first line of defense within the governance structure of a sanctions compliance program? | Which of the following statements describes the first line of defense within the governance structure of a sanctions compliance program? |
| 61978bf165f9-b4a9-47e2-95bd-e6bbef8a177a | Not Translated (0%) | It basically owns and manages the collection of sanctions due diligence (SDD) information. | It basically owns and manages the collection of sanctions due diligence (SDD) information. |
| 6198811e173d-bd2e-4dba-bb34-d58c48dd4fd0 | Not Translated (0%) | It includes the sanctions compliance officer and responsibility for ongoing monitoring for sanctions compliance. | It includes the sanctions compliance officer and responsibility for ongoing monitoring for sanctions compliance. |
| 61996724b316-b33c-40ea-ac05-c1a6b93d0280 | Not Translated (0%) | It ensures that SDD procedures and processes are designed properly, firmly established, and applied as intended. | It ensures that SDD procedures and processes are designed properly, firmly established, and applied as intended. |
| 62001203c841-db06-4fd1-bd29-a1158308e483 | Not Translated (0%) | It independently evaluates the risk management and controls of the bank through periodic assessments. | It independently evaluates the risk management and controls of the bank through periodic assessments. |
| 6201c91844c3-f159-4052-8539-e90b30140ff0 | Not Translated (0%) | It is important for the sanctions compliance officer (SCO) to be independent from the first line of defense: | It is important for the sanctions compliance officer (SCO) to be independent from the first line of defense: |
| 6202ed0c8f0f-033d-42e6-9fd4-ab815eb3aa62 | Not Translated (0%) | to successfully protect the firm’s data. | to successfully protect the firm’s data. |
| 6203caaf0b5a-47c7-4547-9764-d9326f6feb36 | Not Translated (0%) | to prevent conflicts of interest and facilitate unbiased advice and counsel. | to prevent conflicts of interest and facilitate unbiased advice and counsel. |
| 62043b8cd251-e0bd-45f7-9aba-381bd2ce12f7 | Not Translated (0%) | to ensure a thorough, unbiased internal audit. | to ensure a thorough, unbiased internal audit. |
| 62053ee024da-0c57-4daf-a902-5631a2b211a9 | Not Translated (0%) | to protect the SCO from interference from external authorities. | to protect the SCO from interference from external authorities. |
| 6206d57e3fff-9635-4cc0-8227-200a1af97d83 | Not Translated (0%) | How does the scope of KYC information used for sanctions compliance differ from that used for AML requirements? | How does the scope of KYC information used for sanctions compliance differ from that used for AML requirements? |
| 6207cf49fcc2-9cf8-4dac-b72e-52dd9c341ddb | Not Translated (0%) | Every element of a complete KYC program for AML purposes is directly relevant to a sanctions compliance program. | Every element of a complete KYC program for AML purposes is directly relevant to a sanctions compliance program. |
| 620877b80297-a6e3-486e-b4e5-927df011071b | Not Translated (0%) | The scope of KYC information used for sanctions compliance can be more limited than that for AML purposes. | The scope of KYC information used for sanctions compliance can be more limited than that for AML purposes. |
| 6209261335cb-f46a-4717-84d6-344b96fbca44 | Not Translated (0%) | AML KYC programs are focused on risk exposure emanating from the customer, whereas sanctions compliance focuses on the nature of the customer’s business. | AML KYC programs are focused on risk exposure emanating from the customer, whereas sanctions compliance focuses on the nature of the customer’s business. |
| 6210030ee437-c7de-4fa6-ad8f-fa8f9150c132 | Not Translated (0%) | AML KYC programs suffice for low-to medium-risk customers, but sanctions KYC programs are expanded to encompass high-risk customers. | AML KYC programs suffice for low-to medium-risk customers, but sanctions KYC programs are expanded to encompass high-risk customers. |
| 6211dc81afcf-75f0-48c6-a7aa-f2b204a1b335 | Not Translated (0%) | The three categories of key information to collect about customers are: | The three categories of key information to collect about customers are: |
| 62123134fd55-6b43-4a2b-8af5-52d0c8a323b3 | Not Translated (0%) | the customer, the beneficial owner, and the nature of business. | the customer, the beneficial owner, and the nature of business. |
| 6213ac22afca-6644-40f4-afdb-f02a6a976653 | Not Translated (0%) | the customer, the nature of business, and the products and services used. | the customer, the nature of business, and the products and services used. |
| 62145756269c-937b-469f-abbd-27e3a8997598 | Not Translated (0%) | the customer, the products and services, and the jurisdiction/geography. | the customer, the products and services, and the jurisdiction/geography. |
| 621594e2c2b5-c3f2-4716-bf24-23d156ddb296 | Not Translated (0%) | the customer, the jurisdiction, and the geographical scope. | the customer, the jurisdiction, and the geographical scope. |
| 6216074a2627-b709-4dc0-ba19-94d6f1deea6c | Not Translated (0%) | Which statement reflects the meaning of “control” with regard to the concept of beneficial ownership? | Which statement reflects the meaning of “control” with regard to the concept of beneficial ownership? |
| 6217b8d1d129-7a2b-4bf9-889d-47bfc2529597 | Not Translated (0%) | “Control” recognizes that a person in whose name an account is opened with a bank is not necessarily the person who ultimately controls such funds. | “Control” recognizes that a person in whose name an account is opened with a bank is not necessarily the person who ultimately controls such funds. |
| 6218c733fb4e-700a-4a82-85fa-b26137720daa | Not Translated (0%) | “Control” denotes the signatory authority or legal title. | “Control” denotes the signatory authority or legal title. |
| 62199d051e80-f5c5-4805-8f44-f430384ff0c9 | Not Translated (0%) | “Control” is the entity for which a high level of sanctions risk exists. | “Control” is the entity for which a high level of sanctions risk exists. |
| 622067de2f73-59cc-4470-917b-a8a8360ff02d | Not Translated (0%) | “Control” is separate from beneficial ownership. | “Control” is separate from beneficial ownership. |
| 6221e6e9941e-d381-4b8e-a3dd-7fc553a93fb2 | Not Translated (0%) | Which of the following statements is accurate concerning the concept of beneficial ownership? | Which of the following statements is accurate concerning the concept of beneficial ownership? |
| 622291dcc737-acf8-4d7e-aaca-66cde7a58499 | Not Translated (0%) | Beneficial ownership is only relevant for high-risk jurisdictions. | Beneficial ownership is only relevant for high-risk jurisdictions. |
| 6223fd701474-5331-458a-828d-9de536a7da06 | Not Translated (0%) | Beneficial ownership refers to the named signatory on an account, even if another party exercises control over the transaction. | Beneficial ownership refers to the named signatory on an account, even if another party exercises control over the transaction. |
| 62242f763cc9-9250-4f54-be04-0928f7f0fd9a | Not Translated (0%) | Beneficial ownership refers to the natural person(s) who ultimately owns or controls a customer and/or the natural person on whose behalf a transaction is being conducted. | Beneficial ownership refers to the natural person(s) who ultimately owns or controls a customer and/or the natural person on whose behalf a transaction is being conducted. |
| 622546327cc9-f9ab-4475-baf8-1442592712da | Not Translated (0%) | Knowledge about beneficial ownership is useful for financial institutions to have about a customer, but is not a regulator requirement. | Knowledge about beneficial ownership is useful for financial institutions to have about a customer, but is not a regulator requirement. |
| 6226999a54b1-39b7-4e82-84b4-da0f76488b51 | Not Translated (0%) | A financial institution can verify beneficial ownership information about a customer by: | A financial institution can verify beneficial ownership information about a customer by: |
| 6227b9b51271-4a90-41d3-9ba5-d4a6641c112f | Not Translated (0%) | requiring the customer to provide reliable documents, such as government-issued passports. | requiring the customer to provide reliable documents, such as government-issued passports. |
| 622807142aeb-7c86-4cee-a74f-65b20142c08b | Not Translated (0%) | searching the firm’s available databases for ownership information. | searching the firm’s available databases for ownership information. |
| 6229bdc16105-b58a-41e8-a88e-151bb5590f59 | Not Translated (0%) | requesting pertinent information from the customer’s legal advisors. | requesting pertinent information from the customer’s legal advisors. |
| 6230fb856c75-9ab8-4c70-b140-f990faccc6b9 | Not Translated (0%) | analyzing combined information from all of the customer’s data silos. | analyzing combined information from all of the customer’s data silos. |
| 6231d97c83f1-0f83-45d3-867e-6688f16244cc | Not Translated (0%) | Which of the following constitutes an operational challenge that can be encountered when attempting to identify beneficial owners? | Which of the following constitutes an operational challenge that can be encountered when attempting to identify beneficial owners? |
| 62321a6ccaa8-a6a6-4ee2-af01-2cb8878181bc | Not Translated (0%) | Lack of resources within the institution | Lack of resources within the institution |
| 6233ea625127-94d9-4d53-8e78-61330ce5c461 | Not Translated (0%) | Extraterritoriality issues with the sanctions regime | Extraterritoriality issues with the sanctions regime |
| 6234227541e2-6f5a-4571-8519-82079a6a15b8 | Not Translated (0%) | Lack of familiarity concerning sanctions regulations for some overseas jurisdictions | Lack of familiarity concerning sanctions regulations for some overseas jurisdictions |
| 6235053b7b7e-7388-466b-9796-ba72f907e212 | Not Translated (0%) | Unreliable information from a new customer | Unreliable information from a new customer |
| 6236af87867b-fce0-4818-9786-fd921ea140a0 | Not Translated (0%) | How is determining beneficial ownership for sanctions due diligence (SDD) different from determining beneficial ownership for anti-money laundering (AML) requirements in the United States? | How is determining beneficial ownership for sanctions due diligence (SDD) different from determining beneficial ownership for anti-money laundering (AML) requirements in the United States? |
| 6237716ec505-9a24-4728-a4d0-562b75434210 | Not Translated (0%) | Most AML requirements identify a beneficial owner as one that owns more than 20% of a legal entity, whereas OFAC applies a 45% rule to legal entity ownership for SDD. | Most AML requirements identify a beneficial owner as one that owns more than 20% of a legal entity, whereas OFAC applies a 45% rule to legal entity ownership for SDD. |
| 6238758c3973-5b43-4142-8d22-253437e0bd16 | Not Translated (0%) | Most AML requirements identify a beneficial owner as one that owns more than 50% of a legal entity, whereas OFAC applies a 25% rule to legal entity ownership for SDD. | Most AML requirements identify a beneficial owner as one that owns more than 50% of a legal entity, whereas OFAC applies a 25% rule to legal entity ownership for SDD. |
| 6239ef02b2a4-9a57-4ca3-9c8d-0678a100b802 | Not Translated (0%) | Most AML requirements identify a beneficial owner as one that owns more than 25% of a legal entity, whereas OFAC applies the 50 Percent Rule to legal entity ownership for SDD. | Most AML requirements identify a beneficial owner as one that owns more than 25% of a legal entity, whereas OFAC applies the 50 Percent Rule to legal entity ownership for SDD. |
| 62408731a68e-ced4-4fcd-ad4c-99ba6b27bad6 | Not Translated (0%) | Most AML requirements identify a beneficial owner as one that owns more than 75% of a legal entity, whereas OFAC applies a 25% rule to legal entity ownership for SDD. | Most AML requirements identify a beneficial owner as one that owns more than 75% of a legal entity, whereas OFAC applies a 25% rule to legal entity ownership for SDD. |
| 62415e4a645f-c5fd-4487-9ed0-fcc33b18b03c | Not Translated (0%) | How is the aggregate ownership of corporate structures affected by the OFAC 50 Percent Rule? | How is the aggregate ownership of corporate structures affected by the OFAC 50 Percent Rule? |
| 6242290ccebc-a230-498f-970d-fa0af7c98020 | Not Translated (0%) | If sanctioned person A both owns 25% of company A and also controls company A, company A is subject to sanctions. | If sanctioned person A both owns 25% of company A and also controls company A, company A is subject to sanctions. |
| 6243e0fb38da-f673-471c-af09-f0babd69d43b | Not Translated (0%) | If a parent company that is a sanctions target spreads out its ownership holdings of its affiliates, it is not subject to OFAC 50 Percent Rule. | If a parent company that is a sanctions target spreads out its ownership holdings of its affiliates, it is not subject to OFAC 50 Percent Rule. |
| 6244636438b4-6a9d-4858-99c4-6a12fe0e41a9 | Not Translated (0%) | If a company that is a sanctions target owns less than 50% of two or more legal entities, those entities are subject to the sanctions restrictions. | If a company that is a sanctions target owns less than 50% of two or more legal entities, those entities are subject to the sanctions restrictions. |
| 6245e35dce2f-e57e-4759-8025-b950cf58bdde | Not Translated (0%) | If sanctioned company A owns 70% of company B, and company B owns 70% of company C, and there are no other sanctioned ownership interests, then company C is not sanctioned because company A only owns 49% of company C. | If sanctioned company A owns 70% of company B, and company B owns 70% of company C, and there are no other sanctioned ownership interests, then company C is not sanctioned because company A only owns 49% of company C. |
| 62465e8a0775-215e-4ab4-9076-dc9767797ee0 | Not Translated (0%) | Which of the following is a significant difference between the EU’s European Best Practice Guidance and OFAC concerning sanctions due diligence and beneficial ownership? | Which of the following is a significant difference between the EU’s European Best Practice Guidance and OFAC concerning sanctions due diligence and beneficial ownership? |
| 62476811864a-1ee2-47e6-8b60-7c0295d03978 | Not Translated (0%) | The EU does not apply the aggregate rule to ownership interests separately maintained by sanctions targets. | The EU does not apply the aggregate rule to ownership interests separately maintained by sanctions targets. |
| 6248e8b78f90-5710-413d-a329-9f60c0608c2e | Not Translated (0%) | The EU’s rule applies when a sanctions target owns less than 50% of a legal entity. | The EU’s rule applies when a sanctions target owns less than 50% of a legal entity. |
| 624969d0d51a-b7b5-4e37-aa6c-654ae8a4caea | Not Translated (0%) | The EU rule does not apply to parties that may exert influence or control over an entity. | The EU rule does not apply to parties that may exert influence or control over an entity. |
| 6250c2552d77-58ef-47d7-b666-a5a457e3f724 | Not Translated (0%) | The EU rule supersedes the European AML directives regarding collecting customer due diligence. | The EU rule supersedes the European AML directives regarding collecting customer due diligence. |
| 6251b82cc7e0-41ad-4b94-90ca-5b2e0da25502 | Not Translated (0%) | Which of the following statements is accurate concerning knowing the nature of a customer’s business and its products and services for the purpose of sanctions due diligence (SDD)? | Which of the following statements is accurate concerning knowing the nature of a customer’s business and its products and services for the purpose of sanctions due diligence (SDD)? |
| 6252874b74b4-f827-4e67-a9d3-320706bb6b0e | Not Translated (0%) | A customer that is low risk for AML requirements is also low risk for SDD purposes. | A customer that is low risk for AML requirements is also low risk for SDD purposes. |
| 6253b8526fae-5682-425a-8983-cfd3d1f37f8f | Not Translated (0%) | Although the information is collected as part of the process of assessing AML risks, the way in which it is assessed for SDD is different. | Although the information is collected as part of the process of assessing AML risks, the way in which it is assessed for SDD is different. |
| 62548ebdd116-e9f0-4155-aaff-b260cb680bf8 | Not Translated (0%) | A customer that is low risk for AML requirements is highly likely to be higher risk for SDD purposes. | A customer that is low risk for AML requirements is highly likely to be higher risk for SDD purposes. |
| 6255a54e0b06-7da0-4931-92b3-058bae8c4ecb | Not Translated (0%) | Savvy businesses use information provided via a customer’s website and the Standard Industrial Classification (SIC) codes on the company registry to determine the nature of the business. | Savvy businesses use information provided via a customer’s website and the Standard Industrial Classification (SIC) codes on the company registry to determine the nature of the business. |
| 6256081ec51a-738c-4817-8ac9-393626477768 | Not Translated (0%) | Customers whose businesses involve trade-related activities warrant close attention in regard to the nature of business and products and services because: | Customers whose businesses involve trade-related activities warrant close attention in regard to the nature of business and products and services because: |
| 6257fc2c65f2-8d7d-4e4f-b1f0-36905edfae6b | Not Translated (0%) | trade activity involving goods from a low-risk jurisdiction translates to a high sanctions risk. | trade activity involving goods from a low-risk jurisdiction translates to a high sanctions risk. |
| 6258bbc28066-188e-47f3-876a-2962ac990a06 | Not Translated (0%) | cargo can be transferred from one ship or other form of transport to another via another country before arriving at its final destination. | cargo can be transferred from one ship or other form of transport to another via another country before arriving at its final destination. |
| 6259d2aa181f-d0ee-40e2-9abc-90e01f3b1840 | Not Translated (0%) | the sanctions risk profile of an intermediate jurisdiction can conceal that of the originating country. | the sanctions risk profile of an intermediate jurisdiction can conceal that of the originating country. |
| 626062737c57-e411-4217-be52-fff1737805f8 | Not Translated (0%) | the customer’s beneficial owner may reside in the intermediate jurisdiction. | the customer’s beneficial owner may reside in the intermediate jurisdiction. |
| 62610ca3afa9-9b32-4046-98fc-412c93a698f6 | Not Translated (0%) | Which item relates to a customer’s jurisdiction/geography as part of the customer’s sanctions risk profile? | Which item relates to a customer’s jurisdiction/geography as part of the customer’s sanctions risk profile? |
| 6262890b991a-7922-43c5-9ea7-b86c5bcaaaf3 | Not Translated (0%) | Activity of subsidiaries or affiliated third parties | Activity of subsidiaries or affiliated third parties |
| 6263e5a0be17-9554-4e73-88bc-c21b46e86b38 | Not Translated (0%) | Dual use of goods | Dual use of goods |
| 62642cc69454-182e-46cd-a2e3-40421ae8d7af | Not Translated (0%) | Travel for work and travel funding | Travel for work and travel funding |
| 62658bf4cdf6-9c5c-455f-b0c5-c66b1d4907ec | Not Translated (0%) | Insurance services that cover goods in a sanctioned country | Insurance services that cover goods in a sanctioned country |
| 6266a60920a2-d306-451d-b645-a8475668b6c4 | Not Translated (0%) | Which of the following is a common error/assumption made about sanctions due diligence? | Which of the following is a common error/assumption made about sanctions due diligence? |
| 6267751ccc5b-322d-404a-aa74-a71aec0e1307 | Not Translated (0%) | The sanctions risks associated with a customer’s affiliates or subsidiaries are not a problem for the customer to assess and manage. | The sanctions risks associated with a customer’s affiliates or subsidiaries are not a problem for the customer to assess and manage. |
| 6268d3ca1648-992a-4764-80d4-c39df1f8c203 | Not Translated (0%) | To detect attempts at evasion, you must know the nature, purpose, and structure of a customer and counterparty’s relationship. | To detect attempts at evasion, you must know the nature, purpose, and structure of a customer and counterparty’s relationship. |
| 6269e0667a50-62c9-4405-9be2-314a1d2efccc | Not Translated (0%) | Country risk exposure can be indirect and not directly linked to the customer’s country of location. | Country risk exposure can be indirect and not directly linked to the customer’s country of location. |
| 6270287d0c57-c39a-4ec1-a277-5be04d370fef | Not Translated (0%) | A customer that has no obvious presence in or direct link to a sanctioned country is a low sanctions risk. | A customer that has no obvious presence in or direct link to a sanctioned country is a low sanctions risk. |
| 627141a2d0aa-9e47-4abb-b18a-1aa683989fba | Not Translated (0%) | The four steps for gathering KYC information in the sanctions due diligence research model include: | The four steps for gathering KYC information in the sanctions due diligence research model include: |
| 6272a6848d64-0e43-44b9-a29b-876dc8cb1e5a | Not Translated (0%) | request, analyze, organize, and decide. | request, analyze, organize, and decide. |
| 627311246bad-3ae3-4fff-871e-b78b4c39c86b | Not Translated (0%) | assess, explore, organize, and present. | assess, explore, organize, and present. |
| 6274943324cb-1e97-4dca-aaa0-12e9ea37cf67 | Not Translated (0%) | identify, evaluate, correlate, and decide. | identify, evaluate, correlate, and decide. |
| 62752672e11d-a005-4c77-bab0-c2b35b5e2676 | Not Translated (0%) | assess, evaluate, correlate, and present. | assess, evaluate, correlate, and present. |
| 6276e57d3098-a8fb-48ca-b444-295edc3fd84f | Not Translated (0%) | Which of the following constitutes a known sanctions risk that is common in wealth management and private banking? | Which of the following constitutes a known sanctions risk that is common in wealth management and private banking? |
| 6277c5a1d08f-6e72-4c66-ae4a-ddef799e768e | Not Translated (0%) | Customers tend to be powerful clients or involved with powerful clients. | Customers tend to be powerful clients or involved with powerful clients. |
| 627882c67537-f0e3-4701-83d3-7ba483a1b10e | Not Translated (0%) | Customer wealth is typically consolidated in one jurisdiction/geographical location. | Customer wealth is typically consolidated in one jurisdiction/geographical location. |
| 62792ab12541-caf1-47f8-b6dc-5a9749b3ceb4 | Not Translated (0%) | Customers often hold assets in their name, thus concealing the identity of the true owner/controller. | Customers often hold assets in their name, thus concealing the identity of the true owner/controller. |
| 6280778d6e42-e36e-43c5-968d-f0f49e662474 | Not Translated (0%) | Customers keep banking information private by limiting relationships with external parties. | Customers keep banking information private by limiting relationships with external parties. |
| 62812cdf4873-ea92-4850-97d7-dc5abc448976 | Not Translated (0%) | Which of the following constitutes a known sanctions risk that is common in commercial and investment banking? | Which of the following constitutes a known sanctions risk that is common in commercial and investment banking? |
| 62820cb4f8c0-0360-4bb4-9a28-df8e34e5264f | Not Translated (0%) | The commercial or investment bank is typically the ultimate beneficial owner. | The commercial or investment bank is typically the ultimate beneficial owner. |
| 628342d61bab-3afd-4865-a53d-a822f9d07359 | Not Translated (0%) | Given the customers’ complex structures, tax residency cannot be determined. | Given the customers’ complex structures, tax residency cannot be determined. |
| 62847f52f9a5-7201-4f4d-a537-b298e43a1774 | Not Translated (0%) | Customers tend to use intermediaries. | Customers tend to use intermediaries. |
| 6285ad15866b-831b-4654-ab74-f74d8c4d6e00 | Not Translated (0%) | The financing of debt and equity is protected by sanctions restrictions. | The financing of debt and equity is protected by sanctions restrictions. |
| 628666231bfb-2a8c-4e9d-a253-e8ff0fed8c30 | Not Translated (0%) | Free trade zones are a key risk area in trade-related activities because: | Free trade zones are a key risk area in trade-related activities because: |
| 628778df4470-5fd7-47c1-a38c-80c7ebb51db2 | Not Translated (0%) | they commonly have inadequate sanctions safeguards and weak procedures to inspect goods and legal entities. | they commonly have inadequate sanctions safeguards and weak procedures to inspect goods and legal entities. |
| 6288b9c55830-acc6-4f1b-b229-7ab0c3f00af4 | Not Translated (0%) | they are often referred to by different names in different countries. | they are often referred to by different names in different countries. |
| 62890cf4d190-96ea-4d0b-af12-9cdaa35c340e | Not Translated (0%) | they are located in regional financial centers that link international trade hubs with access to global financial markets. | they are located in regional financial centers that link international trade hubs with access to global financial markets. |
| 62906062b37d-b149-42ee-964d-6636ef718395 | Not Translated (0%) | they are owned and controlled by countries that typically are sanctions targets. | they are owned and controlled by countries that typically are sanctions targets. |
| 6291096a9b65-86ac-4943-9a9a-3046bcbe9c29 | Not Translated (0%) | Why are sanctions risks potentially higher and more difficult to identify when financial institutions offer correspondent banking to other firms? | Why are sanctions risks potentially higher and more difficult to identify when financial institutions offer correspondent banking to other firms? |
| 62920ea5f75d-cd29-4272-84be-63a2a0bfd908 | Not Translated (0%) | Correspondent banking allows the institution to undertake international financial transactions for themselves and their customers. | Correspondent banking allows the institution to undertake international financial transactions for themselves and their customers. |
| 62933336a497-91d6-4599-895e-c6559aad432f | Not Translated (0%) | Correspondent banking is used for the execution of third-party payments and trade finance. | Correspondent banking is used for the execution of third-party payments and trade finance. |
| 6294683d052a-28e6-4dc9-a625-b3b057c67265 | Not Translated (0%) | The correspondent bank may provide services for individuals or entities for which it has neither verified the identities nor obtained any firsthand knowledge. | The correspondent bank may provide services for individuals or entities for which it has neither verified the identities nor obtained any firsthand knowledge. |
| 62953c6b0dbf-d70e-4c97-bd97-f60017e69b32 | Not Translated (0%) | Correspondent banks undertake SDD on their own customers, counterparties, intermediaries, suppliers, and end users. | Correspondent banks undertake SDD on their own customers, counterparties, intermediaries, suppliers, and end users. |
| 6296bd175f64-b120-4108-a9cf-d3671b76bc5c | Not Translated (0%) | Instructor | Instructor |
| 6297b7a0d873-16eb-439b-b397-cdc56e4b07e1 | Not Translated (0%) | Student | Student |
| 629836272589-9ceb-4f62-aacd-44d02aa76015 | Not Translated (0%) | <16075>Module</16075> Review: | <16075>Module</16075> Review: |
| 629936272589-9ceb-4f62-aacd-44d02aa76015 | Not Translated (0%) | Sanctions Screening | Sanctions Screening |
| 630072f06a61-0cb9-4a79-8349-966380453708 | Not Translated (0%) | Which occurs as a part of name screening? | Which occurs as a part of name screening? |
| 63017bb87598-5c15-4e2c-bf1a-06a9667e3360 | Not Translated (0%) | A firm screens customers after onboarding to collect SDD information. | A firm screens customers after onboarding to collect SDD information. |
| 630255799800-8fc9-4f3d-b8da-41e59568c78f | Not Translated (0%) | A firm uses predefined templates, codes, and acronyms to collect SDD information. | A firm uses predefined templates, codes, and acronyms to collect SDD information. |
| 6303f1329228-f38b-4b57-b480-b72b3e7098bf | Not Translated (0%) | A firm screens customer names when a red flag is raised and further enquiry is necessary. | A firm screens customer names when a red flag is raised and further enquiry is necessary. |
| 6304512c33a5-7a9c-4b26-8488-8a475dead422 | Not Translated (0%) | A firm’s entire customer database is screened by automatic screening tools on a periodic basis. | A firm’s entire customer database is screened by automatic screening tools on a periodic basis. |
| 6305582c2ca9-b9ed-4788-9897-9aa33e432e00 | Not Translated (0%) | Automated screening tools need to be configured correctly and then updated regularly to reflect: | Automated screening tools need to be configured correctly and then updated regularly to reflect: |
| 6306f066d8c1-0ccd-4ac2-bb4b-34c5b36716e1 | Not Translated (0%) | changes in employee training. | changes in employee training. |
| 630732ff47c9-900d-4a4a-9e82-46aa895ff83b | Not Translated (0%) | changes in the political landscape. | changes in the political landscape. |
| 6308e5bf1c4e-87a1-4410-b9bf-8ff1c15696c4 | Not Translated (0%) | new types of sanctions and revised regulations. | new types of sanctions and revised regulations. |
| 6309ba36cdc8-a194-40e1-bc63-510cd9fc5acd | Not Translated (0%) | vendor agreements. | vendor agreements. |
| 631082e2493e-430c-4650-b036-e4392e865239 | Not Translated (0%) | Which of the following represents a cost of automated screening when compared with manual screening? | Which of the following represents a cost of automated screening when compared with manual screening? |
| 63115c25f4ec-40df-448c-ab5b-fbfcc9e88693 | Not Translated (0%) | Documentation of results | Documentation of results |
| 6312254ba18e-2459-4b77-a170-5edee2d52ae3 | Not Translated (0%) | Resource intensiveness | Resource intensiveness |
| 6313af4b99f7-9902-4f3b-82b8-c254acc58bbc | Not Translated (0%) | Case management | Case management |
| 6314534a1a27-308d-4137-9903-d47f5ad505a0 | Not Translated (0%) | Model validation | Model validation |
| 6315e087d063-d49f-4fc1-aaec-29182da54222 | Not Translated (0%) | The techniques of fuzzy logic and partial mapping are used to overcome the problem of: | The techniques of fuzzy logic and partial mapping are used to overcome the problem of: |
| 6316370c063b-86d6-4dff-a71e-e21472df568d | Not Translated (0%) | flawed records and databases. | flawed records and databases. |
| 6317a1105e4d-7df8-488d-8c32-d59c222cdb5b | Not Translated (0%) | excessive false positives. | excessive false positives. |
| 6318800fca36-623a-4ed6-8a39-d0abd35ab537 | Not Translated (0%) | outdated risk models. | outdated risk models. |
| 6319a5af5cb7-f081-4992-b8b3-0e8d9f656279 | Not Translated (0%) | uncalibrated thresholds. | uncalibrated thresholds. |
| 6320f71bf185-6377-40af-8a89-b6e62f6a0443 | Not Translated (0%) | Which of the following statements describes threshold calibration in the context of AST software used for sanctions compliance? | Which of the following statements describes threshold calibration in the context of AST software used for sanctions compliance? |
| 632121276b2e-42fe-4678-a6d0-c020d4761918 | Not Translated (0%) | Threshold calibration fine-tunes the percentage threshold for determining which alerts to generate. | Threshold calibration fine-tunes the percentage threshold for determining which alerts to generate. |
| 632206413ce2-cbfa-49e9-9628-75b03b95b459 | Not Translated (0%) | Threshold calibration increases the risk of a target being missed or not detected by an AST. | Threshold calibration increases the risk of a target being missed or not detected by an AST. |
| 632320c31e47-5c68-473c-afbf-6ac148b6d10c | Not Translated (0%) | Threshold calibration is independent of the firm’s sanctions risk areas. | Threshold calibration is independent of the firm’s sanctions risk areas. |
| 632423234e8d-dca8-4c23-8e6c-3bfd0a93fd96 | Not Translated (0%) | Threshold calibration fine-tunes which algorithms to use within the AST software. | Threshold calibration fine-tunes which algorithms to use within the AST software. |
| 6325fffd49dd-eff0-4b84-8ca4-f2790b7eb104 | Not Translated (0%) | Scenarios are used in sanctions screening to: | Scenarios are used in sanctions screening to: |
| 6326346be35b-caba-4a8c-b97e-98a05c411eb7 | Not Translated (0%) | analyze payment messages that include multiple unrelated customers with the same physical address. | analyze payment messages that include multiple unrelated customers with the same physical address. |
| 632794af3890-1e12-46b9-920e-16d40511fd79 | Not Translated (0%) | use known typologies to enhance an AST’s ability to detect possible sanctions violations specific to an organization. | use known typologies to enhance an AST’s ability to detect possible sanctions violations specific to an organization. |
| 632888bbc890-73ed-4f6d-8a33-e8202c8bbe31 | Not Translated (0%) | evaluate an organization’s sanctions risk-assessment results. | evaluate an organization’s sanctions risk-assessment results. |
| 63296f197066-2473-40af-9bf3-0a272541a320 | Not Translated (0%) | instruct employees on how to identify known sanctions typologies. | instruct employees on how to identify known sanctions typologies. |
| 63307da8483e-ea56-4afc-bf88-2a1a11076be0 | Not Translated (0%) | There are many sanctions lists, so it is important for a financial institution to: | There are many sanctions lists, so it is important for a financial institution to: |
| 6331d5c75b6f-e394-4f32-8e00-c9b8f442952f | Not Translated (0%) | subscribe only to the UN and EU lists. | subscribe only to the UN and EU lists. |
| 6332d5da733d-5804-41d3-ba5c-a4b63f64ac66 | Not Translated (0%) | cross-check several lists to reduce the number of false positive hits. | cross-check several lists to reduce the number of false positive hits. |
| 6333262ca3cb-88be-4421-9ddc-e007742fe2c6 | Not Translated (0%) | update its KYC information to match the most current lists. | update its KYC information to match the most current lists. |
| 63344789cdec-cb2f-488e-8b29-7fd9422f413a | Not Translated (0%) | identify which lists relate to its customers and the jurisdiction/geography of its business. | identify which lists relate to its customers and the jurisdiction/geography of its business. |
| 6335ab781e1f-35bc-4af3-9491-f0eb1a9300d9 | Not Translated (0%) | Which of the following would constitute a screening software or filtering deficiency that weakens a firm’s compliance program? | Which of the following would constitute a screening software or filtering deficiency that weakens a firm’s compliance program? |
| 6336b6cf0d29-41fe-4975-9087-e07101358ebf | Not Translated (0%) | An organization updates its sanctions screening software to incorporate changes to the SDN list. | An organization updates its sanctions screening software to incorporate changes to the SDN list. |
| 6337b444a9ba-be39-4055-a658-44630cc2d540 | Not Translated (0%) | The organization fails to include pertinent identifiers in the SSI list for designated, blocked, or sanctioned financial institutions. | The organization fails to include pertinent identifiers in the SSI list for designated, blocked, or sanctioned financial institutions. |
| 63383b1e2d19-2e74-4169-b782-dae03bece90c | Not Translated (0%) | Software uses “AKA” or “alias” to account for alternative spellings of surnames. | Software uses “AKA” or “alias” to account for alternative spellings of surnames. |
| 6339fd02823b-2c72-404c-9b79-d449ec57104f | Not Translated (0%) | An institution blocks the activity of a target match from a list outside the host country. | An institution blocks the activity of a target match from a list outside the host country. |
| 6340b2b4bf7c-b49a-40c9-839e-db145f9ddd8f | Not Translated (0%) | Which of the following is a common identifier of a legal entity? | Which of the following is a common identifier of a legal entity? |
| 6341b7ee703a-94a0-4313-a90a-f33b7b0601f5 | Not Translated (0%) | Information about other penalties imposed against a target | Information about other penalties imposed against a target |
| 6342ec1d1d38-c639-4426-902e-bfa4aeddcd6f | Not Translated (0%) | Nationality of a target | Nationality of a target |
| 6343bae8944f-1f37-4a27-8461-9f4b99d15e60 | Not Translated (0%) | Registered or any known operating address of a target | Registered or any known operating address of a target |
| 63446abf2beb-9c2d-49bf-90d6-74a23839841d | Not Translated (0%) | Number of employees | Number of employees |
| 6345f4b4f348-bcc9-4786-abfd-a5320214620c | Not Translated (0%) | Which of the following is an acceptable strategy used by financial institutions to manage the volume of hits and alerts generated by their ASTs? | Which of the following is an acceptable strategy used by financial institutions to manage the volume of hits and alerts generated by their ASTs? |
| 6346942e1030-f494-41eb-bc58-5a21b5dcbe99 | Not Translated (0%) | Reduce the number of lists that the institution screens against. | Reduce the number of lists that the institution screens against. |
| 6347e8982584-2825-41b4-a41b-d9ec12711afe | Not Translated (0%) | Calibrate the threshold used by the AST for matches so that it only generates alerts that are very similar to the information on a sanctions list. | Calibrate the threshold used by the AST for matches so that it only generates alerts that are very similar to the information on a sanctions list. |
| 6348c15c0a94-2ac1-4698-b342-42af6b03d91c | Not Translated (0%) | Recalculate the firm’s risk appetite to take available resources into consideration. | Recalculate the firm’s risk appetite to take available resources into consideration. |
| 6349dbd95282-baf2-4369-9946-501882e7d2fa | Not Translated (0%) | Use whitelists and create more specific scenarios and rules. | Use whitelists and create more specific scenarios and rules. |
| 63506d2bfe4a-cc9b-4add-b47b-660c86387433 | Not Translated (0%) | In sanctions payment screening, the Society for the Worldwide Interbank Financial Telecommunications (SWIFT) code is: | In sanctions payment screening, the Society for the Worldwide Interbank Financial Telecommunications (SWIFT) code is: |
| 63512e296acb-0bae-4e52-a601-c59337f53212 | Not Translated (0%) | a reliable provider of financial messaging services. | a reliable provider of financial messaging services. |
| 63528bb010bf-5f3c-4c2b-b5e0-a1b425f27103 | Not Translated (0%) | a payment system that is neutral with respect to autonomous sanctions. | a payment system that is neutral with respect to autonomous sanctions. |
| 63531bd4d8f1-bed5-479e-a715-f1a10c49851e | Not Translated (0%) | a source of data protocols used by all payment ecosystems. | a source of data protocols used by all payment ecosystems. |
| 6354aea30742-27f6-487d-8f18-253e8892c08a | Not Translated (0%) | a gatekeeper for payment screening tools. | a gatekeeper for payment screening tools. |
| 63554affb22b-2091-4022-bf30-49ce7efa4e8c | Not Translated (0%) | How are SWIFT payment messages predefined? | How are SWIFT payment messages predefined? |
| 635668c6ac0e-af81-4098-bf5c-0b2d27fdbb60 | Not Translated (0%) | By transaction number and type of message | By transaction number and type of message |
| 6357912744c1-1d5d-458f-82d8-899ad5323502 | Not Translated (0%) | By format for type of commercial activity and numbered, set fields | By format for type of commercial activity and numbered, set fields |
| 6358a30542f9-20b7-42ad-84b6-d79a663db6ac | Not Translated (0%) | By commercial activity and value of transaction | By commercial activity and value of transaction |
| 635901546594-28cb-4cc5-b6ee-a19aeafafa24 | Not Translated (0%) | By country code and payment currency | By country code and payment currency |
| 6360a128ac67-8f05-484f-a139-cd41f5d0f84b | Not Translated (0%) | Which of the following describes a strategy to help overcome the challenges posed by naming conventions, transliteration, and romanization? | Which of the following describes a strategy to help overcome the challenges posed by naming conventions, transliteration, and romanization? |
| 636133af9160-fd6e-4356-86da-502b2701e30c | Not Translated (0%) | Screening algorithms should be updated regularly to include new names. | Screening algorithms should be updated regularly to include new names. |
| 6362bcc8a51d-3320-4929-a651-ff56329f20d9 | Not Translated (0%) | Organizations should stop every payment for manual screening and not rely on ASTs for countries that are high risk or for which it does not have an institutional understanding of the types of customers. | Organizations should stop every payment for manual screening and not rely on ASTs for countries that are high risk or for which it does not have an institutional understanding of the types of customers. |
| 6363cc97e3ab-8dd0-4f39-a154-1ae20f4345bb | Not Translated (0%) | Screening analysts should receive name matching training on the cultural naming conventions of global names. | Screening analysts should receive name matching training on the cultural naming conventions of global names. |
| 6364cbfeff9d-6c1a-4cf4-b07d-c62d23dd6095 | Not Translated (0%) | Analysts should build their own equivalence and synonyms lists. | Analysts should build their own equivalence and synonyms lists. |
| 6365078ededb-25ee-43a4-b3ad-3e8a95d6b421 | Not Translated (0%) | Which of the following is an identifier on the Denied Persons List of individuals and entities whose export privileges have been denied by the BIS? | Which of the following is an identifier on the Denied Persons List of individuals and entities whose export privileges have been denied by the BIS? |
| 63664f23f14b-352c-48c6-b727-0e3d57c58c64 | Not Translated (0%) | Shipping routes | Shipping routes |
| 63670d9505bc-c37b-4635-9cdf-7ce5f6940009 | Not Translated (0%) | Ports of call | Ports of call |
| 6368d26d8f1a-abc8-43d6-85d1-8b4f7d16dd27 | Not Translated (0%) | Recent voyage history | Recent voyage history |
| 6369ad2386c8-07c8-44c5-86f0-f6bc06d41f8f | Not Translated (0%) | Types of goods | Types of goods |
| 637087089c38-b286-4ad4-88e5-b96eedb96590 | Not Translated (0%) | One of the challenges of trade-related screening related to documentation is: | One of the challenges of trade-related screening related to documentation is: |
| 6371773a4c2d-b970-455b-a073-27d805fe9a12 | Not Translated (0%) | it can be provided after the importing or exporting has occurred. | it can be provided after the importing or exporting has occurred. |
| 63725b629e0a-3050-477d-b46a-06a681c0cef4 | Not Translated (0%) | it can be provided in formats that require manual review. | it can be provided in formats that require manual review. |
| 63737fbd7de3-0147-4c7b-abd1-dd885a3f38a7 | Not Translated (0%) | it does not include details such as the quantity and weight of the goods. | it does not include details such as the quantity and weight of the goods. |
| 637429f0badb-a9eb-48ab-887f-a9dba3100062 | Not Translated (0%) | it does not account for dual-use goods. | it does not account for dual-use goods. |
| 63758a9f1a96-6e6b-46c4-ac78-20dcd89fd3ea | Not Translated (0%) | You are onboarding a customer from a low-risk jurisdiction whom you have been told does extensive business in the former Soviet Union. | You are onboarding a customer from a low-risk jurisdiction whom you have been told does extensive business in the former Soviet Union. |
| 63768a9f1a96-6e6b-46c4-ac78-20dcd89fd3ea | Not Translated (0%) | You screen the customer against the sanctions lists and do not find the customer to be listed by OFAC or any other sanctions regimes. | You screen the customer against the sanctions lists and do not find the customer to be listed by OFAC or any other sanctions regimes. |
| 63778a9f1a96-6e6b-46c4-ac78-20dcd89fd3ea | Not Translated (0%) | Which of the following would be the most appropriate action to take? | Which of the following would be the most appropriate action to take? |
| 6378e28cb953-4278-435f-b009-c90788ce2a54 | Not Translated (0%) | Do nothing, as the customer is located in a low-risk jurisdiction, and you can rely on that jurisdiction to enforce sanctions restrictions on customers. | Do nothing, as the customer is located in a low-risk jurisdiction, and you can rely on that jurisdiction to enforce sanctions restrictions on customers. |
| 637933ccdade-bec2-457c-942e-30b04d67a089 | Not Translated (0%) | Ask the customer to provide the names of those entities that it expects to transact with, and screen those entities for sanctions. | Ask the customer to provide the names of those entities that it expects to transact with, and screen those entities for sanctions. |
| 63806d9cfdad-42ba-4ba3-9de6-39c7e11d7965 | Not Translated (0%) | Place a hold on the account and screen all the named entities prior to processing any transactions. | Place a hold on the account and screen all the named entities prior to processing any transactions. |
| 638159f23152-8f0c-4004-862a-62a2ead26322 | Not Translated (0%) | Ask the customer to provide its beneficial ownership for further screening. | Ask the customer to provide its beneficial ownership for further screening. |
| 638225f5b9aa-45f8-4154-9a9d-432f6fec8f1a | Not Translated (0%) | Instructor | Instructor |
| 63838e8d3686-e48d-4782-b540-e36537bcff36 | Not Translated (0%) | Student | Student |
| 638461c74684-1f74-440a-acce-da301b27a674 | Not Translated (0%) | <16570>Module</16570> Review: | <16570>Module</16570> Review: |
| 638561c74684-1f74-440a-acce-da301b27a674 | Not Translated (0%) | Sanctions Investigations and Assets Freezing | Sanctions Investigations and Assets Freezing |
| 638691f4daa2-1a75-49da-a863-7170132b589c | Not Translated (0%) | Which scenario commonly triggers a sanctions investigation? | Which scenario commonly triggers a sanctions investigation? |
| 638766359242-9a1e-4ea2-a1b2-ddffc437c19e | Not Translated (0%) | The customer provides incomplete documentation when opening an account. | The customer provides incomplete documentation when opening an account. |
| 6388caf3f2c7-339d-4253-95e0-fe2cbd1b7344 | Not Translated (0%) | The customer indicates a new country of residence. | The customer indicates a new country of residence. |
| 6389654f45df-b871-4d07-b524-5fe7b8bef1c8 | Not Translated (0%) | Your screening tool discovers a possible name match between the customer and a sanctions target. | Your screening tool discovers a possible name match between the customer and a sanctions target. |
| 639041fc9abe-80a0-4164-b10e-75965568e433 | Not Translated (0%) | Your screening tool discovers another customer with the same address. | Your screening tool discovers another customer with the same address. |
| 63911930ea21-33ac-4bcf-9aa0-844336a4a894 | Not Translated (0%) | Which of the following may preclude further investigation? | Which of the following may preclude further investigation? |
| 6392d87c6f21-e375-4879-9348-d0dd41cd4667 | Not Translated (0%) | Informing the customer | Informing the customer |
| 63935c190f19-045c-439f-b50e-6695566de27a | Not Translated (0%) | Simple checks to discount the match | Simple checks to discount the match |
| 639438d27882-9470-425e-ba2f-1c88f2f95edc | Not Translated (0%) | Blocking assets | Blocking assets |
| 639514f811f5-b7dd-4b66-841d-1f9af8c10d20 | Not Translated (0%) | Filing a suspicious transaction report with local authorities | Filing a suspicious transaction report with local authorities |
| 639634f990c8-52ad-4b17-87c3-c9947f729a17 | Not Translated (0%) | Which of the following is a key identifier for an individual? | Which of the following is a key identifier for an individual? |
| 639767f8c606-99ca-4162-9cb6-e2e4e4b4539d | Not Translated (0%) | Date of birth | Date of birth |
| 6398ff6d134f-7972-4e14-b6dc-6a45e328692e | Not Translated (0%) | Weight | Weight |
| 639952a0b5fb-a9f2-46e4-83fa-c5e0777327b1 | Not Translated (0%) | Marital status | Marital status |
| 64004735c443-9407-41c9-a500-f7dc20c4e59a | Not Translated (0%) | Religious affiliation | Religious affiliation |
| 6401f0b9c261-023e-454c-8276-0e53951c8e69 | Not Translated (0%) | Which of the following is a key identifier for a legal entity? | Which of the following is a key identifier for a legal entity? |
| 6402fa8d6bc0-7000-471d-80de-10babbe37b09 | Not Translated (0%) | The legal entity’s profit/loss statement | The legal entity’s profit/loss statement |
| 6403e7c0809d-c3ad-491c-83ef-e26d61f1674a | Not Translated (0%) | The legal entity’s number of units sold per fiscal year | The legal entity’s number of units sold per fiscal year |
| 6404d4d42cd9-5571-4dd3-83aa-933c5c8a410c | Not Translated (0%) | The legal entity’s registered or corporate name and registration number | The legal entity’s registered or corporate name and registration number |
| 64051ec86d8a-9284-4d65-b247-d01a8cac45ca | Not Translated (0%) | The legal entity’s number of employees | The legal entity’s number of employees |
| 640610ac1333-e854-42b8-b950-1e200d342395 | Not Translated (0%) | In assessing the appropriate response to sanctions alerts, investigators commonly use which of the following tools? | In assessing the appropriate response to sanctions alerts, investigators commonly use which of the following tools? |
| 6407532209c5-6ab7-47b5-9ae0-df48ad8940b8 | Not Translated (0%) | Computer-generated algorithm | Computer-generated algorithm |
| 640890883907-2a03-439d-af8f-deca1d2fea68 | Not Translated (0%) | Three-step test of customer reliability | Three-step test of customer reliability |
| 6409b2359fda-0567-40c9-a36e-0ebc8f2208d6 | Not Translated (0%) | Five-step decision tree | Five-step decision tree |
| 6410658a8fca-19a3-481d-8e5e-ed934825f7dd | Not Translated (0%) | Social-media monitoring software | Social-media monitoring software |
| 6411a6fa12b9-ec31-45e7-aca9-15efc2870cd7 | Not Translated (0%) | Which action is part of an appropriate response to sanctions alerts? | Which action is part of an appropriate response to sanctions alerts? |
| 64123652487a-31ce-4fce-bad7-9c1b45480101 | Not Translated (0%) | Completing a SAR/STR within 10 business days | Completing a SAR/STR within 10 business days |
| 64137f981095-fd63-449a-960d-1d8d14445745 | Not Translated (0%) | Informing customer of alert and requesting clarification | Informing customer of alert and requesting clarification |
| 641463330bd8-e3d9-4667-ad85-2471dcf96a4f | Not Translated (0%) | Blocking or rejecting sanctions alerts | Blocking or rejecting sanctions alerts |
| 64154c57a36d-19a6-4b15-8145-236bc3becf9f | Not Translated (0%) | Determining the types of sanctions that are applicable to the activity | Determining the types of sanctions that are applicable to the activity |
| 6416019dbc27-ce67-4407-9b82-ac18e5139799 | Not Translated (0%) | When is it important to record and document the findings of an investigation? | When is it important to record and document the findings of an investigation? |
| 64174e547d65-3ce4-4797-9717-37aed3659ddc | Not Translated (0%) | Only when the investigation disproves the sanctions violation. | Only when the investigation disproves the sanctions violation. |
| 6418762cbe49-349d-4289-9a7e-68ed8a4f79eb | Not Translated (0%) | Only when the investigation confirms the sanctions violation. | Only when the investigation confirms the sanctions violation. |
| 64199db54509-cf66-408f-aa5b-e6f8a1db6df1 | Not Translated (0%) | Only when the investigation cannot prove or disprove the sanctions violation. | Only when the investigation cannot prove or disprove the sanctions violation. |
| 64208059d092-fba0-46ac-a553-0179cba89f17 | Not Translated (0%) | Always; every step of every investigation must be recorded and documented. | Always; every step of every investigation must be recorded and documented. |
| 6421b0fba1ac-5dfb-45df-a4b6-31e759c0bc13 | Not Translated (0%) | Which statement is true of sanctions lists? | Which statement is true of sanctions lists? |
| 64220b91d79a-ca58-407d-9a71-dfbe3e2be7cb | Not Translated (0%) | Sanctions lists are only updated annually. | Sanctions lists are only updated annually. |
| 6423070b1122-86b2-4610-b69b-93ba0ae56021 | Not Translated (0%) | Sanctions lists are issued by the United Nations Council on Sanctions Compliance (UNCSC). | Sanctions lists are issued by the United Nations Council on Sanctions Compliance (UNCSC). |
| 64246b546822-6691-4e3b-8315-75517f45c08e | Not Translated (0%) | More than one sanctions list might pertain to one individual or legal entity. | More than one sanctions list might pertain to one individual or legal entity. |
| 64257dea88fa-96b9-42c4-b17b-a70b449e642e | Not Translated (0%) | Screening against OFAC-maintained lists ensures compliance with other countries’ lists. | Screening against OFAC-maintained lists ensures compliance with other countries’ lists. |
| 642611ddc414-890a-486d-bdf8-d199cff8af89 | Not Translated (0%) | The term “asset flight” refers to: | The term “asset flight” refers to: |
| 64270527c36e-e080-4034-a0cb-b88f2f500c01 | Not Translated (0%) | the movement of assets from inside a soon-to-be-sanctioned area to outside the area, to ensure the assets’ future availability. | the movement of assets from inside a soon-to-be-sanctioned area to outside the area, to ensure the assets’ future availability. |
| 642838cbc2ad-738f-413f-8d07-18279336710b | Not Translated (0%) | the limitations on the amount of currency that can be transferred out of a country in any single transaction. | the limitations on the amount of currency that can be transferred out of a country in any single transaction. |
| 6429b958f1f1-c431-4202-8c6d-8c7705e74851 | Not Translated (0%) | the banning of aviation related to the import/export of dual-use goods. | the banning of aviation related to the import/export of dual-use goods. |
| 6430160667f2-648c-4119-9c76-e311644842ca | Not Translated (0%) | the applicability of sanctions within a jurisdiction’s air space. | the applicability of sanctions within a jurisdiction’s air space. |
| 643117a1f5a9-207f-4988-bf01-c104ff08b4dd | Not Translated (0%) | Which item is a primary sources of information that can be used in an investigation? | Which item is a primary sources of information that can be used in an investigation? |
| 6432a08bc6e5-4982-4cc4-b0ce-e10dec023f79 | Not Translated (0%) | Key trade activity lists | Key trade activity lists |
| 6433dfb4af48-4dd8-4c74-a2b8-134b177f1163 | Not Translated (0%) | Search engines (Google, etc.) | Search engines (Google, etc.) |
| 64348f7b9afa-ef22-47ef-8ebb-c7dbf179f5d8 | Not Translated (0%) | Corporate registers | Corporate registers |
| 64352acf7d3f-2153-4a4f-ac08-08eb19ef9564 | Not Translated (0%) | Third-party databases | Third-party databases |
| 643676a117ae-2870-41e9-8fcf-7511a2400862 | Not Translated (0%) | How do customers typically learn that their assets have been frozen because of a sanctions violation? | How do customers typically learn that their assets have been frozen because of a sanctions violation? |
| 64373c2a9c69-a44e-4d4c-9e98-04955d7ae392 | Not Translated (0%) | The financial institution intending to freeze assets must provide written notification at least 10 business days in advance of taking such action. | The financial institution intending to freeze assets must provide written notification at least 10 business days in advance of taking such action. |
| 6438f184c44e-ed30-418b-8eb2-756528254213 | Not Translated (0%) | Customers are alerted that an investigation is underway, and can “opt in” to receive alerts about future impending actions. | Customers are alerted that an investigation is underway, and can “opt in” to receive alerts about future impending actions. |
| 6439fcd0ab46-e131-43d2-b96f-5049dbedd1b6 | Not Translated (0%) | Customers may receive no notice and generally discover that their assets have been frozen when they are unable to access their funds. | Customers may receive no notice and generally discover that their assets have been frozen when they are unable to access their funds. |
| 6440c2099a72-b389-4050-ac1b-078491b3c0ee | Not Translated (0%) | The lead (or co-lead) investigator must notify the customer by telephone no more than 24 hours in advance of taking such action. | The lead (or co-lead) investigator must notify the customer by telephone no more than 24 hours in advance of taking such action. |
| 6441294bb682-10f0-4c6a-bd28-d62e8efefd48 | Not Translated (0%) | Which of the following statements is true of frozen assets in the European Union? | Which of the following statements is true of frozen assets in the European Union? |
| 644230e446b4-502a-4c91-bb58-8d48974703ed | Not Translated (0%) | Frozen assets cannot be used for any purpose. | Frozen assets cannot be used for any purpose. |
| 644301607ee3-add2-4068-b0af-b48d2f119ddb | Not Translated (0%) | Frozen assets can be used to pay for certain basic needs, such as food, rent, and legal support, provided the necessary document (license) has been obtained. | Frozen assets can be used to pay for certain basic needs, such as food, rent, and legal support, provided the necessary document (license) has been obtained. |
| 64446b5a7eff-db7f-48a5-a0cf-3c5938ac48ab | Not Translated (0%) | Fees (such as monthly service charges on an account) usually cannot be charged on frozen assets. | Fees (such as monthly service charges on an account) usually cannot be charged on frozen assets. |
| 6445e3696d25-21e6-4427-b467-c25115998e15 | Not Translated (0%) | Frozen assets cannot accrue interest. | Frozen assets cannot accrue interest. |
| 64464babc372-7ca5-4cea-9102-dcd7ba7f6cb8 | Not Translated (0%) | Which of the following statements is true about general licenses? | Which of the following statements is true about general licenses? |
| 6447d34e545a-7ade-49f3-b28a-ba0e78fb9a9a | Not Translated (0%) | General licenses can be difficult to find, because they are rarely posted on the sanctions regulator’s website. | General licenses can be difficult to find, because they are rarely posted on the sanctions regulator’s website. |
| 6448ed76c52b-ce5f-4538-a68e-18502e9bfa37 | Not Translated (0%) | General licenses authorize a particular type of transaction for a class of persons without the need to apply for a specific license. | General licenses authorize a particular type of transaction for a class of persons without the need to apply for a specific license. |
| 64490510c2ac-5880-4249-a8b2-06d5f3a8b978 | Not Translated (0%) | General licenses are issued on a case-by-case basis. | General licenses are issued on a case-by-case basis. |
| 645018030f25-20bd-4d8d-b0f2-2822292c479f | Not Translated (0%) | General licenses are rarely issued, as they provide too much opportunity for circumventing economic sanctions restrictions. | General licenses are rarely issued, as they provide too much opportunity for circumventing economic sanctions restrictions. |
| 6451b5c8433a-8881-4016-8bab-53b8d72a7455 | Not Translated (0%) | Which statement is true of specific licenses? | Which statement is true of specific licenses? |
| 6452aa4372f1-800a-4c03-98b0-10da568f60a5 | Not Translated (0%) | Specific licenses must be applied for from the competent regulatory body in the jurisdiction issuing the sanction. | Specific licenses must be applied for from the competent regulatory body in the jurisdiction issuing the sanction. |
| 6453f71b044b-0369-4c35-ba1f-68b90cc777d6 | Not Translated (0%) | Specific licenses must be applied for by the end user seeking them. | Specific licenses must be applied for by the end user seeking them. |
| 6454b16ce1f1-7fb3-4261-bbb0-a29987a6e4b2 | Not Translated (0%) | Specific licenses are only granted for a limited time period (not to exceed 60 days). | Specific licenses are only granted for a limited time period (not to exceed 60 days). |
| 64554c916c29-a264-4250-8ae9-4b9992b210ee | Not Translated (0%) | Specific licenses do not need to be applied for in more than one jurisdiction. | Specific licenses do not need to be applied for in more than one jurisdiction. |
| 6456d7732ffc-7536-4fd0-9358-0a227641054b | Not Translated (0%) | Which item describes a way to be delisted (removed from a sanctions targets list)? | Which item describes a way to be delisted (removed from a sanctions targets list)? |
| 6457bb575138-265e-4dce-ad95-f7f3ecea00f5 | Not Translated (0%) | By submitting at least five professional references to the blocking agent | By submitting at least five professional references to the blocking agent |
| 6458099cf9e0-ef2c-4bbd-bebb-2d6b9457d170 | Not Translated (0%) | By filing for personal or corporate bankruptcy | By filing for personal or corporate bankruptcy |
| 64599af99e8d-2027-4a32-abd6-5374a08cb1b4 | Not Translated (0%) | By direct request from the target to the authority imposing the restrictions | By direct request from the target to the authority imposing the restrictions |
| 6460426af451-3466-4f29-b9f8-8b5669701df6 | Not Translated (0%) | By lodging a formal complaint with the financial institution imposing the block | By lodging a formal complaint with the financial institution imposing the block |
| 6461216781a1-7b44-4184-9c9d-6b312deb3abc | Not Translated (0%) | “Dealing in funds” refers to: | “Dealing in funds” refers to: |
| 6462f57b5bdb-7c62-48a5-a523-7c47079ee945 | Not Translated (0%) | interacting with frozen assets in a way that is inconsistent with sanctions law. | interacting with frozen assets in a way that is inconsistent with sanctions law. |
| 646375e1d765-3cc3-40fd-89b8-de509fcd8c92 | Not Translated (0%) | creating money-market funds specifically for the purpose of segregating frozen assets. | creating money-market funds specifically for the purpose of segregating frozen assets. |
| 6464781139bb-9df6-461b-a86e-56ac9ea250dd | Not Translated (0%) | transferring funds from one branch of a financial institution to a different, less profitable branch. | transferring funds from one branch of a financial institution to a different, less profitable branch. |
| 646543bac057-9aa9-4c91-b06b-fcae6024acb5 | Not Translated (0%) | failing to manage “asset drift” between frozen accounts in two different jurisdictions. | failing to manage “asset drift” between frozen accounts in two different jurisdictions. |
| 646687ef70b2-de42-4f1c-964e-6e4ccaf273ab | Not Translated (0%) | When sanctions regulations explain exactly what actions are permitted without a license, which actions are allowed only with a license, and under what circumstances certain actions are either allowed or not allowed, which of the following are they detailing? | When sanctions regulations explain exactly what actions are permitted without a license, which actions are allowed only with a license, and under what circumstances certain actions are either allowed or not allowed, which of the following are they detailing? |
| 646781ccb4d5-ec5d-4d27-9b3a-598bdcd43bc9 | Not Translated (0%) | The sanction’s scope of licensing | The sanction’s scope of licensing |
| 64685bbdce73-0035-47d2-a83e-afbab5582e82 | Not Translated (0%) | The sanction’s scope of jurisdiction | The sanction’s scope of jurisdiction |
| 64694675a479-9857-4bab-bbd0-bfb6eca115e8 | Not Translated (0%) | The sanction’s scope of influence | The sanction’s scope of influence |
| 6470e7d467c6-e9fd-4946-b1fe-f1e28bfd8ee3 | Not Translated (0%) | The sanction’s scope of permitted activities | The sanction’s scope of permitted activities |
| 647150d1424e-6a5b-4ffc-9ef0-6bbb56e23840 | Not Translated (0%) | If you identify funds belonging to a sanctions target or realize your firm has violated a sanctions restriction, what action should you take? | If you identify funds belonging to a sanctions target or realize your firm has violated a sanctions restriction, what action should you take? |
| 64725bcaaffa-26c9-4c31-a707-d35980cc771e | Not Translated (0%) | Informally conduct an investigation to ensure discretion. | Informally conduct an investigation to ensure discretion. |
| 647345435ec4-e860-47ac-9b37-f62aed7cddba | Not Translated (0%) | Report current or past violations by telephone within 30 days of discovery. | Report current or past violations by telephone within 30 days of discovery. |
| 6474bc4c6304-a501-4c71-8901-49d4b736e053 | Not Translated (0%) | Record, date, and keep copies of all steps taken in the investigation. | Record, date, and keep copies of all steps taken in the investigation. |
| 64751befbb3d-5775-4dca-a609-258a0977b4b0 | Not Translated (0%) | Avoid voluntarily reporting current or past violations until required to do so. | Avoid voluntarily reporting current or past violations until required to do so. |
| 6476e645695c-2555-45d5-ba83-e618ebddc4d9 | Not Translated (0%) | What is the legal term that refers to the country in which an individual lives most of the time? | What is the legal term that refers to the country in which an individual lives most of the time? |
| 6477b8e8a68d-503e-40a4-b030-4552f03e7a39 | Not Translated (0%) | The individual’s native country | The individual’s native country |
| 6478f85b2b0c-a3c3-4a97-827a-b44ec4dc1512 | Not Translated (0%) | The individual’s jurisdiction of residence | The individual’s jurisdiction of residence |
| 6479945e546f-7376-47c2-96be-29ceabdfd20c | Not Translated (0%) | The individual’s home identifier | The individual’s home identifier |
| 64808de65576-3e6c-4cb6-a730-5e8ca3996a17 | Not Translated (0%) | The individual’s jurisdiction of citizenship | The individual’s jurisdiction of citizenship |
| 64813abc71f1-a81e-4207-83c2-2f7cd686e9f5 | Not Translated (0%) | What is the term for the process of reviewing a customer’s past transaction activity over a specific time period? | What is the term for the process of reviewing a customer’s past transaction activity over a specific time period? |
| 64823e486a0e-3822-4120-877d-c4891ae20da5 | Not Translated (0%) | Year-to-date review | Year-to-date review |
| 6483b98f6f75-7d1f-4b4e-874b-de755912891f | Not Translated (0%) | Life-of-account review | Life-of-account review |
| 6484fee28b6a-f86b-4cf8-a483-7ebc7b9d6a93 | Not Translated (0%) | Customer due diligence (CDD) | Customer due diligence (CDD) |
| 6485292ebec9-b19b-46e3-a4a4-42ef73d3af88 | Not Translated (0%) | Look-back review | Look-back review |
| 6486ab50699a-8166-4f24-a21e-2a7830f037d3 | Not Translated (0%) | Within the context of sanctions, the practice known as “mirror trading” refers to investors doing which of the following? | Within the context of sanctions, the practice known as “mirror trading” refers to investors doing which of the following? |
| 648763c2c8d7-30d8-479f-8ec3-8072c5d2940f | Not Translated (0%) | Increasing their capital gains significantly by “mirroring” successful investors’ trading activity | Increasing their capital gains significantly by “mirroring” successful investors’ trading activity |
| 64884490c9fb-8ab7-43e8-be51-552edb9489a0 | Not Translated (0%) | Trading funds on the black market in order to avoid fees and taxes | Trading funds on the black market in order to avoid fees and taxes |
| 648923f556c6-9dd2-48bd-a762-2486865cb6b1 | Not Translated (0%) | Buying securities in one currency and then selling identical ones in another currency | Buying securities in one currency and then selling identical ones in another currency |
| 6490135fb217-8002-407e-95bd-4610835166fe | Not Translated (0%) | Investing less desirable currency (such as rubles) in works of fine art and then selling the art for more desirable or stable currencies | Investing less desirable currency (such as rubles) in works of fine art and then selling the art for more desirable or stable currencies |
| 649105e43c60-e073-479e-a5e0-8758fefe103d | Not Translated (0%) | What is a corporate register? | What is a corporate register? |
| 6492c0348a47-dee8-4740-9b57-8fc37452010a | Not Translated (0%) | A list, created and maintained by the firm’s chief financial officer, of all assets held by a financial institution | A list, created and maintained by the firm’s chief financial officer, of all assets held by a financial institution |
| 64937449ca39-0739-41c1-8c0c-9054715fa0dd | Not Translated (0%) | A list of key information about a company, such as when it was formed and who its owners and directors are | A list of key information about a company, such as when it was formed and who its owners and directors are |
| 649491774238-48c7-4123-8579-8e91e3fde8c1 | Not Translated (0%) | A list, created and maintained by the Business Council for the United Nations, of all companies doing business in the international markets | A list, created and maintained by the Business Council for the United Nations, of all companies doing business in the international markets |
| 6495bb18ab8a-ce4f-4559-bdd9-ecd188381ac8 | Not Translated (0%) | A list of key information about a firm’s customers or clients, such as their dates of birth and permanent residences | A list of key information about a firm’s customers or clients, such as their dates of birth and permanent residences |
| 6496b885ed5c-e81c-427a-8b71-4f0d7f1c75ef | Not Translated (0%) | What does the term “simple check” refer to? | What does the term “simple check” refer to? |
| 649798f5781d-fe88-4b09-a530-1e6e205e7c74 | Not Translated (0%) | The initial actions taken to discount or confirm a sanctions link | The initial actions taken to discount or confirm a sanctions link |
| 649862e7b098-50b4-421e-9891-6eef6fcfb8d4 | Not Translated (0%) | A personal check payable to an individual and signed by an individual | A personal check payable to an individual and signed by an individual |
| 6499c86637d8-0a61-471d-bfee-ecca7bec7fe9 | Not Translated (0%) | A business check payable to another business within the same jurisdiction | A business check payable to another business within the same jurisdiction |
| 65001381f821-9595-47d5-b455-21294ebc3bf8 | Not Translated (0%) | The placement of a temporary hold on assets while an initial investigation is conducted | The placement of a temporary hold on assets while an initial investigation is conducted |
| 650166182a81-cda5-4772-872a-9a80a77bc7e9 | Not Translated (0%) | Funds that are blocked or rejected due to an OFAC sanction must be reported to OFAC within which of the following? | Funds that are blocked or rejected due to an OFAC sanction must be reported to OFAC within which of the following? |
| 6502f3837785-05c9-4efc-aac5-91b493a2b56e | Not Translated (0%) | 5 business days from the date of the action | 5 business days from the date of the action |
| 6503013dc74b-1111-4c14-91c7-ccbe013a691a | Not Translated (0%) | 5 calendar days from the date of the action | 5 calendar days from the date of the action |
| 6504cf134b8d-a090-489a-b429-894e66eb4160 | Not Translated (0%) | 10 business days from the date of the action | 10 business days from the date of the action |
| 650585aa7039-95b5-4e7b-a952-237cf2acc231 | Not Translated (0%) | 10 calendar days from the date of the action | 10 calendar days from the date of the action |
| 65061a99b1f8-0206-48e6-87d2-2568f36152cb | Not Translated (0%) | What is a “false positive” match? | What is a “false positive” match? |
| 650764ec6662-7a7b-4c30-abe7-123bdaf3b1de | Not Translated (0%) | A match generated by an automated screening tool (AST) that is based on positive, but intentionally deceptive, information | A match generated by an automated screening tool (AST) that is based on positive, but intentionally deceptive, information |
| 6508cde9942d-c6e4-479b-92d6-420480ee87d1 | Not Translated (0%) | A match generated by an AST that is later deemed not to be a true match | A match generated by an AST that is later deemed not to be a true match |
| 650909103bed-1fc4-41d5-8a6d-c5eea502aaf9 | Not Translated (0%) | A proven match that was not initially flagged by an AST | A proven match that was not initially flagged by an AST |
| 65100a45c155-a01f-4523-8414-5004d0a632bd | Not Translated (0%) | A match generated by an AST that is later confirmed to be a true match | A match generated by an AST that is later confirmed to be a true match |
| 65117c83a989-3bbe-44ba-b6ba-89dfd2d6017b | Not Translated (0%) | When conducting an investigation or interacting with frozen or blocked assets, where should you look first for information on how to proceed? | When conducting an investigation or interacting with frozen or blocked assets, where should you look first for information on how to proceed? |
| 65124a2c72df-cba6-4875-b5ae-8693a02cfcb2 | Not Translated (0%) | Your firm’s internal procedural documents | Your firm’s internal procedural documents |
| 651346c139d1-9bdf-4d8e-878e-a7828d8c33a4 | Not Translated (0%) | The regulator’s office in the jurisdiction in question | The regulator’s office in the jurisdiction in question |
| 65143f049726-ccdc-48b8-b915-1681fffb1a15 | Not Translated (0%) | The Business Council for the United Nations | The Business Council for the United Nations |
| 6515f3badab6-eeca-4dd8-b3f0-e1d2a0bd22a4 | Not Translated (0%) | OFAC | OFAC |
| 6516c218300b-6387-449b-a57a-f9fca39f6e2e | Not Translated (0%) | Instructor | Instructor |
| 6517e8c9d3fd-faf9-472d-ad27-6a02e77402d1 | Not Translated (0%) | Student | Student |
| 6518885b8735-58b4-4b32-98d0-94001a3d9313 | Not Translated (0%) | Course Review: | Course Review: |
| 6519885b8735-58b4-4b32-98d0-94001a3d9313 | Not Translated (0%) | Answers | Answers |
| 65208b66f0c2-3290-4298-a911-199b3337f81d | Not Translated (0%) | Answer Key | Answer Key |
| 65219ba2aaf3-793c-4fb0-9456-5b500ab51eb1 | Not Translated (0%) | 1 | 1 |
| 6522496a24e6-baf0-4c6f-9540-bcf82e18cbee | Not Translated (0%) | A | A |
| 652326ad8b61-c82c-43ac-9096-5b92e16f9713 | Not Translated (0%) | 31 | 31 |
| 6524e042874e-7f1e-4c19-aae3-643bec388a91 | Not Translated (0%) | C | C |
| 65259cb0fae9-88a4-4630-b405-8a52dc77ac2b | Not Translated (0%) | 61 | 61 |
| 652640a64fd4-64ea-480f-86aa-6e68c3177247 | Not Translated (0%) | A | A |
| 6527a78f4eb0-df59-4661-ace9-d2f8ce901b2f | Not Translated (0%) | 91 | 91 |
| 65285d012213-cb0e-4f8d-af52-d8f418f89c34 | Not Translated (0%) | B | B |
| 652906dc76d5-5ee8-46f6-be2d-05f794d83707 | Not Translated (0%) | 2 | 2 |
| 6530a160f603-f04b-432b-8bdb-6de7aa4daab5 | Not Translated (0%) | C | C |
| 653195bcfa61-e6c7-466b-a34f-bdbad400e95b | Not Translated (0%) | 32 | 32 |
| 65320c9f2567-e9e9-4e34-b8f8-ea79c9161950 | Not Translated (0%) | B | B |
| 6533355f0928-91a9-4f58-9641-8e8dce5236a0 | Not Translated (0%) | 62 | 62 |
| 6534239a748d-8dff-48c0-8f2a-c0c56e84cb2b | Not Translated (0%) | C | C |
| 6535b33384de-17af-4e87-980d-109de682cc38 | Not Translated (0%) | 92 | 92 |
| 65367a409eeb-f611-42bf-a76d-4f920c1cd3c3 | Not Translated (0%) | B | B |
| 65372e517491-d6f5-4cfe-8df7-fc4f6f27d8ae | Not Translated (0%) | 3 | 3 |
| 65383ac8b740-8c04-4188-8ddb-e6353bfe56cb | Not Translated (0%) | A | A |
| 6539cf5a9249-91f1-4382-a155-4f83b1eec0a1 | Not Translated (0%) | 33 | 33 |
| 6540fd7b8fb4-de70-4c1a-86be-bb40f965e7a2 | Not Translated (0%) | C | C |
| 65417c2421c8-70fe-4be8-a68a-802da80bf96c | Not Translated (0%) | 63 | 63 |
| 654225591a11-cfc9-4aad-b5a0-84dda4bef661 | Not Translated (0%) | A | A |
| 654346299a89-4bd2-4441-bf2c-411d89832393 | Not Translated (0%) | 93 | 93 |
| 6544302a3565-385b-435c-ab49-1efbfd5fe3cd | Not Translated (0%) | C | C |
| 65457d920367-d98b-4f98-b4a8-0e17ee5e0c3f | Not Translated (0%) | 4 | 4 |
| 6546538adf28-46e7-4b7c-8539-fe72da68dc46 | Not Translated (0%) | B | B |
| 6547ccdac81e-7332-408c-b147-1ebf207dd22d | Not Translated (0%) | 34 | 34 |
| 654880c04c1d-1fc6-4381-80ac-06ab67a2e428 | Not Translated (0%) | A | A |
| 6549ffc27f89-4ba4-4f7a-8981-7245af4f4728 | Not Translated (0%) | 64 | 64 |
| 6550765efa61-232a-41f9-a1a1-5300baea70db | Not Translated (0%) | D | D |
| 65514f95a668-0821-416e-8f20-8a1b80778afc | Not Translated (0%) | 94 | 94 |
| 6552c043b39e-b167-465d-998e-69cefeded248 | Not Translated (0%) | B | B |
| 65530f02ea6c-25cd-457a-89e4-7c74b3a3f632 | Not Translated (0%) | 5 | 5 |
| 6554981df887-247e-41d3-aeaf-c8c5d9c40b4a | Not Translated (0%) | C | C |
| 6555c142e872-ddb5-45bf-a084-d459186f0da4 | Not Translated (0%) | 35 | 35 |
| 655629d2ac00-2e99-4b9f-9acf-2bf7fee7eb95 | Not Translated (0%) | C | C |
| 65575e5c5ea8-4aa9-4a29-b829-1873e1806ff7 | Not Translated (0%) | 65 | 65 |
| 65589e272078-49f5-4864-9b3d-367a2915d8e9 | Not Translated (0%) | C | C |
| 6559fa1986dd-af4d-4551-b115-5acd1d076961 | Not Translated (0%) | 95 | 95 |
| 656050e90cb2-75cc-40e4-bfcd-0505ba27a777 | Not Translated (0%) | A | A |
| 6561efa88b6d-0ad0-4037-a094-04251a516c78 | Not Translated (0%) | 6 | 6 |
| 65627b9f586d-b278-417f-ae1f-6ddaf29044b3 | Not Translated (0%) | D | D |
| 656358c2d60f-03d7-49dd-8f33-a7801d38a907 | Not Translated (0%) | 36 | 36 |
| 65640447d547-dc05-4bc6-a0ef-91d328220ab8 | Not Translated (0%) | A | A |
| 6565c4453eec-737c-49b2-bdcb-5f8105bf1394 | Not Translated (0%) | 66 | 66 |
| 6566697d1bac-a87a-4453-94c5-77055ec779da | Not Translated (0%) | D | D |
| 6567070ddc5e-7e03-40cf-bff9-265ae8d0e7ab | Not Translated (0%) | 96 | 96 |
| 65684ce71f25-0b1e-4e84-8db0-0c3ab18a0384 | Not Translated (0%) | C | C |
| 6569ddd65549-7c76-4ce7-adf4-7945655f0665 | Not Translated (0%) | 7 | 7 |
| 6570cd0a00ac-4b9f-4da3-bb33-dd68fc41fa87 | Not Translated (0%) | B | B |
| 6571eba84774-9a95-4b15-8ef6-7f8797b00310 | Not Translated (0%) | 37 | 37 |
| 657208de80ec-3454-4f23-bec9-5b4c11f9ed99 | Not Translated (0%) | D | D |
| 6573a86314ae-e4ff-4a02-a2cf-e8a35bea99da | Not Translated (0%) | 67 | 67 |
| 657415c875c7-bcc3-4a65-acf8-6be4fe3baed8 | Not Translated (0%) | A | A |
| 6575ff7fa841-d604-40a7-bd14-1b771ebb6c2c | Not Translated (0%) | 97 | 97 |
| 6576a5fa39c7-b250-4a9f-be91-c017a7360408 | Not Translated (0%) | C | C |
| 657762f1eadc-c878-4647-9084-d3f69c734202 | Not Translated (0%) | 8 | 8 |
| 6578a43c76c1-6df4-4197-850c-643c047986f0 | Not Translated (0%) | A | A |
| 657936069422-73db-435e-84f1-750715a43b23 | Not Translated (0%) | 38 | 38 |
| 6580afdf7679-9a2a-4b41-a028-f26a9d1026f7 | Not Translated (0%) | A | A |
| 6581a954f25b-afa7-4c23-9009-56629d7e5750 | Not Translated (0%) | 68 | 68 |
| 6582b22bc197-a5f8-40c1-87e4-c78f9e4cd991 | Not Translated (0%) | B | B |
| 65836106e90e-6230-4094-9b57-afb6702a82a7 | Not Translated (0%) | 98 | 98 |
| 6584374a7323-73c8-40bb-801b-81324e83aac8 | Not Translated (0%) | D | D |
| 6585e9973635-c606-4eb3-95ad-247391dce694 | Not Translated (0%) | 9 | 9 |
| 6586deecf772-f03f-4049-9dde-663be3d8ed8c | Not Translated (0%) | D | D |
| 6587e88304b8-1cfd-45d4-bd75-83dfa9698b4e | Not Translated (0%) | 39 | 39 |
| 6588e774ce1e-eaed-4759-b3be-729b4da0b3fa | Not Translated (0%) | C | C |
| 658944033a0d-603e-473f-ac94-19b1a5afbe57 | Not Translated (0%) | 69 | 69 |
| 65902db61b37-ce83-45df-b38a-c76fcf10d4bc | Not Translated (0%) | B | B |
| 65915dbc1164-e430-4524-9566-adc339d94778 | Not Translated (0%) | 99 | 99 |
| 659228153b28-d8ad-4495-9b47-a58dacb7774b | Not Translated (0%) | D | D |
| 6593f9a7213c-64af-4a52-9cfc-9d51ffc74c55 | Not Translated (0%) | 10 | 10 |
| 65948a175dc1-0e35-462a-a853-ce49f5c8dbaa | Not Translated (0%) | A | A |
| 6595ab903665-32bb-4486-b533-5ffd6e4a3235 | Not Translated (0%) | 40 | 40 |
| 659688b438f8-39bb-4499-aead-862365d3d177 | Not Translated (0%) | B | B |
| 6597058fc3f7-7724-4cc6-a834-83f865984afd | Not Translated (0%) | 70 | 70 |
| 6598945eff3d-5dcf-446f-90d2-5d5a48d8349d | Not Translated (0%) | C | C |
| 65997af56dea-ef29-4d55-bacf-3dd4d9d349a4 | Not Translated (0%) | 100 | 100 |
| 6600d0fcef32-e9d5-4771-8ea7-2f2728291db9 | Not Translated (0%) | C | C |
| 66016961c8b1-50ed-4c27-bc1d-66a2a2a4ec5d | Not Translated (0%) | 11 | 11 |
| 6602333242f7-13b8-4cad-b083-9e5f2ef9eec7 | Not Translated (0%) | A | A |
| 6603b1299b05-f0c7-4a99-9d33-c6989c45794a | Not Translated (0%) | 41 | 41 |
| 6604dcbeab5e-87bc-472b-bfab-73b9d5f5b960 | Not Translated (0%) | D | D |
| 660545fca72f-7bd4-48ca-85c6-3335c9737bac | Not Translated (0%) | 71 | 71 |
| 6606b86a543f-de65-48ad-8b80-c18cbe70af54 | Not Translated (0%) | D | D |
| 6607504eda7a-ef1e-4335-8593-d4392fe657a1 | Not Translated (0%) | 101 | 101 |
| 6608a8e2fed0-0029-4eb0-9013-9a2aa20d606e | Not Translated (0%) | A | A |
| 660970573700-0159-445a-8243-7768b7e5a958 | Not Translated (0%) | 12 | 12 |
| 6610d97b9407-0997-43a8-8e64-96aef09728c9 | Not Translated (0%) | B | B |
| 6611cd01a690-5a69-4d53-aa56-d5339520fb77 | Not Translated (0%) | 42 | 42 |
| 661285408a37-dcba-4e74-a615-16771ef26a80 | Not Translated (0%) | A | A |
| 661317d82bb5-c920-427b-bef0-608a4f8b8fba | Not Translated (0%) | 72 | 72 |
| 66144048c356-0290-4839-865e-7f29512e8cdc | Not Translated (0%) | B | B |
| 661582898a4f-0c0f-48bc-b2e8-683d5cecbd40 | Not Translated (0%) | 102 | 102 |
| 66169141ca73-117c-43b0-bdb7-76c8bf1c30ca | Not Translated (0%) | A | A |
| 66175dec3b83-37a0-4955-878b-ded26ba16877 | Not Translated (0%) | 13 | 13 |
| 661807315963-904f-41bf-93ad-89b4679529e5 | Not Translated (0%) | C | C |
| 661956d15631-8d32-4afc-905e-7ce307ae7c08 | Not Translated (0%) | 43 | 43 |
| 662078fc7848-ad76-4829-8e32-6d6c3a170813 | Not Translated (0%) | D | D |
| 6621000ce9aa-1b92-42fd-b12a-6c00c852b1b4 | Not Translated (0%) | 73 | 73 |
| 6622808fc413-4737-47b2-a8a9-faffec59e3dd | Not Translated (0%) | A | A |
| 6623953f2e48-c159-46ac-a815-00c519886642 | Not Translated (0%) | 103 | 103 |
| 6624f332046f-b0da-4423-8e8b-6bb171ca3fb9 | Not Translated (0%) | C | C |
| 66257e82a0b6-efe0-44b0-867a-d5fca62d3d50 | Not Translated (0%) | 14 | 14 |
| 66267398024a-a489-44b6-869a-d454ac05f45e | Not Translated (0%) | B | B |
| 662761e9791f-a338-4484-8f89-08ba4fd1a98f | Not Translated (0%) | 44 | 44 |
| 6628b3c057a9-a50b-4bf7-9496-953fb5e3fb28 | Not Translated (0%) | C | C |
| 6629617dd119-7ca0-4135-8ff2-18155d9b70d6 | Not Translated (0%) | 74 | 74 |
| 66304bc10120-56c1-46db-8dcf-019866e2ef7d | Not Translated (0%) | C | C |
| 66313cbd397a-cceb-4cff-93b4-2ce1b2220f8c | Not Translated (0%) | 104 | 104 |
| 6632d41db208-1b89-4b53-985e-14b7da85ba39 | Not Translated (0%) | B | B |
| 6633ec7e9fc6-074f-433f-9a91-6ffb23a7112f | Not Translated (0%) | 15 | 15 |
| 663427750c92-80ee-4e60-9955-d9fd496bf0dd | Not Translated (0%) | C | C |
| 66354d337271-af96-443a-a231-f1fd8300a1f8 | Not Translated (0%) | 45 | 45 |
| 663647c65df9-7def-484b-aa94-47251bdca385 | Not Translated (0%) | A | A |
| 6637815beaa3-aded-4cc6-9bf3-43fce16c89f6 | Not Translated (0%) | 75 | 75 |
| 66388247fb63-66e0-4d04-8ea2-5d1168b405a6 | Not Translated (0%) | A | A |
| 6639e56c9bc3-5e27-4351-be28-b2353886f8ff | Not Translated (0%) | 105 | 105 |
| 66402d199471-a7f7-4240-bbde-1d901778acb1 | Not Translated (0%) | B | B |
| 66411da015c4-0b90-4607-abda-5c01e9193edd | Not Translated (0%) | 16 | 16 |
| 664211e18a25-9b05-4cd0-b52c-77a2c4838029 | Not Translated (0%) | D | D |
| 664305083f69-abeb-4e59-bfb9-63a58a879c64 | Not Translated (0%) | 46 | 46 |
| 6644b6bacf0b-b64e-4ab9-885d-756b65c7ca45 | Not Translated (0%) | B | B |
| 6645f8cb5d0e-e64f-4484-99ca-c57a464667ab | Not Translated (0%) | 76 | 76 |
| 6646f9179a13-50a3-492f-a019-cbef01a49f9d | Not Translated (0%) | C | C |
| 664749d2b499-daae-438d-acd4-d0d8fc2df750 | Not Translated (0%) | 106 | 106 |
| 664879543fed-0836-482e-9206-02cb811784b9 | Not Translated (0%) | A | A |
| 66493aadecfb-6ada-451c-9eb0-36e96739c4c7 | Not Translated (0%) | 17 | 17 |
| 6650b561fab4-38cd-43f3-a5a5-23579f9409b6 | Not Translated (0%) | A | A |
| 6651874ab3ed-5947-47f1-86ed-e9d58f9a529e | Not Translated (0%) | 47 | 47 |
| 6652b181b5e1-8a07-4569-97d3-7ae327f7bfcb | Not Translated (0%) | C | C |
| 665380e8faac-6f58-4ddd-af89-0fdef9e90a71 | Not Translated (0%) | 77 | 77 |
| 6654f58ad997-01e7-41ee-915d-7bfea06faa41 | Not Translated (0%) | D | D |
| 665540c29e78-9f7f-450d-a182-f3d46227de77 | Not Translated (0%) | 107 | 107 |
| 6656e00ed248-72cb-46f8-b0c6-d2ba6470ffae | Not Translated (0%) | C | C |
| 6657d57b5fe6-9069-4d50-8e88-f4af25ce4775 | Not Translated (0%) | 18 | 18 |
| 6658f3afd409-543f-4dc3-bbbb-760226aa4b58 | Not Translated (0%) | B | B |
| 6659e5f8e78e-0b77-47cf-ae56-623de0f42b30 | Not Translated (0%) | 48 | 48 |
| 66608bc191ad-3aeb-467b-9e62-ecf961bee837 | Not Translated (0%) | D | D |
| 6661a7e80609-0f48-4169-b18e-7681037f8935 | Not Translated (0%) | 78 | 78 |
| 6662e1472488-d6a5-4bb8-8ac3-d48ec9b3858f | Not Translated (0%) | C | C |
| 6663281035c6-8ed2-4022-9e43-5cc6594c3702 | Not Translated (0%) | 108 | 108 |
| 6664caddaf70-c899-4588-ba2c-90133aac752c | Not Translated (0%) | A | A |
| 666541e5e6b2-788c-4088-a96a-db54626f7c19 | Not Translated (0%) | 19 | 19 |
| 66661908245d-4448-439f-8234-5fc99b8b2563 | Not Translated (0%) | A | A |
| 6667b993a504-9c10-4274-99a0-5e6bd1885e93 | Not Translated (0%) | 49 | 49 |
| 6668fe3ae7d9-e493-4bcc-b744-78c5615a6b50 | Not Translated (0%) | B | B |
| 6669beebc6bc-6a22-4922-8be0-c22de1b769cf | Not Translated (0%) | 79 | 79 |
| 6670eb9e4a47-1d48-4a24-b845-73150aaf810b | Not Translated (0%) | D | D |
| 667137b9a838-8625-4779-a5ce-385dbfcf02be | Not Translated (0%) | 109 | 109 |
| 66729fe013bc-4766-4634-bde5-78d566e6ed65 | Not Translated (0%) | D | D |
| 66738b9dba6f-dbc8-4335-9477-94e9d48ce188 | Not Translated (0%) | 20 | 20 |
| 667462c1e4ad-508e-49a3-acdd-e18aac6d123c | Not Translated (0%) | D | D |
| 66753f4c45d1-c99e-40d9-a6b7-bda9115fadb5 | Not Translated (0%) | 50 | 50 |
| 6676aed641ce-7ce3-432c-b432-0be278e68de0 | Not Translated (0%) | C | C |
| 66770c543333-b2f4-40b8-8f77-34fbe06c5643 | Not Translated (0%) | 80 | 80 |
| 667832f5963c-6eb6-405c-a78f-929a3ff92af5 | Not Translated (0%) | A | A |
| 6679cab148f1-599e-44f5-ad03-120ebdc7a5ad | Not Translated (0%) | 110 | 110 |
| 668088d2f684-4e69-4ede-95c8-709ab8e03b2c | Not Translated (0%) | C | C |
| 66816c01f07a-e3f1-4a8b-9333-5e2917cedf27 | Not Translated (0%) | 21 | 21 |
| 6682305eb928-8453-4bf4-aa9d-9b42ce7515a8 | Not Translated (0%) | C | C |
| 6683899acc03-755e-4390-9f42-35c9701b6486 | Not Translated (0%) | 51 | 51 |
| 66840a6d7e78-1c6f-4b72-b29e-3af0ee378b26 | Not Translated (0%) | A | A |
| 668526cfa2ee-e104-488d-a07b-8008dee0ed31 | Not Translated (0%) | 81 | 81 |
| 668690402af0-e2ab-498d-aefa-d11542388c1f | Not Translated (0%) | A | A |
| 66875cf94128-fc3c-4d23-b0a7-8583bfcfe0bd | Not Translated (0%) | 111 | 111 |
| 6688be43a6e7-4a7e-4fb9-9d15-98ac8111423f | Not Translated (0%) | B | B |
| 6689bb89fc8a-2e52-4cac-93eb-34e115b297c9 | Not Translated (0%) | 22 | 22 |
| 6690132985f3-3d07-4252-b25d-84de3d4b765a | Not Translated (0%) | A | A |
| 6691fe3937db-b57a-43c5-871c-40bbca38664b | Not Translated (0%) | 52 | 52 |
| 66921bc311c3-e6ea-4cf1-bb41-28a676b896a4 | Not Translated (0%) | B | B |
| 66934a92088b-cfc9-4013-8d07-3a47b745e87d | Not Translated (0%) | 82 | 82 |
| 66946b8e308e-3876-483d-9049-20656efe1056 | Not Translated (0%) | B | B |
| 6695b3c2d66a-7919-4f81-9d52-d8cec8bf026e | Not Translated (0%) | 112 | 112 |
| 66969425d49c-6610-4f2b-8a77-061048200bd8 | Not Translated (0%) | D | D |
| 6697275fdef8-3dcc-4321-8af2-57043ac3bc26 | Not Translated (0%) | 23 | 23 |
| 6698cb41c9ae-5abd-4cee-905c-e304867ae1a2 | Not Translated (0%) | B | B |
| 66995c54fc2d-0647-45dc-8efc-c265f850c0c5 | Not Translated (0%) | 53 | 53 |
| 6700d6e8be87-ee25-4145-ac7c-05f9df05046a | Not Translated (0%) | C | C |
| 670142ce6b67-e8c2-425f-b9af-776f0652811c | Not Translated (0%) | 83 | 83 |
| 6702501bc226-d934-4844-a28b-a611826afa0c | Not Translated (0%) | D | D |
| 6703522a3127-c1c8-415a-a4e1-415c94dbac53 | Not Translated (0%) | 113 | 113 |
| 67044fb70da4-5756-4980-8a97-475899c369cf | Not Translated (0%) | C | C |
| 67053be1f36a-1ac6-4b02-8c31-44e1ad75ad6b | Not Translated (0%) | 24 | 24 |
| 6706727701aa-7e1f-40d9-a831-bd54a9b219e8 | Not Translated (0%) | C | C |
| 6707108976f1-619c-447a-a5cf-b2703657f5c4 | Not Translated (0%) | 54 | 54 |
| 67087797281e-37d8-40f0-99d7-55cc8bdc1176 | Not Translated (0%) | A | A |
| 6709a5da130c-d858-4c78-8546-a095d5fa7be1 | Not Translated (0%) | 84 | 84 |
| 6710dd498d10-8246-4bcc-a489-aa8e06c85df3 | Not Translated (0%) | B | B |
| 671125787983-36ec-48d3-a56f-d1123c13c9fb | Not Translated (0%) | 114 | 114 |
| 671222722732-c77d-48da-99eb-00c88c730c5b | Not Translated (0%) | B | B |
| 6713572f0573-35bb-44d2-8519-2aa07b56fd99 | Not Translated (0%) | 25 | 25 |
| 67145615e4a0-a2a1-4b68-9a24-7cb24e003818 | Not Translated (0%) | A | A |
| 671510d68ed9-2db3-46e9-b8a2-bd0e5ae4e5eb | Not Translated (0%) | 55 | 55 |
| 67160bb00ba2-bf26-48de-9f6e-cce7874c122d | Not Translated (0%) | D | D |
| 6717142ef429-f1ef-4dcf-bfd4-d95cfc5bc61b | Not Translated (0%) | 85 | 85 |
| 6718e585cc11-947e-46c7-a357-70aa797531c1 | Not Translated (0%) | C | C |
| 671912ee9a24-8ca2-4539-9d76-c19307dd6048 | Not Translated (0%) | 115 | 115 |
| 67202cce6226-3292-4f50-997b-7ea48542baab | Not Translated (0%) | A | A |
| 672162d09ef5-7804-4d9f-8c64-dd2783fd32b2 | Not Translated (0%) | 26 | 26 |
| 672256ef6c73-e003-4933-b1a1-82b9bcaf5e4b | Not Translated (0%) | D | D |
| 67231634659b-715b-4e24-a7ee-dd3068bf6858 | Not Translated (0%) | 56 | 56 |
| 6724186feb97-d8af-4a7a-9879-b845397f351d | Not Translated (0%) | C | C |
| 6725d2026f22-f6db-49b0-b8e2-0070f5f619d1 | Not Translated (0%) | 86 | 86 |
| 6726b594cb7c-21a0-436f-9d00-c239d966edf3 | Not Translated (0%) | D | D |
| 6727f28208da-1a24-48ac-9ef8-032fe41bfe69 | Not Translated (0%) | 116 | 116 |
| 672852bf1575-b1b1-4c11-a42b-7c986537d4a0 | Not Translated (0%) | C | C |
| 6729fdf4a3f4-92e1-4866-a740-20aed2caedd6 | Not Translated (0%) | 27 | 27 |
| 6730974faae3-70e6-4641-a1b6-bf3b36e8139f | Not Translated (0%) | C | C |
| 67310d74b963-2d0c-4f28-acf4-e57e73df7983 | Not Translated (0%) | 57 | 57 |
| 673270312d1e-9547-4958-a942-fd873a810894 | Not Translated (0%) | A | A |
| 6733f90412aa-c374-40ad-bfa8-aadc1b905796 | Not Translated (0%) | 87 | 87 |
| 67345803d342-e62d-453e-8046-0fb65953a592 | Not Translated (0%) | A | A |
| 67357cd8459f-dadf-4557-b9ac-45b562369e54 | Not Translated (0%) | 117 | 117 |
| 6736372342cc-6be3-44bd-a22d-35a8efc83f05 | Not Translated (0%) | B | B |
| 67377bd16af4-c0a9-4b74-a461-1c09f37f5e1e | Not Translated (0%) | 28 | 28 |
| 6738808254a1-02aa-4398-b6a1-e09a59c4b5be | Not Translated (0%) | B | B |
| 6739f6363d60-7d8c-49e8-819e-75fe9c1a25ed | Not Translated (0%) | 58 | 58 |
| 6740be3dfd1f-5f73-4c45-9ea7-864baade47d1 | Not Translated (0%) | B | B |
| 67415bc0f63f-80c7-465b-bb7a-c1a3abd61fc5 | Not Translated (0%) | 88 | 88 |
| 6742452dcca8-6c2e-438f-ab2f-61e29b63ece3 | Not Translated (0%) | B | B |
| 67436703ffd3-83fc-4a5c-9a51-e27426e3cba2 | Not Translated (0%) | 118 | 118 |
| 6744ca98d5de-e74e-4254-841d-afa0eb98d68a | Not Translated (0%) | A | A |
| 6745372dd39d-af93-43e7-86e8-e62175a53e7a | Not Translated (0%) | 29 | 29 |
| 67465bea9756-a38a-4647-afdf-f1b7acc86df1 | Not Translated (0%) | D | D |
| 674770e7a294-3231-42cb-bac9-f8f4208cd9c3 | Not Translated (0%) | 59 | 59 |
| 67489f6e0780-8eda-48fa-8165-58311a39fcc7 | Not Translated (0%) | B | B |
| 6749a5ab28c5-1308-469e-95b0-3217678d0be9 | Not Translated (0%) | 89 | 89 |
| 67509a7ac6bf-d3c1-4014-bb57-724929f9291f | Not Translated (0%) | C | C |
| 6751de1a13de-a9c0-4baf-959f-d21b2dcdc5ec | Not Translated (0%) | 30 | 30 |
| 675235e0e383-74c1-429e-9b8d-e020e56b8f23 | Not Translated (0%) | B | B |
| 675373d44bba-2f54-4472-8c37-b0590ca958d8 | Not Translated (0%) | 60 | 60 |
| 675481a39e1e-7026-4a93-bbc9-f129a58be2b7 | Not Translated (0%) | C | C |
| 675549e0c368-b9e3-46ae-b5c7-f044efbc220d | Not Translated (0%) | 90 | 90 |
| 6756c2810fcd-6e2b-4f95-9494-aa704bc04c66 | Not Translated (0%) | D | D |
| 67577bd2da3d-8eec-42a5-8a8c-e8778ad45a92 | Not Translated (0%) | Appendix | Appendix |
| 675855c3f0e7-f6b7-4fd8-bef6-46d8b0b14433 | Not Translated (0%) | Guidance Documents and Reference Material | Guidance Documents and Reference Material |
| 67597e0cc63f-f685-4617-8d1a-75da18d9a7d9 | Not Translated (0%) | This section cites several CGSS Examination supporting documents and reference materials. | This section cites several CGSS Examination supporting documents and reference materials. |
| 67607e0cc63f-f685-4617-8d1a-75da18d9a7d9 | Not Translated (0%) | It also suggests websites and periodicals that offer additional supporting material. | It also suggests websites and periodicals that offer additional supporting material. |
| 67617e0cc63f-f685-4617-8d1a-75da18d9a7d9 | Not Translated (0%) | Several international bodies that are focused on sanctions/CFT have published valuable guidance documents and reference materials that are helpful in preparing for the CGSS Examination. | Several international bodies that are focused on sanctions/CFT have published valuable guidance documents and reference materials that are helpful in preparing for the CGSS Examination. |
| 6762d27222ad-96e1-44cf-9c33-bc2b0461d4eb | Not Translated (0%) | For study purposes, the reference documents generally have an introduction, putting the material in context and providing background as to why the government or body is taking action, for example, to control the proliferation of military weapons. | For study purposes, the reference documents generally have an introduction, putting the material in context and providing background as to why the government or body is taking action, for example, to control the proliferation of military weapons. |
| 6763d27222ad-96e1-44cf-9c33-bc2b0461d4eb | Not Translated (0%) | Often the material will then provide the regulatory framework and obligations that the framework imposes. | Often the material will then provide the regulatory framework and obligations that the framework imposes. |
| 6764bd2f8cc4-5922-4c94-bfec-48e5de5b87e7 | Not Translated (0%) | The Frequently Asked Questions (FAQs) are particularly helpful as these highlight areas of sanctions compliance that are traditionally problematic for firms. | The Frequently Asked Questions (FAQs) are particularly helpful as these highlight areas of sanctions compliance that are traditionally problematic for firms. |
| 6765bd2f8cc4-5922-4c94-bfec-48e5de5b87e7 | Not Translated (0%) | For example, within OFAC’s FAQs there are various examples of companies that are SDNs having different levels of ownership in another company and whether the facts in the example would lead to the company of interest being blocked. | For example, within OFAC’s FAQs there are various examples of companies that are SDNs having different levels of ownership in another company and whether the facts in the example would lead to the company of interest being blocked. |
| 6766bd2f8cc4-5922-4c94-bfec-48e5de5b87e7 | Not Translated (0%) | Additionally, on May 2, 2019, OFAC published A Framework for OFAC Compliance Commitments. | Additionally, on May 2, 2019, OFAC published A Framework for OFAC Compliance Commitments. |
| 6767bd2f8cc4-5922-4c94-bfec-48e5de5b87e7 | Not Translated (0%) | It is suggested that this material be studied and included with other material to build a solid foundation for future learning and growth in the area of sanctions compliance. | It is suggested that this material be studied and included with other material to build a solid foundation for future learning and growth in the area of sanctions compliance. |
| 6768bfd20419-7102-424e-b6f7-9515626db003 | Not Translated (0%) | Guidance Documents and Reference Material | Guidance Documents and Reference Material |
| 6769904de73d-be93-4379-b1e5-f8bed24bb638 | Not Translated (0%) | United Nations: | United Nations: |
| 6770904de73d-be93-4379-b1e5-f8bed24bb638 | Not Translated (0%) | http://www.un.org | http://www.un.org |
| 67712868a427-07f9-466a-bd05-84acfdf12060 | Not Translated (0%) | Sanctions Committee Information | Sanctions Committee Information |
| 67723750a9f2-82e8-430d-bf22-7773b8ffc3d1 | Not Translated (0%) | Subsidiary Organs of the United Nations Security Council: | Subsidiary Organs of the United Nations Security Council: |
| 67733750a9f2-82e8-430d-bf22-7773b8ffc3d1 | Not Translated (0%) | FACT Sheets (2019) | FACT Sheets (2019) |
| 67742b237747-1b61-4ee5-ad6d-f69982b20059 | Not Translated (0%) | United Nations Security Council Consolidated List | United Nations Security Council Consolidated List |
| 677544c4859c-faee-44a1-a3e6-cdb8a1786a2d | Not Translated (0%) | International Atomic Energy Agency | International Atomic Energy Agency |
| 67768cd26105-039a-4249-9806-32ab68c4568d | Not Translated (0%) | European Union: https://europa.eu | European Union: https://europa.eu |
| 6777c1242b8f-39ab-4132-9921-244628d68cee | Not Translated (0%) | EU’s Service for Policy Instruments | EU’s Service for Policy Instruments |
| 6778d271b009-f3d8-4a88-bc11-336a5b72b687 | Not Translated (0%) | EU Sanctions Map | EU Sanctions Map |
| 6779b7324af9-fa23-48c4-9b70-20e36d990e6d | Not Translated (0%) | Frequently Asked Questions on EU Restrictive Measures (Sept. 2014) | Frequently Asked Questions on EU Restrictive Measures (Sept. 2014) |
| 67801af5097c-6729-4055-9c60-4913537d7603 | Not Translated (0%) | Sanctions: | Sanctions: |
| 67811af5097c-6729-4055-9c60-4913537d7603 | Not Translated (0%) | How and When the EU Adopts Restrictive Measures, including links to: | How and When the EU Adopts Restrictive Measures, including links to: |
| 6782ed951b2d-d6be-4fd0-a2c2-3271d28ddf2d | Not Translated (0%) | Guidelines on the implementation and evaluation of restrictive measures (sanctions) | Guidelines on the implementation and evaluation of restrictive measures (sanctions) |
| 6783d6336bed-266f-4e87-a234-f6d0eb18c8c8 | Not Translated (0%) | Best practices for the effective implementation of restrictive measures | Best practices for the effective implementation of restrictive measures |
| 6784ebf6f12a-cf94-41f8-a6dc-7fa50dac3c8e | Not Translated (0%) | Basic principles on the use of restrictive measures (sanctions) | Basic principles on the use of restrictive measures (sanctions) |
| 6785538ce666-8833-4c00-be0f-5954082ad710 | Not Translated (0%) | Political and Security Committee (PSC) | Political and Security Committee (PSC) |
| 6786de65dcf8-7bfa-443b-b09e-871466eddc0e | Not Translated (0%) | United States: https://<18769>www.usa.gov</18769> | United States: https://<18769>www.usa.gov</18769> |
| 6787ef5e75ad-61bd-41cb-84b9-3e6ef59f0b75 | Not Translated (0%) | Office of Foreign Assets Control: https://home.treasury.gov/ | Office of Foreign Assets Control: https://home.treasury.gov/ |
| 67888a31c451-b7b3-47f4-b7ce-15c1fbc17100 | Not Translated (0%) | A Framework for OFAC Compliance Commitments | A Framework for OFAC Compliance Commitments |
| 67898b6efdda-826c-4cb1-84b2-629ec675d39e | Not Translated (0%) | Frequently Asked Questions | Frequently Asked Questions |
| 6790b46cc57e-dfa0-434b-a8c7-2b9b4b2490ea | Not Translated (0%) | Sanctions List Search | Sanctions List Search |
| 6791feb15eef-6e33-47a7-8caa-b689f467d683 | Not Translated (0%) | Sanctions Programs and Country Information | Sanctions Programs and Country Information |
| 67927f01eab4-00a0-47ca-8b7c-aedfc63ce4a2 | Not Translated (0%) | Consolidated Sanctions List Data Files | Consolidated Sanctions List Data Files |
| 679326b47588-57bf-4e7b-a7d2-df4967aeec5b | Not Translated (0%) | Specially Designated Nationals and Blocked Persons List | Specially Designated Nationals and Blocked Persons List |
| 67948b2490ac-4091-4a70-b715-2ca6d7fe3117 | Not Translated (0%) | 311 Actions | 311 Actions |
| 679518bb7f82-1a01-439f-b002-911ad0262cfa | Not Translated (0%) | FinCEN: | FinCEN: |
| 679618bb7f82-1a01-439f-b002-911ad0262cfa | Not Translated (0%) | Special Measures for Jurisdictions, Financial Institutions, or International Transactions of Primary Money Laundering Concern | Special Measures for Jurisdictions, Financial Institutions, or International Transactions of Primary Money Laundering Concern |
| 6797f32950b3-97ef-4b41-8ad0-1492012e8a91 | Not Translated (0%) | Bureau of Industry and Security: https://<18818>www.bis.doc.gov/</18818> | Bureau of Industry and Security: https://<18818>www.bis.doc.gov/</18818> |
| 67981ab9f80f-15bc-4703-9891-2cfb2656c73c | Not Translated (0%) | Licensing | Licensing |
| 6799634991eb-3b62-47b5-83b3-cd1a5fab5aed | Not Translated (0%) | Consolidated Screening List | Consolidated Screening List |
| 68005e08dc1e-0704-4f4c-9eab-4097349845d5 | Not Translated (0%) | United Kingdom: https://<18835>www.gov.uk</18835> | United Kingdom: https://<18835>www.gov.uk</18835> |
| 680109bbe6ef-79b4-4b04-95d5-6a5e747b60ef | Not Translated (0%) | Office of Financial Sanctions Implementation | Office of Financial Sanctions Implementation |
| 6802be5c27a9-2858-4340-9903-3af1db5a3b5c | Not Translated (0%) | Financial Sanctions Guidance (Mar. 2018) | Financial Sanctions Guidance (Mar. 2018) |
| 68034c44a0f6-9a3e-4869-bb8d-ba2f90be8249 | Not Translated (0%) | Financial Sanctions Targets by Regime | Financial Sanctions Targets by Regime |
| 6804afaa7ae0-6fb2-478c-a9b5-402a940fbf19 | Not Translated (0%) | Consolidated List | Consolidated List |
| 68052e3c76b9-25da-41e6-badb-3f8b006e7dbf | Not Translated (0%) | Import and Export Controls | Import and Export Controls |
| 680690711123-5af6-4267-8928-2e44257afe56 | Not Translated (0%) | Australia: https://<18864>www.australia.gov.au</18864> | Australia: https://<18864>www.australia.gov.au</18864> |
| 6807eaec7db3-091e-4dc2-807f-4b22e788b35a | Not Translated (0%) | Sanctions | Sanctions |
| 6808b38a428a-5b6b-4469-b0b7-a7bbd9fa60d4 | Not Translated (0%) | Consolidated List | Consolidated List |
| 6809b7cc7679-0d76-4af2-91fd-4634c0fbe7e7 | Not Translated (0%) | Canada: https://<18881>www.canada.ca/en.html</18881> | Canada: https://<18881>www.canada.ca/en.html</18881> |
| 6810d5350222-94c6-415d-9ce1-9d5e6d6baa71 | Not Translated (0%) | Current Sanctions Imposed by Canada | Current Sanctions Imposed by Canada |
| 6811afa718a6-2ef2-48c4-85e3-d16a2aad8d82 | Not Translated (0%) | Consolidated Canadian Autonomous Sanctions List | Consolidated Canadian Autonomous Sanctions List |
| 6812666d1700-267b-41fd-9fd4-86b048167850 | Not Translated (0%) | Export and Import Controls | Export and Import Controls |
| 6813e39128ae-23f1-4a67-8002-95224373ff89 | Not Translated (0%) | Frequently Asked Questions | Frequently Asked Questions |
| 681413ce68c9-b974-44b1-8486-d16fa07d3233 | Not Translated (0%) | Financial Action Task Force: https://<18906>www.fatf-gafi.org/</18906> | Financial Action Task Force: https://<18906>www.fatf-gafi.org/</18906> |
| 68155d3ff29e-5cf9-4684-86ae-45c136e38597 | Not Translated (0%) | Mutual Evaluation Reports | Mutual Evaluation Reports |
| 68167c20a626-c2a6-4916-8fa1-cb720cb86486 | Not Translated (0%) | High-Risk and Other Monitored Jurisdictions | High-Risk and Other Monitored Jurisdictions |
| 6817159282b1-5742-4300-b849-2c9e56a940e5 | Not Translated (0%) | International Best Practices: | International Best Practices: |
| 6818159282b1-5742-4300-b849-2c9e56a940e5 | Not Translated (0%) | Targeted Sanctions Related to Terrorism and Terrorist Financing (Recommendation 6) | Targeted Sanctions Related to Terrorism and Terrorist Financing (Recommendation 6) |
| 6819b66353a6-0480-46f0-90d8-a68301c57b83 | Not Translated (0%) | The Wassenaar Arrangement: https://<18927>www.wassenaar.org/</18927> | The Wassenaar Arrangement: https://<18927>www.wassenaar.org/</18927> |
| 6820ca572773-775e-46de-8c8b-027f188b2576 | Not Translated (0%) | Frequently Asked Questions | Frequently Asked Questions |
| 68210a437f6d-8059-46f1-bbdf-98937c06c8f5 | Not Translated (0%) | List of Dual-Use Goods and Technologies and Munitions List | List of Dual-Use Goods and Technologies and Munitions List |
| 682265c8ce99-3d1e-4b4f-92f0-264f35ebc931 | Not Translated (0%) | List of Advisory Questions for Industry (adopted 2003; revised 2018) | List of Advisory Questions for Industry (adopted 2003; revised 2018) |
| 68233854f0c3-5c18-4b60-8458-112e18e4903a | Not Translated (0%) | Wolfsberg Group: | Wolfsberg Group: |
| 68243854f0c3-5c18-4b60-8458-112e18e4903a | Not Translated (0%) | www.wolfsberg-principles.com | www.wolfsberg-principles.com |
| 6825fe660ed7-d240-42c1-80c7-693cc0121992 | Not Translated (0%) | Wolfsberg Guidance on Sanctions Screening (issued January 2019) | Wolfsberg Guidance on Sanctions Screening (issued January 2019) |
| 6826e3d717b1-10c8-4e78-aca1-894cc068199d | Not Translated (0%) | Version 1.5 | Version 1.5 |
| 6827a1268c0d-2ad3-4e1b-af5b-d4755ebdadc5 | Not Translated (0%) | A Publication of | A Publication of |
| 68289bcb3776-48f5-4357-b61d-41458c461e0a | Not Translated (0%) | true | true |
| 68297b635252-6a8d-4e74-82fb-d516d8ac15a2 | Not Translated (0%) | abb30e95-1702-45cc-a935-028795b45b0b | abb30e95-1702-45cc-a935-028795b45b0b |
| 68302e4db664-b48e-42f2-aad6-0299d8a26977 | Not Translated (0%) | 0ff03463-356d-4765-825a-0abcbc2d0f43 | 0ff03463-356d-4765-825a-0abcbc2d0f43 |
| 6831b1506373-4439-4b5a-8652-66a650c809ad | Not Translated (0%) | CGSS - Glossary of Terms | CGSS - Glossary of Terms |
| 68329618d993-ae1b-4017-827a-43174e617a8b | Not Translated (0%) | Alert | Alert |
| 6833bfb060ac-eb2b-417f-8fd6-7985f3dd2092 | Not Translated (0%) | A review based on underlying red flags that requires analyst attention. | A review based on underlying red flags that requires analyst attention. |
| 6834bfb060ac-eb2b-417f-8fd6-7985f3dd2092 | Not Translated (0%) | Within know-your-customer procedures, alerts are potential discrepancies that are flagged, either manually or through an automated system, based on defined red flags and underlying typologies. | Within know-your-customer procedures, alerts are potential discrepancies that are flagged, either manually or through an automated system, based on defined red flags and underlying typologies. |
| 6835bfb060ac-eb2b-417f-8fd6-7985f3dd2092 | Not Translated (0%) | Within sanctions screening, an alert is a hit, or multiple hits, of an internal record checked against sanctions screening lists. | Within sanctions screening, an alert is a hit, or multiple hits, of an internal record checked against sanctions screening lists. |
| 6836bfb060ac-eb2b-417f-8fd6-7985f3dd2092 | Not Translated (0%) | If they cannot be resolved easily as false positives, alerts generally result in investigations. | If they cannot be resolved easily as false positives, alerts generally result in investigations. |
| 683791c7e103-2046-4859-8360-b7aa02e7784a | Not Translated (0%) | Asset | Asset |
| 68383308dd77-6ee7-469d-a701-38283704905b | Not Translated (0%) | Anything an individual or legal entity owns that has a monetary value. | Anything an individual or legal entity owns that has a monetary value. |
| 68393308dd77-6ee7-469d-a701-38283704905b | Not Translated (0%) | Fixed assets are those items, such as buildings and equipment, that will be used over a period of time; current assets include raw materials, cash, and any money other parties owe to the individual or legal entity. | Fixed assets are those items, such as buildings and equipment, that will be used over a period of time; current assets include raw materials, cash, and any money other parties owe to the individual or legal entity. |
| 684028fe26ea-ba16-43d3-8981-e3c0a0bbc434 | Not Translated (0%) | Asset blocking | Asset blocking |
| 6841e194f4f2-0f7d-4276-ac8e-8d486136d30e | Not Translated (0%) | The practice of removing an individual or legal entity’s access to assets during or as the result of an investigation into a sanctions violation. | The practice of removing an individual or legal entity’s access to assets during or as the result of an investigation into a sanctions violation. |
| 6842e194f4f2-0f7d-4276-ac8e-8d486136d30e | Not Translated (0%) | Asset blocking is also referred to as freezing an asset. | Asset blocking is also referred to as freezing an asset. |
| 68433b4453d8-dd8e-4a4e-9db8-2d64607a4d5f | Not Translated (0%) | Asset confiscation | Asset confiscation |
| 6844389ef456-ad13-47c5-a8db-d18c1d64c1ef | Not Translated (0%) | The practice of taking ownership of an individual or legal entity’s assets during or as the result of an investigation into a sanctions violation. | The practice of taking ownership of an individual or legal entity’s assets during or as the result of an investigation into a sanctions violation. |
| 68457b270e30-18be-4746-8226-8381e690609a | Not Translated (0%) | Asset flight | Asset flight |
| 68467c7a90c1-8fa1-4ac7-9b0c-fae640e77b5f | Not Translated (0%) | The illegal practice of moving assets from one jurisdiction to another for the purpose of avoiding fines, confiscation, or other penalties. | The illegal practice of moving assets from one jurisdiction to another for the purpose of avoiding fines, confiscation, or other penalties. |
| 6847177ab009-bfcf-4668-bc91-7f7cefbc8287 | Not Translated (0%) | Asset forfeiture | Asset forfeiture |
| 6848750f57de-2692-4991-af79-f698ebf84365 | Not Translated (0%) | Similar to asset seizure, asset forfeiture is an important tool to help law enforcement agencies defund organized crime and prevent the commission of new crimes. | Similar to asset seizure, asset forfeiture is an important tool to help law enforcement agencies defund organized crime and prevent the commission of new crimes. |
| 6849750f57de-2692-4991-af79-f698ebf84365 | Not Translated (0%) | In civil asset forfeiture, assets unrelated to the commission of a crime can be taken from the individual accused of committing a crime. | In civil asset forfeiture, assets unrelated to the commission of a crime can be taken from the individual accused of committing a crime. |
| 6850138983ac-20ec-42a6-a19c-d1883f1a041b | Not Translated (0%) | Asset freezing | Asset freezing |
| 6851589a0352-ee23-4ca9-ba16-9a5d7ed36a53 | Not Translated (0%) | The prevention of a person targeted by sanctions from accessing or using his or her bank account or other financial assets. | The prevention of a person targeted by sanctions from accessing or using his or her bank account or other financial assets. |
| 6852589a0352-ee23-4ca9-ba16-9a5d7ed36a53 | Not Translated (0%) | Asset freezing is also referred to as blocking an asset. | Asset freezing is also referred to as blocking an asset. |
| 6853028db577-b59a-44e4-bdc8-9bb03201cc48 | Not Translated (0%) | Asset mingling | Asset mingling |
| 685464739c4c-3885-4fa3-a3da-ba9efb70cb00 | Not Translated (0%) | The illegal practice of purchasing assets, such as real estate properties, using a blend of legal and illegal funds as a means of making matches more complicated. | The illegal practice of purchasing assets, such as real estate properties, using a blend of legal and illegal funds as a means of making matches more complicated. |
| 68555747ff74-b0a7-42dd-bd26-cbe24674d646 | Not Translated (0%) | Asset seizure | Asset seizure |
| 68563e5b1d32-a5aa-4797-8479-b9765ef7d754 | Not Translated (0%) | see asset confiscation | see asset confiscation |
| 6857cf3a6d10-5508-4368-a88e-021da8c4d445 | Not Translated (0%) | Asset structuring | Asset structuring |
| 6858744d002c-e5cc-42e0-a656-e8dab30213a7 | Not Translated (0%) | see structuring | see structuring |
| 6859e772d6c8-63f6-4db9-9b61-7048ad2e191f | Not Translated (0%) | Automated screening tool (AST) | Automated screening tool (AST) |
| 6860fee80860-fff8-4185-8f80-715fce9f53c9 | Not Translated (0%) | Software systems used by large financial institutions to facilitate the screening process, as opposed to manual screening. | Software systems used by large financial institutions to facilitate the screening process, as opposed to manual screening. |
| 6861fee80860-fff8-4185-8f80-715fce9f53c9 | Not Translated (0%) | In general, ASTs are designed to screen against sanctions lists. | In general, ASTs are designed to screen against sanctions lists. |
| 6862fee80860-fff8-4185-8f80-715fce9f53c9 | Not Translated (0%) | ASTs generate hits against sanctions lists that may be consolidated into alerts based on, for example, a customer record. | ASTs generate hits against sanctions lists that may be consolidated into alerts based on, for example, a customer record. |
| 6863fee80860-fff8-4185-8f80-715fce9f53c9 | Not Translated (0%) | For one customer record there may be multiple hits against sanctions lists that are consolidated under one alert. | For one customer record there may be multiple hits against sanctions lists that are consolidated under one alert. |
| 6864bc887562-b4ba-48ea-9127-45c729a45d5c | Not Translated (0%) | Autonomous sanctions | Autonomous sanctions |
| 686582218317-04ae-4521-b4e3-c10ee8511bc0 | Not Translated (0%) | A single entity, whether a government or a coalition of governments, such as the EU, acting to implement and enforce a sanctions regime. | A single entity, whether a government or a coalition of governments, such as the EU, acting to implement and enforce a sanctions regime. |
| 686682218317-04ae-4521-b4e3-c10ee8511bc0 | Not Translated (0%) | See unilateral sanctions. | See unilateral sanctions. |
| 68671bf3198c-b879-4960-9246-0bdaff87ea20 | Not Translated (0%) | Back-to-back letters of credit | Back-to-back letters of credit |
| 686855bc122e-855e-4cd7-b5b4-297240f407ac | Not Translated (0%) | A form of financing in which Bank A issues a letter of credit as collateral to Bank B in order to issue a separate letter of credit to the beneficiary. | A form of financing in which Bank A issues a letter of credit as collateral to Bank B in order to issue a separate letter of credit to the beneficiary. |
| 686955bc122e-855e-4cd7-b5b4-297240f407ac | Not Translated (0%) | This often happens when the underlying agreement between the applicant and beneficiary contains restrictions about the credit quality of the bank that is issuing the letter of credit, the location of the issuing bank, or other stipulations that prevent the applicant’s bank from issuing a direct letter of credit to the beneficiary. | This often happens when the underlying agreement between the applicant and beneficiary contains restrictions about the credit quality of the bank that is issuing the letter of credit, the location of the issuing bank, or other stipulations that prevent the applicant’s bank from issuing a direct letter of credit to the beneficiary. |
| 687055bc122e-855e-4cd7-b5b4-297240f407ac | Not Translated (0%) | A sanctions evader can use a back-to-back letter of credit to remove the name of a sanctioned bank from the documentation. | A sanctions evader can use a back-to-back letter of credit to remove the name of a sanctioned bank from the documentation. |
| 687183e9849a-7d52-42c3-a17a-9c704f29fd60 | Not Translated (0%) | Batch screening | Batch screening |
| 6872cd039a48-079d-4e3b-bbea-491a564cc0cc | Not Translated (0%) | The process of screening a firm’s entire customer base and other associated entities, such as vendors, with ASTs on a periodic basis. | The process of screening a firm’s entire customer base and other associated entities, such as vendors, with ASTs on a periodic basis. |
| 6873748e7608-f305-4d81-b22a-f00ce02f9b36 | Not Translated (0%) | Beneficial owner | Beneficial owner |
| 6874f8902f21-2b5c-492c-bbca-ebf92680fa65 | Not Translated (0%) | The term “beneficial owner” has two different definitions depending on the context: | The term “beneficial owner” has two different definitions depending on the context: |
| 6875e057b6d7-5830-42c4-9351-12c7d9cbfb02 | Not Translated (0%) | The natural person who ultimately owns or controls an account through which a transaction is being conducted | The natural person who ultimately owns or controls an account through which a transaction is being conducted |
| 68765ef25111-8034-4c50-b3bd-50d0553b6ee8 | Not Translated (0%) | The natural people who have significant ownership of, as well as those who exercise ultimate effective control over, a legal person or arrangement | The natural people who have significant ownership of, as well as those who exercise ultimate effective control over, a legal person or arrangement |
| 6877edef50ca-4f47-4bc5-a65c-0e2fa2e6f8db | Not Translated (0%) | Bill of exchange | Bill of exchange |
| 6878a77698da-3415-4250-acc7-499e4fab263e | Not Translated (0%) | A shipping document that shows the means by which exporters are paid for the goods that are to be shipped, including information such as the names of the exporter, importer, issuing bank, and the bank where the funds will be drawn. | A shipping document that shows the means by which exporters are paid for the goods that are to be shipped, including information such as the names of the exporter, importer, issuing bank, and the bank where the funds will be drawn. |
| 6879f675a670-a1ec-4950-9d41-89b58be503df | Not Translated (0%) | Bill of lading | Bill of lading |
| 688097471ceb-590d-489f-a972-d6d251a26c50 | Not Translated (0%) | A required document that a carrier issues as a receipt of cargo. | A required document that a carrier issues as a receipt of cargo. |
| 688197471ceb-590d-489f-a972-d6d251a26c50 | Not Translated (0%) | It includes the type and quantity of cargo, as well as the destination. | It includes the type and quantity of cargo, as well as the destination. |
| 68826d67def3-e753-49ab-836b-6c18f08cf050 | Not Translated (0%) | Blacklist | Blacklist |
| 6883cf655ab1-cac8-4ab6-864d-e186dbbb7f25 | Not Translated (0%) | An internal list of names (including places, persons, entities, and individuals) that are screened to identify any sanctions exposure, in addition to government and vendor-maintained sanctions lists. | An internal list of names (including places, persons, entities, and individuals) that are screened to identify any sanctions exposure, in addition to government and vendor-maintained sanctions lists. |
| 6884cf655ab1-cac8-4ab6-864d-e186dbbb7f25 | Not Translated (0%) | Other potential additions to a firm’s internal blacklist may come from OFAC advisories and other warnings that list entities that did not merit being placed on the SDN list, but are still considered high risk. | Other potential additions to a firm’s internal blacklist may come from OFAC advisories and other warnings that list entities that did not merit being placed on the SDN list, but are still considered high risk. |
| 6885cf655ab1-cac8-4ab6-864d-e186dbbb7f25 | Not Translated (0%) | The FATF blacklist is a list of countries that FATF has determined are noncooperative in the international fight against money laundering and terrorist financing. | The FATF blacklist is a list of countries that FATF has determined are noncooperative in the international fight against money laundering and terrorist financing. |
| 68860fc12d1d-909c-4473-8435-440e80f570b6 | Not Translated (0%) | Blockade | Blockade |
| 688749d7277e-0f60-46fd-97be-30b7025f513d | Not Translated (0%) | The deployment of military resources by land, air, or sea, by a country or coalition to prevent the movement of goods or people into or out of a targeted country. | The deployment of military resources by land, air, or sea, by a country or coalition to prevent the movement of goods or people into or out of a targeted country. |
| 6888672bfcc0-e11a-4c03-8175-b889f9e98a40 | Not Translated (0%) | Block | Block |
| 688946577095-981b-4c54-a7c9-19f360e840eb | Not Translated (0%) | See asset freezing | See asset freezing |
| 689072163760-359f-4701-9730-11bfcb5381e0 | Not Translated (0%) | Boycott | Boycott |
| 6891e6bcd79d-65b4-42c5-ba71-12e0e561101e | Not Translated (0%) | A punitive withdrawal from business or social engagement with a government, organization, or individual as a sign of protest. | A punitive withdrawal from business or social engagement with a government, organization, or individual as a sign of protest. |
| 6892359070d5-4541-4a3b-a93b-b678e0d3d687 | Not Translated (0%) | Bureau of Industry and Security (BIS) | Bureau of Industry and Security (BIS) |
| 68935a7ce1ec-648c-4862-bc75-242b1b7c0a64 | Not Translated (0%) | A section of the US Department of Commerce responsible for ensuring that trade sanctions are properly understood, implemented, and enforced in the United States. | A section of the US Department of Commerce responsible for ensuring that trade sanctions are properly understood, implemented, and enforced in the United States. |
| 68945a7ce1ec-648c-4862-bc75-242b1b7c0a64 | Not Translated (0%) | Among other tasks, the BIS regulates the import and export of sensitive, dual-use, and controlled goods and materials. | Among other tasks, the BIS regulates the import and export of sensitive, dual-use, and controlled goods and materials. |
| 68955a7ce1ec-648c-4862-bc75-242b1b7c0a64 | Not Translated (0%) | The mission statement of the BIS is: | The mission statement of the BIS is: |
| 68965a7ce1ec-648c-4862-bc75-242b1b7c0a64 | Not Translated (0%) | “Advance US national security, foreign policy, and economic objectives by ensuring an effective export control and treaty compliance system and promoting continued US strategic technology leadership.” | “Advance US national security, foreign policy, and economic objectives by ensuring an effective export control and treaty compliance system and promoting continued US strategic technology leadership.” |
| 68970943b57e-9305-42a0-8fdd-5676991901c3 | Not Translated (0%) | Compliance | Compliance |
| 6898133ea096-ac48-4944-b6a9-c0d118cb5d15 | Not Translated (0%) | An action or state of adhering to a set of legislation, regulations, rules, policy, specifications, or understood norms. | An action or state of adhering to a set of legislation, regulations, rules, policy, specifications, or understood norms. |
| 68995193902e-51fd-455d-8992-213b3628c7c1 | Not Translated (0%) | Comprehensive sanctions | Comprehensive sanctions |
| 6900ebbe1ad6-9df4-41c0-ba13-eb5da0f907e6 | Not Translated (0%) | Sanctions that prohibit all transactions and activity with a sanctioned country by the sanctioning country except in rare, specific instances. | Sanctions that prohibit all transactions and activity with a sanctioned country by the sanctioning country except in rare, specific instances. |
| 690151252a2e-eb78-4baf-93d0-63daf957e1df | Not Translated (0%) | Consolidation of goods | Consolidation of goods |
| 69027d8105cf-fa31-4bca-8174-c984ff0d2a4f | Not Translated (0%) | A method of sanctions evasion in which a person or organization either groups small shipments into one larger shipment or mixes restricted items in with other goods and does not declare those restricted items in shipping documentation. | A method of sanctions evasion in which a person or organization either groups small shipments into one larger shipment or mixes restricted items in with other goods and does not declare those restricted items in shipping documentation. |
| 6903754fa2fb-0cdf-4fc2-b50d-dff00be1b219 | Not Translated (0%) | Control effectiveness | Control effectiveness |
| 69040fdac313-4eff-49b7-94a0-e86f277e30aa | Not Translated (0%) | The measurement of the quality of controls used to mitigate a business’ inherent risks (also referred to as mitigation measures or quality of risk management). | The measurement of the quality of controls used to mitigate a business’ inherent risks (also referred to as mitigation measures or quality of risk management). |
| 69050fdac313-4eff-49b7-94a0-e86f277e30aa | Not Translated (0%) | These controls should be both appropriate and effective to mitigate the identified sanctions risks. | These controls should be both appropriate and effective to mitigate the identified sanctions risks. |
| 69060fdac313-4eff-49b7-94a0-e86f277e30aa | Not Translated (0%) | That is, they must be proportionate. | That is, they must be proportionate. |
| 69070fdac313-4eff-49b7-94a0-e86f277e30aa | Not Translated (0%) | Where there is an elevated risk, the controls should be more comprehensive to mitigate that risk. | Where there is an elevated risk, the controls should be more comprehensive to mitigate that risk. |
| 6908183d02d7-0f78-4d98-b0d7-516ad3c0d93f | Not Translated (0%) | Correspondent banking | Correspondent banking |
| 690909953227-519d-4c4d-a363-1c6ced3eddcc | Not Translated (0%) | The provision of banking services by one bank (the correspondent bank) to another bank (the respondent bank). | The provision of banking services by one bank (the correspondent bank) to another bank (the respondent bank). |
| 691009953227-519d-4c4d-a363-1c6ced3eddcc | Not Translated (0%) | Large international banks typically act as correspondents for hundreds of other banks around the world. | Large international banks typically act as correspondents for hundreds of other banks around the world. |
| 691109953227-519d-4c4d-a363-1c6ced3eddcc | Not Translated (0%) | Respondent banks may be provided with a wide range of services, including cash management (e.g., interest-bearing accounts in a variety of currencies), international wire transfers of funds, check clearing services, payable-through accounts, and foreign exchange services. | Respondent banks may be provided with a wide range of services, including cash management (e.g., interest-bearing accounts in a variety of currencies), international wire transfers of funds, check clearing services, payable-through accounts, and foreign exchange services. |
| 691266a517df-4c21-416a-82d5-e43a4391d7fb | Not Translated (0%) | Counterparty | Counterparty |
| 69136efda5cf-164a-40a4-934b-23cbfab74c37 | Not Translated (0%) | The other side of a transaction—the seller where one’s customer is the buyer, or vice versa. | The other side of a transaction—the seller where one’s customer is the buyer, or vice versa. |
| 6914646d12b4-abf9-403b-bd72-bc835fab6e4c | Not Translated (0%) | Cross border | Cross border |
| 691514add22b-9633-496e-aa7d-8c681bdfe9db | Not Translated (0%) | Used in the context of activities that involve at least two countries, for example, when wiring money from one country to another or taking currency across a border. | Used in the context of activities that involve at least two countries, for example, when wiring money from one country to another or taking currency across a border. |
| 69161f5b6dbb-e9be-489f-8d5d-3ebd52fb14dc | Not Translated (0%) | Customer due diligence (CDD) | Customer due diligence (CDD) |
| 6917386b12ac-07f7-408b-b47f-346b48fe10c5 | Not Translated (0%) | A set of internal controls that enable a financial institution to establish a customer’s identity, predict with relative certainty the types of transactions in which the customer is likely to engage, and assess the extent to which the customer exposes it to a range of risks (i.e., money laundering and sanctions). | A set of internal controls that enable a financial institution to establish a customer’s identity, predict with relative certainty the types of transactions in which the customer is likely to engage, and assess the extent to which the customer exposes it to a range of risks (i.e., money laundering and sanctions). |
| 6918386b12ac-07f7-408b-b47f-346b48fe10c5 | Not Translated (0%) | Organizations also need to know their customers through CDD to guard against fraud and comply with the requirements of relevant legislation and regulation. | Organizations also need to know their customers through CDD to guard against fraud and comply with the requirements of relevant legislation and regulation. |
| 6919386b12ac-07f7-408b-b47f-346b48fe10c5 | Not Translated (0%) | Effective CDD programs also help to protect banks’ reputation and the integrity of banking systems by reducing the likelihood of banks becoming a vehicle for or a victim of financial crime. | Effective CDD programs also help to protect banks’ reputation and the integrity of banking systems by reducing the likelihood of banks becoming a vehicle for or a victim of financial crime. |
| 6920386b12ac-07f7-408b-b47f-346b48fe10c5 | Not Translated (0%) | As such, they constitute an essential part of sound risk management. | As such, they constitute an essential part of sound risk management. |
| 69210df43caf-fbb4-41b5-aea5-eac85c6e6cc2 | Not Translated (0%) | Customer relationship | Customer relationship |
| 6922726cb801-513d-4022-bbba-bf0bf144b5da | Not Translated (0%) | The primary defense against sanctions evasion. | The primary defense against sanctions evasion. |
| 6923726cb801-513d-4022-bbba-bf0bf144b5da | Not Translated (0%) | A customer relationship encompasses any and all contact with a prospective customer. | A customer relationship encompasses any and all contact with a prospective customer. |
| 6924726cb801-513d-4022-bbba-bf0bf144b5da | Not Translated (0%) | This includes dialogue that takes place during onboarding and conversations that occur as the customer uses the financial institution’s products and services. | This includes dialogue that takes place during onboarding and conversations that occur as the customer uses the financial institution’s products and services. |
| 6925726cb801-513d-4022-bbba-bf0bf144b5da | Not Translated (0%) | People in the financial institution’s management, marketing, operations, and compliance departments may take part in this communication. | People in the financial institution’s management, marketing, operations, and compliance departments may take part in this communication. |
| 6926dab71657-3d20-426b-83d1-41c9fd7411a4 | Not Translated (0%) | Database, third-party | Database, third-party |
| 69272d1c1e7c-b765-4db1-85bf-31e259392356 | Not Translated (0%) | Third-party databases can be a good source of both primary and secondary information sources. | Third-party databases can be a good source of both primary and secondary information sources. |
| 69282d1c1e7c-b765-4db1-85bf-31e259392356 | Not Translated (0%) | Examples of third-party databases include rating agencies, stock exchanges, and legal databases. | Examples of third-party databases include rating agencies, stock exchanges, and legal databases. |
| 69292d1c1e7c-b765-4db1-85bf-31e259392356 | Not Translated (0%) | The information provided by third-party databases can be helpful but should never stand on its own. | The information provided by third-party databases can be helpful but should never stand on its own. |
| 6930109a2639-7de7-42c6-b502-94be7bdcca4a | Not Translated (0%) | Dealing in funds | Dealing in funds |
| 6931960e69d5-76d6-4ced-89e6-67aa20e6c946 | Not Translated (0%) | The practice, which must be avoided, of a financial institution moving, transferring, altering, using, or accessing funds it has frozen. | The practice, which must be avoided, of a financial institution moving, transferring, altering, using, or accessing funds it has frozen. |
| 6932960e69d5-76d6-4ced-89e6-67aa20e6c946 | Not Translated (0%) | Dealing in funds also includes interacting with funds in any way that would result in any change to their volume, amount, location, ownership, possession, character, or destination, or any change that would enable the funds to be used, including portfolio management. | Dealing in funds also includes interacting with funds in any way that would result in any change to their volume, amount, location, ownership, possession, character, or destination, or any change that would enable the funds to be used, including portfolio management. |
| 6933960e69d5-76d6-4ced-89e6-67aa20e6c946 | Not Translated (0%) | Asset-freezing restrictions require that the frozen assets must be segregated. | Asset-freezing restrictions require that the frozen assets must be segregated. |
| 693475f571a4-03c9-4e9f-94f5-65dab00d0c5e | Not Translated (0%) | Decision tree | Decision tree |
| 6935210b1806-a7f1-48b7-8a85-aac690f5bf50 | Not Translated (0%) | Five-question process for determining which alerts can reasonably be discounted, and which others warrant an investigation. | Five-question process for determining which alerts can reasonably be discounted, and which others warrant an investigation. |
| 693630332200-5e54-4974-a718-d7450fa1170d | Not Translated (0%) | Delisting | Delisting |
| 69378e9512aa-daf2-4acb-a2e9-d0cac94831e6 | Not Translated (0%) | The process of removing a sanctions target from a list after the restrictions imposed on them have been removed. | The process of removing a sanctions target from a list after the restrictions imposed on them have been removed. |
| 6938b0c5b219-bbcb-4acc-b90e-30f0da155c5c | Not Translated (0%) | Delivery channels | Delivery channels |
| 6939c18d0a5a-75bc-479b-8600-32894380b0d8 | Not Translated (0%) | The ways in which products and services are provided by a firm to its customer (also referred to as servicing methods and distribution channels). | The ways in which products and services are provided by a firm to its customer (also referred to as servicing methods and distribution channels). |
| 6940c18d0a5a-75bc-479b-8600-32894380b0d8 | Not Translated (0%) | For example, reliance upon brokers, intermediaries, and other independent third parties poses a higher sanctions risk than when a business interacts directly with customers and suppliers. | For example, reliance upon brokers, intermediaries, and other independent third parties poses a higher sanctions risk than when a business interacts directly with customers and suppliers. |
| 6941c18d0a5a-75bc-479b-8600-32894380b0d8 | Not Translated (0%) | The absence of face-to-face onboarding presents a higher risk than when customers are onboarded directly or through a domestic affiliate. | The absence of face-to-face onboarding presents a higher risk than when customers are onboarded directly or through a domestic affiliate. |
| 6942c18d0a5a-75bc-479b-8600-32894380b0d8 | Not Translated (0%) | Other delivery channels without face-to-face onboarding, such as internet banking and money services businesses, are also considered to pose a higher inherent sanctions risk. | Other delivery channels without face-to-face onboarding, such as internet banking and money services businesses, are also considered to pose a higher inherent sanctions risk. |
| 6943c18d0a5a-75bc-479b-8600-32894380b0d8 | Not Translated (0%) | A delivery channel that processes payments quickly is also a higher risk. | A delivery channel that processes payments quickly is also a higher risk. |
| 6944bd052fef-eed9-4222-9385-d1fe7ef2c788 | Not Translated (0%) | Denied Persons List (DPL) | Denied Persons List (DPL) |
| 694544cc8f7f-b792-4cce-887c-87d9b0b250eb | Not Translated (0%) | A list, published by BIS, of individuals, entities, or companies that have been denied export privileges, most commonly because they have violated the Export Administration Act. | A list, published by BIS, of individuals, entities, or companies that have been denied export privileges, most commonly because they have violated the Export Administration Act. |
| 694644cc8f7f-b792-4cce-887c-87d9b0b250eb | Not Translated (0%) | American companies and individuals are forbidden from entering any export dealings with any person or entity on the DPL. | American companies and individuals are forbidden from entering any export dealings with any person or entity on the DPL. |
| 694760e8bc75-7aee-4cc4-9a89-dea8f1719393 | Not Translated (0%) | Dilution of sanctioned ownership | Dilution of sanctioned ownership |
| 694897cf148c-18be-4395-a569-4e18141efd0e | Not Translated (0%) | Complex ownership structures involving multiple entities in different jurisdictions can reduce the percentage of a business that is owned by a sanctioned party so that it falls below thresholds which would prevent trade. | Complex ownership structures involving multiple entities in different jurisdictions can reduce the percentage of a business that is owned by a sanctioned party so that it falls below thresholds which would prevent trade. |
| 694997cf148c-18be-4395-a569-4e18141efd0e | Not Translated (0%) | This dilution allows a sanctioned country or entity to avoid the restrictions the sanctions create. | This dilution allows a sanctioned country or entity to avoid the restrictions the sanctions create. |
| 695036578212-8275-46d2-85b5-d7572844a1ca | Not Translated (0%) | Dollar clearing | Dollar clearing |
| 6951ab8c5e13-3e62-4038-b9f1-d90e8774b505 | Not Translated (0%) | The process of converting clients’ payments from a foreign currency into US dollars. | The process of converting clients’ payments from a foreign currency into US dollars. |
| 695218258611-6cc9-43dc-ab77-e651e7dbbeb8 | Not Translated (0%) | Dual control | Dual control |
| 69531e5e63fd-9460-4928-bc9d-640f7e81b973 | Not Translated (0%) | A principle whereby at least two employees are required in order to complete an internal control task. | A principle whereby at least two employees are required in order to complete an internal control task. |
| 69541e5e63fd-9460-4928-bc9d-640f7e81b973 | Not Translated (0%) | The purpose of dual control is to protect against internal fraud and prevent internal control failure at a single point. | The purpose of dual control is to protect against internal fraud and prevent internal control failure at a single point. |
| 69551e5e63fd-9460-4928-bc9d-640f7e81b973 | Not Translated (0%) | Also referred to as “maker-checker” or “four-eyes.” | Also referred to as “maker-checker” or “four-eyes.” |
| 6956d64ce344-5a5b-45bd-972e-ec583fbb242d | Not Translated (0%) | Dual-use goods | Dual-use goods |
| 6957e2f41ac1-2f2d-4164-a765-34b9df74c214 | Not Translated (0%) | The products or technology that can be used for either military or civilian purposes. | The products or technology that can be used for either military or civilian purposes. |
| 6958e2f41ac1-2f2d-4164-a765-34b9df74c214 | Not Translated (0%) | Most often, in diplomatic and political platforms, these are goods that can serve multiple uses at one time. | Most often, in diplomatic and political platforms, these are goods that can serve multiple uses at one time. |
| 6959e2f41ac1-2f2d-4164-a765-34b9df74c214 | Not Translated (0%) | An example is missile technology, which can be used for both scientific research and military action. | An example is missile technology, which can be used for both scientific research and military action. |
| 696074bbf759-63af-4c20-b653-db806a8b34ed | Not Translated (0%) | Due diligence | Due diligence |
| 6961365fc980-b0ec-4412-848c-6ad26822350c | Not Translated (0%) | The investigation and examination of a company or group, conducted in the process of preparing for a business transaction. | The investigation and examination of a company or group, conducted in the process of preparing for a business transaction. |
| 6962365fc980-b0ec-4412-848c-6ad26822350c | Not Translated (0%) | Due diligence should be completed before entering into any financial transaction or business relationship. | Due diligence should be completed before entering into any financial transaction or business relationship. |
| 69638aad9548-19a5-4eb8-b553-4ea818f0124c | Not Translated (0%) | Economic sanctions | Economic sanctions |
| 69641d8a408c-4b30-49d0-b44a-44ec9665033e | Not Translated (0%) | The imposition of trade or financial restrictions and penalties by one or more countries against another country, entity, or individual with the purpose of changing a behavior. | The imposition of trade or financial restrictions and penalties by one or more countries against another country, entity, or individual with the purpose of changing a behavior. |
| 69651d8a408c-4b30-49d0-b44a-44ec9665033e | Not Translated (0%) | Economic sanctions can include actions such as tariffs, trade restrictions, and financial limitations. | Economic sanctions can include actions such as tariffs, trade restrictions, and financial limitations. |
| 69661d6770ae-db5a-4421-8890-5f92f051ad03 | Not Translated (0%) | Electronic funds transfer (EFT) | Electronic funds transfer (EFT) |
| 696706beb673-0ceb-458c-8f5a-b9cdaa3be83c | Not Translated (0%) | The movement of funds between financial institutions electronically. | The movement of funds between financial institutions electronically. |
| 696806beb673-0ceb-458c-8f5a-b9cdaa3be83c | Not Translated (0%) | The two most common electronic funds transfer systems in the US are FedWire and CHIPS. | The two most common electronic funds transfer systems in the US are FedWire and CHIPS. |
| 696906beb673-0ceb-458c-8f5a-b9cdaa3be83c | Not Translated (0%) | (SWIFT is often referred to as the third EFT system, but in reality it is an international messaging system that carries instructions for wire transfers between institutions, rather than the wire transfer system itself.) | (SWIFT is often referred to as the third EFT system, but in reality it is an international messaging system that carries instructions for wire transfers between institutions, rather than the wire transfer system itself.) |
| 697073276e0a-3069-4d28-acff-7da7e2c8ff82 | Not Translated (0%) | Embargo | Embargo |
| 69712ce82963-eac7-446a-833e-1c557165f71e | Not Translated (0%) | An official government action to ban trade or commercial activity with a specific country, sometimes involving a specific trade product (e.g., a grain embargo or an oil embargo). | An official government action to ban trade or commercial activity with a specific country, sometimes involving a specific trade product (e.g., a grain embargo or an oil embargo). |
| 697216af89b6-fa80-4398-a472-22b3dd73611f | Not Translated (0%) | Embezzlement | Embezzlement |
| 69739f2cfc8c-7ee8-4f65-95e3-b5b50cf5a661 | Not Translated (0%) | The unlawful act of taking or misappropriating funds entrusted by an employer or organization for one’s own use. | The unlawful act of taking or misappropriating funds entrusted by an employer or organization for one’s own use. |
| 697415f149da-685f-45bf-b5a1-e82a328e5f0e | Not Translated (0%) | End-user certificate | End-user certificate |
| 6975049fa267-1d5a-497f-b6ea-eff63f6159d8 | Not Translated (0%) | A shipping document used to certify that a buyer is the final recipient of the materials and is not planning to transfer the materials to another party. | A shipping document used to certify that a buyer is the final recipient of the materials and is not planning to transfer the materials to another party. |
| 6976c3f76beb-dc61-4bc3-942b-9d32db85101d | Not Translated (0%) | Evasion | Evasion |
| 69773de31ab7-ad69-41f8-b6cc-f01e8e9894ab | Not Translated (0%) | The act of avoiding or circumventing sanctions to engage in prohibited activity without being caught. | The act of avoiding or circumventing sanctions to engage in prohibited activity without being caught. |
| 697864c7d34d-3085-4aab-81df-626418433c62 | Not Translated (0%) | Event-triggered monitoring | Event-triggered monitoring |
| 69794196c1ae-07ef-44ad-9f1e-c1b0d3abe640 | Not Translated (0%) | An internal control used to mitigate sanctions risks. | An internal control used to mitigate sanctions risks. |
| 69804196c1ae-07ef-44ad-9f1e-c1b0d3abe640 | Not Translated (0%) | Event-triggered monitoring occurs whenever relevant information about an existing customer (e.g., its jurisdiction of operation) changes, therefore requiring an interim review of information prior to a scheduled review. | Event-triggered monitoring occurs whenever relevant information about an existing customer (e.g., its jurisdiction of operation) changes, therefore requiring an interim review of information prior to a scheduled review. |
| 6981d02fff59-7824-4c90-ba2b-5e7af697cf0c | Not Translated (0%) | Exclusions list | Exclusions list |
| 6982b0517ceb-3d16-478c-9c71-cb8f989b1c37 | Not Translated (0%) | A list of names that are excluded from the screening process. | A list of names that are excluded from the screening process. |
| 6983b0517ceb-3d16-478c-9c71-cb8f989b1c37 | Not Translated (0%) | These are names that the compliance team has verified do not actually match a name on a sanctions list. | These are names that the compliance team has verified do not actually match a name on a sanctions list. |
| 69845bd0cfb4-0129-46e1-bd54-b3e3a8a97bc2 | Not Translated (0%) | Exemption | Exemption |
| 6985d9ed9541-58a2-453c-8925-ed5132dba12f | Not Translated (0%) | See license | See license |
| 698644d07db0-f648-4d8f-b8c4-ad1e68ae10e8 | Not Translated (0%) | Export Administration Regulations (EAR) | Export Administration Regulations (EAR) |
| 698743b773fa-aa03-4da5-9a51-c8e14d6c1687 | Not Translated (0%) | A set of regulations administered and enforced by the Bureau of Industry and Security, a division of the US Department of Commerce. | A set of regulations administered and enforced by the Bureau of Industry and Security, a division of the US Department of Commerce. |
| 698843b773fa-aa03-4da5-9a51-c8e14d6c1687 | Not Translated (0%) | They apply specifically to physical goods or commodities such as technology, software, and other items subject to export controls. | They apply specifically to physical goods or commodities such as technology, software, and other items subject to export controls. |
| 6989b162809e-6af2-425d-9b69-51c96d1808cd | Not Translated (0%) | Export Control Joint Unit (ECJU) | Export Control Joint Unit (ECJU) |
| 69905cd05e15-d313-4abf-8d21-90f484182875 | Not Translated (0%) | A UK–based agency responsible for administering licenses for export controlled goods (military and dual-use) that might otherwise be involved in an embargo. | A UK–based agency responsible for administering licenses for export controlled goods (military and dual-use) that might otherwise be involved in an embargo. |
| 6991b58b7e85-bcfe-454d-8cd5-e7122b877cec | Not Translated (0%) | External evasion | External evasion |
| 69927fefb8c2-c5c1-41df-979b-5df26704b7f5 | Not Translated (0%) | When a customer or its third party violates sanctions without the cooperation or knowledge of internal staff. | When a customer or its third party violates sanctions without the cooperation or knowledge of internal staff. |
| 6993b43832f0-8f8b-460a-9b52-d1d493ff105d | Not Translated (0%) | Extraterritorial jurisdiction | Extraterritorial jurisdiction |
| 69940d5760ce-11e7-4e83-ba53-d2737dc854cf | Not Translated (0%) | A state making, applying, and enforcing laws, regulations, and other rules of conduct in respect to persons, property, or activity beyond its territory. | A state making, applying, and enforcing laws, regulations, and other rules of conduct in respect to persons, property, or activity beyond its territory. |
| 69950d5760ce-11e7-4e83-ba53-d2737dc854cf | Not Translated (0%) | The US is the primary government engaged in applying extraterritoriality to its sanctions regime. | The US is the primary government engaged in applying extraterritoriality to its sanctions regime. |
| 69960d5760ce-11e7-4e83-ba53-d2737dc854cf | Not Translated (0%) | The EU, believing that the practice of extraterritoriality violates international law, does not allow for the concept of extraterritoriality in relation to the sanctions restrictions it imposes. | The EU, believing that the practice of extraterritoriality violates international law, does not allow for the concept of extraterritoriality in relation to the sanctions restrictions it imposes. |
| 6997bd9345b3-476b-42e7-9cdc-92d3d24fc86d | Not Translated (0%) | Facilitation | Facilitation |
| 69985065978f-e668-48ee-bfbb-dd7eeef42a72 | Not Translated (0%) | Actions taken by one person to assist or support another person in engaging in activity. | Actions taken by one person to assist or support another person in engaging in activity. |
| 69995065978f-e668-48ee-bfbb-dd7eeef42a72 | Not Translated (0%) | Within a sanctions context, facilitation means when one person (person A) who is not allowed to engage in an activity either directly or indirectly assists or supports another person (person B) to engage in that activity. | Within a sanctions context, facilitation means when one person (person A) who is not allowed to engage in an activity either directly or indirectly assists or supports another person (person B) to engage in that activity. |
| 70005065978f-e668-48ee-bfbb-dd7eeef42a72 | Not Translated (0%) | The activity does not necessarily need to be prohibited for person B, but only for person A. | The activity does not necessarily need to be prohibited for person B, but only for person A. |
| 7001ae138dae-7260-4e3d-9b3c-33cb3fe1e6bf | Not Translated (0%) | False negative | False negative |
| 7002dc44fd7a-ec0f-41ee-831e-8818b447fedb | Not Translated (0%) | Either (1) a hit that is identified during the screening process as a possible alert, but is dismissed, when in fact there is a match to a target named on a sanctions list; or (2) screened activity that would have generated a hit if the screening process had been calibrated to catch such activity, such as a target match that is unidentified because thresholds are too high. | Either (1) a hit that is identified during the screening process as a possible alert, but is dismissed, when in fact there is a match to a target named on a sanctions list; or (2) screened activity that would have generated a hit if the screening process had been calibrated to catch such activity, such as a target match that is unidentified because thresholds are too high. |
| 70039bb8576c-3417-493c-a26d-876a0acddc99 | Not Translated (0%) | False positive | False positive |
| 70045171cf10-28d9-4c31-a4a0-f00099c8cea8 | Not Translated (0%) | A hit identified during the screening process as a possible alert, but when reviewed, is found not to be a match to a target named on a sanctions list. | A hit identified during the screening process as a possible alert, but when reviewed, is found not to be a match to a target named on a sanctions list. |
| 70051f3e5c18-6894-46c8-a610-f9a1d101d67a | Not Translated (0%) | Final Rule Part 504 | Final Rule Part 504 |
| 70069de81721-54b0-4b38-bf57-48b643d7c55f | Not Translated (0%) | Regulations issued by the New York State Department of Financial Services (DFS) on June 30, 2016, to emphasize the need for sound transaction monitoring and filtering programs (TMPs). | Regulations issued by the New York State Department of Financial Services (DFS) on June 30, 2016, to emphasize the need for sound transaction monitoring and filtering programs (TMPs). |
| 70079de81721-54b0-4b38-bf57-48b643d7c55f | Not Translated (0%) | The Rule went into effect on January 1, 2017, requiring regulated institutions to maintain TMPs reasonably designed to monitor transactions after their execution for compliance with the Bank Secrecy Act and AML laws and regulations and prior to their execution for compliance with the US treasury department’s Office of Foreign Assets Control (OFAC). | The Rule went into effect on January 1, 2017, requiring regulated institutions to maintain TMPs reasonably designed to monitor transactions after their execution for compliance with the Bank Secrecy Act and AML laws and regulations and prior to their execution for compliance with the US treasury department’s Office of Foreign Assets Control (OFAC). |
| 70089de81721-54b0-4b38-bf57-48b643d7c55f | Not Translated (0%) | The regulation includes suspicious activity reporting requirements and prevention of unlawful transactions with targets of economic sanctions administered by OFAC. | The regulation includes suspicious activity reporting requirements and prevention of unlawful transactions with targets of economic sanctions administered by OFAC. |
| 700906ccf7d7-3258-48b8-a25d-101b78c7a628 | Not Translated (0%) | Financial Action Task Force (FATF) | Financial Action Task Force (FATF) |
| 7010856c79f8-0737-40c3-aa0f-742af84753b5 | Not Translated (0%) | FATF was chartered in 1989 by the Group of Seven industrial nations to foster the establishment of national and global measures to combat money laundering. | FATF was chartered in 1989 by the Group of Seven industrial nations to foster the establishment of national and global measures to combat money laundering. |
| 7011856c79f8-0737-40c3-aa0f-742af84753b5 | Not Translated (0%) | It is an international policy-making body that sets anti-money laundering standards and counterterrorist financing measures worldwide. | It is an international policy-making body that sets anti-money laundering standards and counterterrorist financing measures worldwide. |
| 7012856c79f8-0737-40c3-aa0f-742af84753b5 | Not Translated (0%) | Its recommendations do not have the force of law. | Its recommendations do not have the force of law. |
| 7013856c79f8-0737-40c3-aa0f-742af84753b5 | Not Translated (0%) | Thirty-five countries and two international organizations are members. | Thirty-five countries and two international organizations are members. |
| 7014856c79f8-0737-40c3-aa0f-742af84753b5 | Not Translated (0%) | In 2012, FATF substantially revised its 40+9 Recommendations and reduced them to 40. | In 2012, FATF substantially revised its 40+9 Recommendations and reduced them to 40. |
| 7015856c79f8-0737-40c3-aa0f-742af84753b5 | Not Translated (0%) | FATF develops annual typology reports showcasing current money laundering and terrorist financing trends and methods. | FATF develops annual typology reports showcasing current money laundering and terrorist financing trends and methods. |
| 7016fb9477f0-19c0-4283-a64e-f5ddf8d7dd3e | Not Translated (0%) | Financial Crimes Enforcement Network (FinCEN) | Financial Crimes Enforcement Network (FinCEN) |
| 7017d94585ea-c00a-49b3-8fb2-52176dadb11a | Not Translated (0%) | A bureau of the United States Department of the Treasury that collects and analyzes information about financial transactions in order to combat domestic and international money laundering, terrorist financing, and other financial crimes. | A bureau of the United States Department of the Treasury that collects and analyzes information about financial transactions in order to combat domestic and international money laundering, terrorist financing, and other financial crimes. |
| 701811ad2ada-6f8b-4870-879d-be4548715a05 | Not Translated (0%) | First line of defense | First line of defense |
| 7019e9f3187d-9aba-48f9-a20a-e55eef7a4127 | Not Translated (0%) | Within the governance structure of a sanctions compliance program, the first line of defense (also referred to as the “front line”) includes relationship managers and other customer-facing employees who are closest to the customers and counterparties during the onboarding and contracting phase of relationships. | Within the governance structure of a sanctions compliance program, the first line of defense (also referred to as the “front line”) includes relationship managers and other customer-facing employees who are closest to the customers and counterparties during the onboarding and contracting phase of relationships. |
| 7020e9f3187d-9aba-48f9-a20a-e55eef7a4127 | Not Translated (0%) | The first-line defense is responsible for ensuring that adequate information is obtained so that effective screening of customers and their owners and controllers can be performed. | The first-line defense is responsible for ensuring that adequate information is obtained so that effective screening of customers and their owners and controllers can be performed. |
| 7021e9f3187d-9aba-48f9-a20a-e55eef7a4127 | Not Translated (0%) | In general, the first-line defense owns and manages the collection of SDD information. | In general, the first-line defense owns and manages the collection of SDD information. |
| 7022933d9047-568a-46f8-8869-68fd13c31749 | Not Translated (0%) | Foreign sanctions evader (FSE) | Foreign sanctions evader (FSE) |
| 7023d2fcfa4e-99b9-4a3b-b6a3-5abea8db14b8 | Not Translated (0%) | A foreign individual or entity determined to have violated, attempted to violate, conspired to violate, or caused a violation of US sanctions. | A foreign individual or entity determined to have violated, attempted to violate, conspired to violate, or caused a violation of US sanctions. |
| 7024d2fcfa4e-99b9-4a3b-b6a3-5abea8db14b8 | Not Translated (0%) | OFAC publishes a list of FSEs, and transactions by US persons or within the United States involving FSEs are prohibited. | OFAC publishes a list of FSEs, and transactions by US persons or within the United States involving FSEs are prohibited. |
| 7025d519288d-64d0-4b4e-b824-281c3bf412bb | Not Translated (0%) | Free trade zone (FTZ) | Free trade zone (FTZ) |
| 7026eac7a5c3-b83d-4ca9-a7bd-120642706d3b | Not Translated (0%) | Also known as special economic zones, FTZs are delimited geographic areas within a country with zone management that provides infrastructure and services to tenant companies. | Also known as special economic zones, FTZs are delimited geographic areas within a country with zone management that provides infrastructure and services to tenant companies. |
| 7027eac7a5c3-b83d-4ca9-a7bd-120642706d3b | Not Translated (0%) | In FTZs, the rules for doing business are different and promoted by a set of policy instruments that are not generally applicable to the rest of the country. | In FTZs, the rules for doing business are different and promoted by a set of policy instruments that are not generally applicable to the rest of the country. |
| 7028eac7a5c3-b83d-4ca9-a7bd-120642706d3b | Not Translated (0%) | FTZs constitute a key risk area specific to trade-related activities because they commonly have inadequate sanctions safeguards; minimal oversight by local authorities; weak procedures to inspect goods and legal entities, including appropriate record-keeping and information technology systems; and lack of cooperation between FTZs and local customs authorities. | FTZs constitute a key risk area specific to trade-related activities because they commonly have inadequate sanctions safeguards; minimal oversight by local authorities; weak procedures to inspect goods and legal entities, including appropriate record-keeping and information technology systems; and lack of cooperation between FTZs and local customs authorities. |
| 7029ca9a68f6-c3e1-4022-92d8-be70ac7e5feb | Not Translated (0%) | Front company | Front company |
| 70301ed54e62-fe68-4e6a-a49b-f599aabcd98f | Not Translated (0%) | Any business set up and controlled by another organization. | Any business set up and controlled by another organization. |
| 70311ed54e62-fe68-4e6a-a49b-f599aabcd98f | Not Translated (0%) | While front companies are not necessarily illicit, criminals use them to launder money by giving the funds the appearance of legitimate origin. | While front companies are not necessarily illicit, criminals use them to launder money by giving the funds the appearance of legitimate origin. |
| 70321ed54e62-fe68-4e6a-a49b-f599aabcd98f | Not Translated (0%) | Front companies may subsidize products and services at levels well below market rates or even below manufacturing costs. | Front companies may subsidize products and services at levels well below market rates or even below manufacturing costs. |
| 70339c979357-8fa8-4c94-bbc0-d881601feeca | Not Translated (0%) | Fuzzy logic | Fuzzy logic |
| 70345594c295-46e1-47b2-bebf-587296b88b8a | Not Translated (0%) | A matching technique used by financial institutions to increase the effectiveness of the screening processes by overcoming problems such as flawed records and databases. | A matching technique used by financial institutions to increase the effectiveness of the screening processes by overcoming problems such as flawed records and databases. |
| 70355594c295-46e1-47b2-bebf-587296b88b8a | Not Translated (0%) | Fuzzy logic is accomplished through algorithms that use “degrees of similarity” to determine the probability that two names are the same. | Fuzzy logic is accomplished through algorithms that use “degrees of similarity” to determine the probability that two names are the same. |
| 70365594c295-46e1-47b2-bebf-587296b88b8a | Not Translated (0%) | Fuzzy logic can find matches in misspelled names, incomplete names, and names with different spellings but similar sounds or phonetics. | Fuzzy logic can find matches in misspelled names, incomplete names, and names with different spellings but similar sounds or phonetics. |
| 70375594c295-46e1-47b2-bebf-587296b88b8a | Not Translated (0%) | In addition, fuzzy logic accepts different formats for date of birth and other inconsistencies. | In addition, fuzzy logic accepts different formats for date of birth and other inconsistencies. |
| 70385594c295-46e1-47b2-bebf-587296b88b8a | Not Translated (0%) | Although fuzzy logic increases the likelihood of identifying potential target matches, it can also increase the number of false positives. | Although fuzzy logic increases the likelihood of identifying potential target matches, it can also increase the number of false positives. |
| 7039e85edc38-81a8-4881-a719-ec9e82f32420 | Not Translated (0%) | Globalization | Globalization |
| 7040b1c654ba-87e4-480f-b618-a005495cf0b3 | Not Translated (0%) | Globalization refers to the integrating of national economic, trade, and communication operations by businesses engaging in international trade. | Globalization refers to the integrating of national economic, trade, and communication operations by businesses engaging in international trade. |
| 7041b1c654ba-87e4-480f-b618-a005495cf0b3 | Not Translated (0%) | Globalization generally includes the enlarging of national perspectives to international and interdependent perspectives of society. | Globalization generally includes the enlarging of national perspectives to international and interdependent perspectives of society. |
| 7042b1c654ba-87e4-480f-b618-a005495cf0b3 | Not Translated (0%) | It advocates a freer transfer of goods and services, as well as assets, across national and international boundaries. | It advocates a freer transfer of goods and services, as well as assets, across national and international boundaries. |
| 7043b1c654ba-87e4-480f-b618-a005495cf0b3 | Not Translated (0%) | It is believed that globalization may limit the effectiveness of sanctions because a globalized market makes it easier to replace and reroute trade channels. | It is believed that globalization may limit the effectiveness of sanctions because a globalized market makes it easier to replace and reroute trade channels. |
| 7044c088a407-55da-4726-8bfc-ee103ed8d83e | Not Translated (0%) | Governance | Governance |
| 704526101552-8df8-418a-92d3-b60468760735 | Not Translated (0%) | Governance is the allocation of power and decision-making authority among the board of directors and management to establish internal controls for the purposes of managing risk and compliance with laws, regulations, and internal policies. | Governance is the allocation of power and decision-making authority among the board of directors and management to establish internal controls for the purposes of managing risk and compliance with laws, regulations, and internal policies. |
| 704626101552-8df8-418a-92d3-b60468760735 | Not Translated (0%) | Governance may include systems of checks and balances and a responsibility for leadership and organization. | Governance may include systems of checks and balances and a responsibility for leadership and organization. |
| 7047af33ffb7-d33f-4831-9b70-5440d9d9ff9a | Not Translated (0%) | Greylist | Greylist |
| 70480d868115-bd27-4e11-a71e-b2cce10d0e04 | Not Translated (0%) | A greylist is a list of entities that are suspicious or higher-risk for causing a negative impact to a firm. | A greylist is a list of entities that are suspicious or higher-risk for causing a negative impact to a firm. |
| 70490d868115-bd27-4e11-a71e-b2cce10d0e04 | Not Translated (0%) | Within the context of sanctions, the greylist includes the names of countries with strategic deficiencies in anti-money laundering and counterterrorism financing regimes. | Within the context of sanctions, the greylist includes the names of countries with strategic deficiencies in anti-money laundering and counterterrorism financing regimes. |
| 70500d868115-bd27-4e11-a71e-b2cce10d0e04 | Not Translated (0%) | Moreover, these countries have also not made sufficient progress or otherwise committed to action plans to address deficiencies identified by FATF. | Moreover, these countries have also not made sufficient progress or otherwise committed to action plans to address deficiencies identified by FATF. |
| 7051a9dc0e19-689a-4b63-a086-825eaaee0fe0 | Not Translated (0%) | Hit | Hit |
| 7052cfa246f1-d6c4-4b77-851f-16053bc62100 | Not Translated (0%) | A potential match or name match during the sanctions screening process that indicates a possible sanctioned person. | A potential match or name match during the sanctions screening process that indicates a possible sanctioned person. |
| 705388b36099-7894-473d-8c1d-fc84103f488c | Not Translated (0%) | Human rights | Human rights |
| 7054384626e4-2f70-458b-bd57-fd7c7ba42da9 | Not Translated (0%) | The fundamental rights of humans which are conceived to be “inherent to all human beings regardless of race, sex, nationality, ethnicity, language, religion, or any other status.” | The fundamental rights of humans which are conceived to be “inherent to all human beings regardless of race, sex, nationality, ethnicity, language, religion, or any other status.” |
| 7055384626e4-2f70-458b-bd57-fd7c7ba42da9 | Not Translated (0%) | Human rights are considered irrepressible by government. | Human rights are considered irrepressible by government. |
| 7056384626e4-2f70-458b-bd57-fd7c7ba42da9 | Not Translated (0%) | The UN Universal Declaration of Human Rights was adopted in 1948 to protect the social, cultural, financial, and political rights of individuals. | The UN Universal Declaration of Human Rights was adopted in 1948 to protect the social, cultural, financial, and political rights of individuals. |
| 7057384626e4-2f70-458b-bd57-fd7c7ba42da9 | Not Translated (0%) | Among the human rights covered by the declaration are the right to life, liberty, education, and equality under law. | Among the human rights covered by the declaration are the right to life, liberty, education, and equality under law. |
| 7058384626e4-2f70-458b-bd57-fd7c7ba42da9 | Not Translated (0%) | The declaration also sets human protections that are the basis of many modern national constitutions, such as the freedom to assemble and the right to free speech, to religious freedoms, and to other liberties. | The declaration also sets human protections that are the basis of many modern national constitutions, such as the freedom to assemble and the right to free speech, to religious freedoms, and to other liberties. |
| 7059384626e4-2f70-458b-bd57-fd7c7ba42da9 | Not Translated (0%) | No country is bound to abide by human rights standards, yet the standards serve as a guide for human independence, interest, and protection. | No country is bound to abide by human rights standards, yet the standards serve as a guide for human independence, interest, and protection. |
| 70602b1d1350-4e16-4974-9ea9-86f22391f15e | Not Translated (0%) | Identifier | Identifier |
| 706168f890a3-3810-49b8-9283-75825a871360 | Not Translated (0%) | Type of information about a sanctions target that is recorded on a sanctions list, for example, name, date of birth, jurisdiction, national identification number, entity with which a target is linked, information about penalties imposed against a target, registered legal address, and website URL. | Type of information about a sanctions target that is recorded on a sanctions list, for example, name, date of birth, jurisdiction, national identification number, entity with which a target is linked, information about penalties imposed against a target, registered legal address, and website URL. |
| 706268f890a3-3810-49b8-9283-75825a871360 | Not Translated (0%) | Identifiers apply to both individuals and legal entities. | Identifiers apply to both individuals and legal entities. |
| 7063d1e0e8a9-b8bf-47b3-b46d-93f05d0f47ea | Not Translated (0%) | Inequalities list | Inequalities list |
| 7064053b5c82-c6ef-4d4a-8eff-247f1f34369e | Not Translated (0%) | A list of words or names that automated screening tools often mistake as matches and thereby create potential matches to targets named on sanctions lists. | A list of words or names that automated screening tools often mistake as matches and thereby create potential matches to targets named on sanctions lists. |
| 7065053b5c82-c6ef-4d4a-8eff-247f1f34369e | Not Translated (0%) | These are words or names that the organization’s compliance team has checked and confirmed do not actually match up, such as Andrew and Andrea. | These are words or names that the organization’s compliance team has checked and confirmed do not actually match up, such as Andrew and Andrea. |
| 7066053b5c82-c6ef-4d4a-8eff-247f1f34369e | Not Translated (0%) | An addition to an inequalities list will apply the inequality to all future screened instances and decrease the likelihood of a future match. | An addition to an inequalities list will apply the inequality to all future screened instances and decrease the likelihood of a future match. |
| 7067053b5c82-c6ef-4d4a-8eff-247f1f34369e | Not Translated (0%) | Therefore, inequalities lists should have sufficient controls (at least dual controls) for additions to the list and periodic review. | Therefore, inequalities lists should have sufficient controls (at least dual controls) for additions to the list and periodic review. |
| 7068ea122819-bd3b-4d89-93fc-da30ca878059 | Not Translated (0%) | Inherent risk | Inherent risk |
| 7069dde8425d-db41-4b4d-8315-20f906ff5a8f | Not Translated (0%) | The level of sanctions risks that exists before controls are applied to mitigate them. | The level of sanctions risks that exists before controls are applied to mitigate them. |
| 7070dde8425d-db41-4b4d-8315-20f906ff5a8f | Not Translated (0%) | There are four main inherent risk categories: customers, products and services, countries, and delivery channels. | There are four main inherent risk categories: customers, products and services, countries, and delivery channels. |
| 7071dde8425d-db41-4b4d-8315-20f906ff5a8f | Not Translated (0%) | Inherent risk is linked to the risk assessment process, which evaluates the effectiveness of an institution’s risk controls. | Inherent risk is linked to the risk assessment process, which evaluates the effectiveness of an institution’s risk controls. |
| 7072dde8425d-db41-4b4d-8315-20f906ff5a8f | Not Translated (0%) | Inherent risk considers the likelihood and impact of noncompliance prior to considering any mitigating effects of risk management processes. | Inherent risk considers the likelihood and impact of noncompliance prior to considering any mitigating effects of risk management processes. |
| 7073e6ca3a64-b45b-49d5-8650-95ce502318f0 | Not Translated (0%) | Internal evasion | Internal evasion |
| 707455ae0411-5cf8-4413-a3a0-6d267a0487fd | Not Translated (0%) | When an organization’s own staff members commit or facilitate a sanctions violation. | When an organization’s own staff members commit or facilitate a sanctions violation. |
| 707555ae0411-5cf8-4413-a3a0-6d267a0487fd | Not Translated (0%) | Examples include the following: | Examples include the following: |
| 7076b9e35bed-941a-4aad-86f5-1ef81be52e38 | Not Translated (0%) | When a staff member either fails to apply or overrides internal controls to circumvent transaction monitoring tools | When a staff member either fails to apply or overrides internal controls to circumvent transaction monitoring tools |
| 7077367b87ce-0826-4cba-a0c5-3f7dc6759338 | Not Translated (0%) | When a staff member uses client accounts to conceal the origin of funds | When a staff member uses client accounts to conceal the origin of funds |
| 70783f3859d1-a509-420a-af78-ed9d4fc2a5d1 | Not Translated (0%) | Investigation | Investigation |
| 7079caacaf9f-c5ed-433b-a304-3cd3443f1a0f | Not Translated (0%) | The process of obtaining, evaluating, recording, and storing information about an individual or legal entity with whom one is conducting business, in response to an alert indicating a possible sanctions violation. | The process of obtaining, evaluating, recording, and storing information about an individual or legal entity with whom one is conducting business, in response to an alert indicating a possible sanctions violation. |
| 7080caacaf9f-c5ed-433b-a304-3cd3443f1a0f | Not Translated (0%) | Investigations often begin with simple checks before progressing to further investigation such as account review, customer outreach, and possible escalation to the compliance function. | Investigations often begin with simple checks before progressing to further investigation such as account review, customer outreach, and possible escalation to the compliance function. |
| 708130ff5ddf-a921-4915-8c10-39dfa6657ff1 | Not Translated (0%) | Isolation company | Isolation company |
| 7082dc3934c1-122d-4e44-a339-ac4fc0eef848 | Not Translated (0%) | A company that helps evaders avoid the appearance of involvement of either a sanctioned entity or an entity that is trying to do business with a sanctions target. | A company that helps evaders avoid the appearance of involvement of either a sanctioned entity or an entity that is trying to do business with a sanctions target. |
| 7083dc3934c1-122d-4e44-a339-ac4fc0eef848 | Not Translated (0%) | Evaders choose an isolation company either for its past business activities or its lack of traceable connection to the entities involved in the evasive activity. | Evaders choose an isolation company either for its past business activities or its lack of traceable connection to the entities involved in the evasive activity. |
| 70845fd87ce4-78c2-4594-a27f-74aa04b07e6f | Not Translated (0%) | Joint Comprehensive Plan of Action (JCPOA) | Joint Comprehensive Plan of Action (JCPOA) |
| 70852f40d459-c33e-4d7b-9ea3-1bc04fb01501 | Not Translated (0%) | A detailed agreement with five annexes reached by Iran and the P5+1 (China, France, Germany, Russia, the United Kingdom, and the United States) on July 14, 2015. | A detailed agreement with five annexes reached by Iran and the P5+1 (China, France, Germany, Russia, the United Kingdom, and the United States) on July 14, 2015. |
| 70862f40d459-c33e-4d7b-9ea3-1bc04fb01501 | Not Translated (0%) | The nuclear deal was endorsed by UN Security Council Resolution 2231, adopted on July 20, 2015. | The nuclear deal was endorsed by UN Security Council Resolution 2231, adopted on July 20, 2015. |
| 70872f40d459-c33e-4d7b-9ea3-1bc04fb01501 | Not Translated (0%) | Iran’s compliance with the nuclear-related provisions of the JCPOA is verified by the International Atomic Energy Agency (IAEA) according to certain requirements set forth in the agreement. | Iran’s compliance with the nuclear-related provisions of the JCPOA is verified by the International Atomic Energy Agency (IAEA) according to certain requirements set forth in the agreement. |
| 70882f40d459-c33e-4d7b-9ea3-1bc04fb01501 | Not Translated (0%) | On May 8, 2018, President Trump announced that the United States would withdraw from the JCPOA and reinstate US nuclear sanctions on the Iranian regime. | On May 8, 2018, President Trump announced that the United States would withdraw from the JCPOA and reinstate US nuclear sanctions on the Iranian regime. |
| 70895a1473ee-4dd0-4012-b6ac-77cd945c5b42 | Not Translated (0%) | Jurisdiction of citizenship | Jurisdiction of citizenship |
| 7090e9445f58-1e61-4844-bfca-35df7dcbea5a | Not Translated (0%) | The country (or countries, in the case of dual citizenship) in which an individual is a legal citizen. | The country (or countries, in the case of dual citizenship) in which an individual is a legal citizen. |
| 70916d3a0759-0b8f-492b-8330-81d8903cdc6a | Not Translated (0%) | Jurisdiction of residence | Jurisdiction of residence |
| 7092f35c60e1-59a0-409e-a8a0-a9f4e959e108 | Not Translated (0%) | The country in which an individual resides most of the time; the country in which an individual lives in his or her primary residence. | The country in which an individual resides most of the time; the country in which an individual lives in his or her primary residence. |
| 7093797c4320-140e-4dc4-9e22-9b689d49d0fe | Not Translated (0%) | Kleptocrat | Kleptocrat |
| 7094aa6b03b1-ee91-4f2c-99e9-bd3ba341e6d9 | Not Translated (0%) | A corrupt leader who exploits the people and resources of a state for personal gain. | A corrupt leader who exploits the people and resources of a state for personal gain. |
| 70956c01ae83-a753-4ced-af26-eec131815fab | Not Translated (0%) | Know your customer (KYC) | Know your customer (KYC) |
| 709690d4759b-b6b3-49fc-a394-c5fa7b856605 | Not Translated (0%) | Anti-money laundering policies and procedures used to determine the true identity of a customer and the type of activity that is normal and expected, and to detect activity that is unusual for a particular customer. | Anti-money laundering policies and procedures used to determine the true identity of a customer and the type of activity that is normal and expected, and to detect activity that is unusual for a particular customer. |
| 7097acf33275-091f-440e-a729-09ca904367d1 | Not Translated (0%) | Letter of credit | Letter of credit |
| 70987e484ffc-c408-45d5-8f80-5d786edef31c | Not Translated (0%) | A credit instrument issued by a bank that guarantees payments on behalf of its customer to a third party when certain conditions are met. | A credit instrument issued by a bank that guarantees payments on behalf of its customer to a third party when certain conditions are met. |
| 7099aa1e426c-2ee0-4aa2-8ece-1b8fd9454d6e | Not Translated (0%) | License | License |
| 7100c0459747-c0d9-4f40-9364-ab9cf13a6dc2 | Not Translated (0%) | A written authorization issued by a sanctions regulator that permits an activity that otherwise might be prohibited or restricted under a particular sanction. | A written authorization issued by a sanctions regulator that permits an activity that otherwise might be prohibited or restricted under a particular sanction. |
| 7101c0459747-c0d9-4f40-9364-ab9cf13a6dc2 | Not Translated (0%) | The laws or regulations passed to implement financial sanctions generally include language that allows otherwise prohibited transactions to take place under specific circumstances, whether via a general or specific license. | The laws or regulations passed to implement financial sanctions generally include language that allows otherwise prohibited transactions to take place under specific circumstances, whether via a general or specific license. |
| 7102c0459747-c0d9-4f40-9364-ab9cf13a6dc2 | Not Translated (0%) | A general license is an exemption that all persons may transact under—an example would be transacting for purposes of humanitarian aid. | A general license is an exemption that all persons may transact under—an example would be transacting for purposes of humanitarian aid. |
| 7103c0459747-c0d9-4f40-9364-ab9cf13a6dc2 | Not Translated (0%) | A specific license is an exception for the applicant of the license and establishes the circumstances in which the applicant may transact if the license is granted. | A specific license is an exception for the applicant of the license and establishes the circumstances in which the applicant may transact if the license is granted. |
| 710469a369f9-f990-4ddf-8c1b-383a7efb2302 | Not Translated (0%) | Limited Liability Company (LLC) | Limited Liability Company (LLC) |
| 710535ee0dbb-b31a-455a-a54e-42e81c730e17 | Not Translated (0%) | A specifically defined type of business in the United States, in which personal liability is separated from corporate liability. | A specifically defined type of business in the United States, in which personal liability is separated from corporate liability. |
| 710635ee0dbb-b31a-455a-a54e-42e81c730e17 | Not Translated (0%) | LLCs are especially popular in high-risk businesses, as the individuals (owners, directors, etc.) associated with such ventures seek to avoid personal accountability for corporate debts or lawsuits. | LLCs are especially popular in high-risk businesses, as the individuals (owners, directors, etc.) associated with such ventures seek to avoid personal accountability for corporate debts or lawsuits. |
| 7107e9167222-b53a-4984-b423-aef8b78b7377 | Not Translated (0%) | Look-back (or look-back review) | Look-back (or look-back review) |
| 7108e67297b4-000a-4185-a26c-a939eb8851c8 | Not Translated (0%) | The process of looking back at a customer’s transaction activity over a specific time period in the past. | The process of looking back at a customer’s transaction activity over a specific time period in the past. |
| 7109e67297b4-000a-4185-a26c-a939eb8851c8 | Not Translated (0%) | Look-back reviews of past transactions can help verify a customer’s actual activity and provide “red flags” by identifying transactions that might indicate links to sanctions targets, jurisdictions, or restrictions. | Look-back reviews of past transactions can help verify a customer’s actual activity and provide “red flags” by identifying transactions that might indicate links to sanctions targets, jurisdictions, or restrictions. |
| 7110bf9e3fe7-ecb1-4145-b131-28ad91b6c7d1 | Not Translated (0%) | Mandatory sanctions lists | Mandatory sanctions lists |
| 7111cc920ce4-823a-4455-b750-93e622302c11 | Not Translated (0%) | Supranational sanctions lists, such as those including targets designated by the United Nations Security Council Resolutions (UNSCR), which must be screened against. | Supranational sanctions lists, such as those including targets designated by the United Nations Security Council Resolutions (UNSCR), which must be screened against. |
| 7112cc920ce4-823a-4455-b750-93e622302c11 | Not Translated (0%) | Depending on the country in which a business is located and operates, local sanctions regimes may be required (i.e., mandatory) and would need to be included within a firm’s sanctions compliance program. | Depending on the country in which a business is located and operates, local sanctions regimes may be required (i.e., mandatory) and would need to be included within a firm’s sanctions compliance program. |
| 7113b0c1e303-cebe-426a-90fd-02c6acadbc28 | Not Translated (0%) | Mirror trades | Mirror trades |
| 7114fa081664-12f2-4223-b369-c5f8edd2ff67 | Not Translated (0%) | A type of trade that involves buying securities in one currency and then selling identical ones in another currency. | A type of trade that involves buying securities in one currency and then selling identical ones in another currency. |
| 7115adde6550-ab77-4257-a58e-2ac33337a824 | Not Translated (0%) | Money laundering | Money laundering |
| 7116944ea6f0-8ce5-4356-95d4-6b098b10d3b7 | Not Translated (0%) | The process of concealing or disguising the existence, source, movement, destination, or illegal application of illicitly derived property or funds to make them appear legitimate. | The process of concealing or disguising the existence, source, movement, destination, or illegal application of illicitly derived property or funds to make them appear legitimate. |
| 7117944ea6f0-8ce5-4356-95d4-6b098b10d3b7 | Not Translated (0%) | It usually involves a three-part system: placement of funds into a financial system; layering of transactions to disguise the source, ownership, and location of the funds; and integration of the funds into society in the form of holdings that appear legitimate. | It usually involves a three-part system: placement of funds into a financial system; layering of transactions to disguise the source, ownership, and location of the funds; and integration of the funds into society in the form of holdings that appear legitimate. |
| 7118944ea6f0-8ce5-4356-95d4-6b098b10d3b7 | Not Translated (0%) | The definition of money laundering varies in each country where it is recognized as a crime. | The definition of money laundering varies in each country where it is recognized as a crime. |
| 7119740306e7-197b-4c94-98b1-8eb3094aee94 | Not Translated (0%) | Multilateral sanctions | Multilateral sanctions |
| 7120f9c31fc3-038e-4889-ba21-ecd783e96be7 | Not Translated (0%) | Multilateral sanctions are restrictions supported by more than one country or entity. | Multilateral sanctions are restrictions supported by more than one country or entity. |
| 7121f9c31fc3-038e-4889-ba21-ecd783e96be7 | Not Translated (0%) | These can be imposed by allies against a common enemy or for the purpose of realizing a greater economic and punitive impact. | These can be imposed by allies against a common enemy or for the purpose of realizing a greater economic and punitive impact. |
| 7122ea4dafb1-48f1-4203-91d0-16e41cc3fa10 | Not Translated (0%) | Mutual evaluation report (MER) | Mutual evaluation report (MER) |
| 7123be5b41d3-0d77-4c86-81db-33e18090807e | Not Translated (0%) | Reports giving an in-depth description and analysis of a country’s systems for limiting financial crimes based on FATF recommendations. | Reports giving an in-depth description and analysis of a country’s systems for limiting financial crimes based on FATF recommendations. |
| 7124be5b41d3-0d77-4c86-81db-33e18090807e | Not Translated (0%) | While the reports are not sanctions, they have the potential to influence the risk a financial institution will take when dealing with a particular country or region. | While the reports are not sanctions, they have the potential to influence the risk a financial institution will take when dealing with a particular country or region. |
| 712552cd249b-c817-4aae-8cd2-c450750d1454 | Not Translated (0%) | Name screening | Name screening |
| 71265e6b1ca4-7390-45de-9e18-53bf6fbc8df1 | Not Translated (0%) | The process of matching an internal record (i.e., customer, counterparty, related account party) against a sanctioned list record, either manually or through an automated screening tool. | The process of matching an internal record (i.e., customer, counterparty, related account party) against a sanctioned list record, either manually or through an automated screening tool. |
| 71275e6b1ca4-7390-45de-9e18-53bf6fbc8df1 | Not Translated (0%) | Name screening may also include batch name screening, which allows a firm to screen its entire customer base using automatic screening tools on a periodic basis. | Name screening may also include batch name screening, which allows a firm to screen its entire customer base using automatic screening tools on a periodic basis. |
| 71285e6b1ca4-7390-45de-9e18-53bf6fbc8df1 | Not Translated (0%) | When onboarding new customers, name screening against sanctions lists is undertaken prior to accepting a new customer relationship, and it is done in real time. | When onboarding new customers, name screening against sanctions lists is undertaken prior to accepting a new customer relationship, and it is done in real time. |
| 71295e6b1ca4-7390-45de-9e18-53bf6fbc8df1 | Not Translated (0%) | Name screening forms a part of entry controls, which give the financial institution more opportunities to collect SDD information. | Name screening forms a part of entry controls, which give the financial institution more opportunities to collect SDD information. |
| 71300531041f-7bcd-4b18-b608-2b16a795408d | Not Translated (0%) | Naming conventions | Naming conventions |
| 713188f58086-7aab-4dd7-8302-49e788e38460 | Not Translated (0%) | The ways in which an individual’s name is given to or used by him or her. | The ways in which an individual’s name is given to or used by him or her. |
| 713288f58086-7aab-4dd7-8302-49e788e38460 | Not Translated (0%) | Names can be presented in many ways, largely dependent upon the country or cultural norms of the country where the individual was born or raised. | Names can be presented in many ways, largely dependent upon the country or cultural norms of the country where the individual was born or raised. |
| 713399b64e11-e68d-449e-ab01-ba3ee0ece37b | Not Translated (0%) | Nested account | Nested account |
| 713497255e3c-4266-43fa-902d-571e6a54b93e | Not Translated (0%) | The use of a bank’s correspondent relationship by a number of underlying banks or financial institutions through their relationships with the correspondent bank’s direct customer. | The use of a bank’s correspondent relationship by a number of underlying banks or financial institutions through their relationships with the correspondent bank’s direct customer. |
| 713597255e3c-4266-43fa-902d-571e6a54b93e | Not Translated (0%) | The underlying respondent banks or financial institutions conduct transactions and obtain access to other financial services without being direct customers of the correspondent bank. | The underlying respondent banks or financial institutions conduct transactions and obtain access to other financial services without being direct customers of the correspondent bank. |
| 71369d78804f-fe02-40d2-ab92-1543e5a106f2 | Not Translated (0%) | Nesting | Nesting |
| 71378eec802a-45e8-4e05-bada-0ff242c0baf3 | Not Translated (0%) | The practice where a respondent bank provides downstream correspondent services to other financial institutions and processes these transactions through its own correspondent account. | The practice where a respondent bank provides downstream correspondent services to other financial institutions and processes these transactions through its own correspondent account. |
| 71388eec802a-45e8-4e05-bada-0ff242c0baf3 | Not Translated (0%) | The correspondent bank is thus processing transactions for financial institutions on which it has not conducted due diligence. | The correspondent bank is thus processing transactions for financial institutions on which it has not conducted due diligence. |
| 71398eec802a-45e8-4e05-bada-0ff242c0baf3 | Not Translated (0%) | Although this is a normal part of correspondent banking, it requires the correspondent bank to conduct enhanced due diligence on its respondent’s AML program to adequately mitigate the risk of processing the customer’s customers’ transaction. | Although this is a normal part of correspondent banking, it requires the correspondent bank to conduct enhanced due diligence on its respondent’s AML program to adequately mitigate the risk of processing the customer’s customers’ transaction. |
| 7140dacadba9-ecf9-44ad-96db-3287beb63051 | Not Translated (0%) | Nominee director or shareholder | Nominee director or shareholder |
| 714139ab0aa6-ddd1-4d36-9c97-415404191a3c | Not Translated (0%) | Person who is not the actual director or shareholder of a company but who is appointed to act on behalf of its directors or shareholders. | Person who is not the actual director or shareholder of a company but who is appointed to act on behalf of its directors or shareholders. |
| 714239ab0aa6-ddd1-4d36-9c97-415404191a3c | Not Translated (0%) | Although the use of nominee shareholders is also in rapid decline, the use of nominee directors is still common. | Although the use of nominee shareholders is also in rapid decline, the use of nominee directors is still common. |
| 714319ef9a99-a25f-4f96-9c69-36d2de3567cc | Not Translated (0%) | Non-Proliferation Treaty (NPT) | Non-Proliferation Treaty (NPT) |
| 7144c5aa994b-bba3-4c33-aced-b64a87c46a43 | Not Translated (0%) | The UN Treaty on the Non-Proliferation of Nuclear Weapons was signed in 1968 and went into effect in March 1970. | The UN Treaty on the Non-Proliferation of Nuclear Weapons was signed in 1968 and went into effect in March 1970. |
| 7145c5aa994b-bba3-4c33-aced-b64a87c46a43 | Not Translated (0%) | The NPT solidified the commitment of signing countries to prevent the spread of nuclear weapons. | The NPT solidified the commitment of signing countries to prevent the spread of nuclear weapons. |
| 7146c5aa994b-bba3-4c33-aced-b64a87c46a43 | Not Translated (0%) | Its goal was to minimize the risk of the use of nuclear weapons in conflict, which could result in significant destruction. | Its goal was to minimize the risk of the use of nuclear weapons in conflict, which could result in significant destruction. |
| 7147c5aa994b-bba3-4c33-aced-b64a87c46a43 | Not Translated (0%) | Likewise, the NPT sought to keep the weapons out of the hands of rogue nations and terrorists. | Likewise, the NPT sought to keep the weapons out of the hands of rogue nations and terrorists. |
| 71489762c993-5b32-48fc-8bb3-b176ec2e71a2 | Not Translated (0%) | Office of Foreign Assets Control (OFAC) | Office of Foreign Assets Control (OFAC) |
| 714946de245c-58c9-465b-ae20-6db706626261 | Not Translated (0%) | The agency within the US Department of the Treasury responsible for administering and enforcing economic sanctions issued as part of US foreign policy and by international organizations like the United Nations against targeted foreign countries. | The agency within the US Department of the Treasury responsible for administering and enforcing economic sanctions issued as part of US foreign policy and by international organizations like the United Nations against targeted foreign countries. |
| 715046de245c-58c9-465b-ae20-6db706626261 | Not Translated (0%) | It often works in consultation with other agencies, such as the Department of State, to oversee national security goals. | It often works in consultation with other agencies, such as the Department of State, to oversee national security goals. |
| 715146de245c-58c9-465b-ae20-6db706626261 | Not Translated (0%) | A core component of the agency’s responsibilities is the creation and maintenance of the Specially Designated Nationals (SDN) list. | A core component of the agency’s responsibilities is the creation and maintenance of the Specially Designated Nationals (SDN) list. |
| 71521afccf4b-9e31-45cc-a1ea-4a472ffccaca | Not Translated (0%) | Office of the Superintendent of Financial Institutions (OSFI) | Office of the Superintendent of Financial Institutions (OSFI) |
| 7153487e7d49-6c9d-443d-add2-08b2ab4e5b5e | Not Translated (0%) | The primary agency regulating financial institutions in Canada. | The primary agency regulating financial institutions in Canada. |
| 71547eec8f5a-6fa4-4dc4-ab3d-7e9b85d75e4e | Not Translated (0%) | Partial match | Partial match |
| 7155a7642174-2567-4815-b17e-73272df4776d | Not Translated (0%) | A result generated by an AST. | A result generated by an AST. |
| 7156a7642174-2567-4815-b17e-73272df4776d | Not Translated (0%) | A partial match means the entity being screened is similar enough to the sanctioned entity based on fuzzy logic and potentially other identifying factors, such as date of birth. | A partial match means the entity being screened is similar enough to the sanctioned entity based on fuzzy logic and potentially other identifying factors, such as date of birth. |
| 7157a7642174-2567-4815-b17e-73272df4776d | Not Translated (0%) | Partial matches require further human intervention to determine whether the match is a target match (or true match), i.e., whether the name being screened is the same entity as the sanctioned target. | Partial matches require further human intervention to determine whether the match is a target match (or true match), i.e., whether the name being screened is the same entity as the sanctioned target. |
| 7158de77d774-a107-429c-8dc3-91b3fd6ef9ff | Not Translated (0%) | Pass-through sanctions risk | Pass-through sanctions risk |
| 715961395898-8d6f-4282-b1b8-7cab02095540 | Not Translated (0%) | The incorrect assumption that the sanctions risks associated with a customer’s affiliates or subsidiaries is simply a problem for the customer to assess and manage. | The incorrect assumption that the sanctions risks associated with a customer’s affiliates or subsidiaries is simply a problem for the customer to assess and manage. |
| 716061395898-8d6f-4282-b1b8-7cab02095540 | Not Translated (0%) | Regulators in the United Kingdom and United States require all parties within a transaction chain to check for possible sanctions risks. | Regulators in the United Kingdom and United States require all parties within a transaction chain to check for possible sanctions risks. |
| 716161395898-8d6f-4282-b1b8-7cab02095540 | Not Translated (0%) | It is important for financial institutions to ask for and review information about a customer’s affiliates and subsidiaries. | It is important for financial institutions to ask for and review information about a customer’s affiliates and subsidiaries. |
| 71621f9b58b7-4d1f-4e00-83e8-95d675c9f65d | Not Translated (0%) | Payment screening | Payment screening |
| 7163a510b007-d4ed-4e8e-a2ee-2134be358cdc | Not Translated (0%) | A method of screening that focuses on screening payment messages. | A method of screening that focuses on screening payment messages. |
| 7164a510b007-d4ed-4e8e-a2ee-2134be358cdc | Not Translated (0%) | Unlike name screening, payment screening takes place with current customers and is performed before a payment or message is processed. | Unlike name screening, payment screening takes place with current customers and is performed before a payment or message is processed. |
| 7165a510b007-d4ed-4e8e-a2ee-2134be358cdc | Not Translated (0%) | Payment screening relies on payment messages using predefined templates, codes, and acronyms to describe certain information. | Payment screening relies on payment messages using predefined templates, codes, and acronyms to describe certain information. |
| 7166a510b007-d4ed-4e8e-a2ee-2134be358cdc | Not Translated (0%) | The information provided in these predefined templates is typically provided by a third party; therefore, the firm has little, if any, control over how the data is presented. | The information provided in these predefined templates is typically provided by a third party; therefore, the firm has little, if any, control over how the data is presented. |
| 7167b5030283-2645-411b-b59a-ce4e7b011a8d | Not Translated (0%) | Payments, cross border | Payments, cross border |
| 7168107bb0e1-ff23-4729-a441-16719e0e3ba4 | Not Translated (0%) | Payments that involve more than one country, whether by physically transporting cash across an international border, or by transferring money electronically from one country to another. | Payments that involve more than one country, whether by physically transporting cash across an international border, or by transferring money electronically from one country to another. |
| 7169c31407ac-725c-4217-baab-81dc92681524 | Not Translated (0%) | Real Time Gross Settlement Systems (RTGS) | Real Time Gross Settlement Systems (RTGS) |
| 717072858c8a-6609-4dd6-86ae-941aee1a03c9 | Not Translated (0%) | International wire transfers use RTGS within a given jurisdiction. | International wire transfers use RTGS within a given jurisdiction. |
| 717172858c8a-6609-4dd6-86ae-941aee1a03c9 | Not Translated (0%) | In RTGS, money or securities are transferred between banks on a “real time” and “gross” basis, meaning that payment transactions are not subject to a waiting period, and each transaction is settled on a one-on-one basis. | In RTGS, money or securities are transferred between banks on a “real time” and “gross” basis, meaning that payment transactions are not subject to a waiting period, and each transaction is settled on a one-on-one basis. |
| 7172e771cd6d-c7d7-461b-b913-6c8cfebaf83c | Not Translated (0%) | Reasonable cause (to suspect) | Reasonable cause (to suspect) |
| 7173b526559b-c759-4eb6-bf4f-5fb4fef07d79 | Not Translated (0%) | In the United Kingdom, in the absence of definite knowledge of wrongdoing, a firm must have reasonable cause to suspect that it is in possession of, or controlling the economic assets of, a designated person. | In the United Kingdom, in the absence of definite knowledge of wrongdoing, a firm must have reasonable cause to suspect that it is in possession of, or controlling the economic assets of, a designated person. |
| 7174b526559b-c759-4eb6-bf4f-5fb4fef07d79 | Not Translated (0%) | Reasonable cause to suspect is defined as a set of circumstances from which an honest and reasonable person should have inferred knowledge or formed the suspicion of wrongdoing. | Reasonable cause to suspect is defined as a set of circumstances from which an honest and reasonable person should have inferred knowledge or formed the suspicion of wrongdoing. |
| 717553edfbec-fd8f-4b62-94a4-23e7318ab3fc | Not Translated (0%) | Red flag | Red flag |
| 7176ac5e3f2e-33ac-42be-84e8-90784964ccf8 | Not Translated (0%) | A warning signal that should bring attention to a potentially suspicious situation, transaction, or activity. | A warning signal that should bring attention to a potentially suspicious situation, transaction, or activity. |
| 7177f20af779-3a10-437f-b0bf-a4e806cf0e47 | Not Translated (0%) | Register, corporate | Register, corporate |
| 7178f1a45a50-bafa-40c9-8a5b-1cdff7f9fac3 | Not Translated (0%) | A corporate register is a listing of key information about the company, such as when a corporation was formed and who its owners and directors are. | A corporate register is a listing of key information about the company, such as when a corporation was formed and who its owners and directors are. |
| 7179f1a45a50-bafa-40c9-8a5b-1cdff7f9fac3 | Not Translated (0%) | Corporate (or company) registers are often publicly available on the company’s website or websites maintained by professional associations or entities, such as chambers of commerce or legal databases. | Corporate (or company) registers are often publicly available on the company’s website or websites maintained by professional associations or entities, such as chambers of commerce or legal databases. |
| 7180f1a45a50-bafa-40c9-8a5b-1cdff7f9fac3 | Not Translated (0%) | In the United States, the secretary of state for each state and the District of Columbia maintains an online register for corporations doing business in that state. | In the United States, the secretary of state for each state and the District of Columbia maintains an online register for corporations doing business in that state. |
| 7181eb9516ed-8c68-4702-97e6-6bad85fe084f | Not Translated (0%) | Reporting requirements, initial and periodic | Reporting requirements, initial and periodic |
| 7182f873ca60-e06e-4dd3-b598-53eaaa11ca90 | Not Translated (0%) | Initial reporting and periodic reporting often exist side by side. | Initial reporting and periodic reporting often exist side by side. |
| 7183f873ca60-e06e-4dd3-b598-53eaaa11ca90 | Not Translated (0%) | Initial reporting occurs immediately when funds are identified and a freeze or reject is activated; this report usually includes providing the regulatory body with a detailed breakdown of the financial institution’s exposure to the sanctions target. | Initial reporting occurs immediately when funds are identified and a freeze or reject is activated; this report usually includes providing the regulatory body with a detailed breakdown of the financial institution’s exposure to the sanctions target. |
| 7184f873ca60-e06e-4dd3-b598-53eaaa11ca90 | Not Translated (0%) | In addition, many jurisdictions require annual (as is the case for OFAC) or quarterly reports from the financial institution about blocked assets. | In addition, many jurisdictions require annual (as is the case for OFAC) or quarterly reports from the financial institution about blocked assets. |
| 7185f873ca60-e06e-4dd3-b598-53eaaa11ca90 | Not Translated (0%) | These reports provide a summary of the assets the firm is holding in compliance with specific sanctions restrictions and how the assets have been segregated. | These reports provide a summary of the assets the firm is holding in compliance with specific sanctions restrictions and how the assets have been segregated. |
| 7186e68bb2fa-9b81-444d-a2a3-769d3118a6aa | Not Translated (0%) | Reputational risk | Reputational risk |
| 71876ff7c947-ea11-4323-8a79-686e57c76f65 | Not Translated (0%) | The potential that adverse publicity regarding a financial institution’s business practices and associations, whether accurate or not, will cause a loss of confidence in the integrity of the institution. | The potential that adverse publicity regarding a financial institution’s business practices and associations, whether accurate or not, will cause a loss of confidence in the integrity of the institution. |
| 71886ff7c947-ea11-4323-8a79-686e57c76f65 | Not Translated (0%) | Banks and other financial institutions are especially vulnerable to reputational risk because they can become a vehicle for, or a victim of, illegal activities perpetrated by customers. | Banks and other financial institutions are especially vulnerable to reputational risk because they can become a vehicle for, or a victim of, illegal activities perpetrated by customers. |
| 71896ff7c947-ea11-4323-8a79-686e57c76f65 | Not Translated (0%) | Such institutions may protect themselves through Know Your Customer and know-your-employee programs. | Such institutions may protect themselves through Know Your Customer and know-your-employee programs. |
| 719024b6d63c-694a-461b-9bab-3d75bd5b9df4 | Not Translated (0%) | Respondent bank | Respondent bank |
| 719153441fce-6c89-47d5-9c4c-5c82db0e5ea8 | Not Translated (0%) | A bank for which another financial institution establishes, maintains, administers, or manages a correspondent account. | A bank for which another financial institution establishes, maintains, administers, or manages a correspondent account. |
| 719218b37ddd-d02c-45f1-af74-55f3eb7a9702 | Not Translated (0%) | Restrictive measures | Restrictive measures |
| 71939b7b5110-e29e-4de9-a922-33ada845ecd6 | Not Translated (0%) | see sanctions | see sanctions |
| 71944c6ec86a-e4a7-4d42-bcf3-2aea220bce1e | Not Translated (0%) | Risk appetite | Risk appetite |
| 71951ee131a2-7f05-4fba-aa85-ae1cd656ccf0 | Not Translated (0%) | The amount of risk that a firm is willing to accept in pursuit of value or opportunity. | The amount of risk that a firm is willing to accept in pursuit of value or opportunity. |
| 71961ee131a2-7f05-4fba-aa85-ae1cd656ccf0 | Not Translated (0%) | A firm’s risk appetite reflects its risk management philosophy and comfort level for undertaking business in situations in which there could be an elevated sanctions risk. | A firm’s risk appetite reflects its risk management philosophy and comfort level for undertaking business in situations in which there could be an elevated sanctions risk. |
| 71971ee131a2-7f05-4fba-aa85-ae1cd656ccf0 | Not Translated (0%) | In turn, risk appetite influences the firm’s culture and operating style and guides resource allocation. | In turn, risk appetite influences the firm’s culture and operating style and guides resource allocation. |
| 71981ee131a2-7f05-4fba-aa85-ae1cd656ccf0 | Not Translated (0%) | An organization’s risk appetite is determined through the risk-assessment process and formalized in a Risk Appetite Statement or Framework. | An organization’s risk appetite is determined through the risk-assessment process and formalized in a Risk Appetite Statement or Framework. |
| 71991ee131a2-7f05-4fba-aa85-ae1cd656ccf0 | Not Translated (0%) | A business should determine its risk appetite based on the resources it has to invest in controls, staffing, and measures to protect its reputation. | A business should determine its risk appetite based on the resources it has to invest in controls, staffing, and measures to protect its reputation. |
| 72001ee131a2-7f05-4fba-aa85-ae1cd656ccf0 | Not Translated (0%) | Firms can have an overarching risk appetite (i.e., enterprise-wide) and/or have risk appetites defined on a more granular level (e.g., by department). | Firms can have an overarching risk appetite (i.e., enterprise-wide) and/or have risk appetites defined on a more granular level (e.g., by department). |
| 72014a97b94d-c018-4284-a5d3-c3ddd43b4880 | Not Translated (0%) | Risk assessment | Risk assessment |
| 72023f45632d-d4ef-4762-a90f-8750c1ff4854 | Not Translated (0%) | A tool that allows a business to identify and assess the extent to which it may be exposed to risks. | A tool that allows a business to identify and assess the extent to which it may be exposed to risks. |
| 72033f45632d-d4ef-4762-a90f-8750c1ff4854 | Not Translated (0%) | In global banking, risk assessments form the foundation of a sound sanctions compliance program. | In global banking, risk assessments form the foundation of a sound sanctions compliance program. |
| 72043f45632d-d4ef-4762-a90f-8750c1ff4854 | Not Translated (0%) | The key purpose of a risk assessment is to drive improvements in financial crime risk management by identifying the general and specific sanctions risks a financial institution is facing; the ways in which these risks are mitigated by a firm’s sanctions compliance program controls; and any additional controls to mitigate the residual risk that remains for the institution. | The key purpose of a risk assessment is to drive improvements in financial crime risk management by identifying the general and specific sanctions risks a financial institution is facing; the ways in which these risks are mitigated by a firm’s sanctions compliance program controls; and any additional controls to mitigate the residual risk that remains for the institution. |
| 72053f45632d-d4ef-4762-a90f-8750c1ff4854 | Not Translated (0%) | A well-planned and well-formulated risk assessment allows a business to understand its risk profile and then determine its risk appetite for undertaking business in situations in which there could be an elevated sanctions risk. | A well-planned and well-formulated risk assessment allows a business to understand its risk profile and then determine its risk appetite for undertaking business in situations in which there could be an elevated sanctions risk. |
| 7206e736cb00-1a8f-437f-b06c-cf0723c59734 | Not Translated (0%) | Romanization | Romanization |
| 7207d31e89e1-7879-4c6b-969a-305560a63cd0 | Not Translated (0%) | The process of taking a different writing system (i.e., one that often does not use the Latin A–Z alphabet) and converting it into Latin script—that is, converting writing into the script that languages, such as English, are written in today. | The process of taking a different writing system (i.e., one that often does not use the Latin A–Z alphabet) and converting it into Latin script—that is, converting writing into the script that languages, such as English, are written in today. |
| 7208d31e89e1-7879-4c6b-969a-305560a63cd0 | Not Translated (0%) | Some scripts do not have equivalent letters or symbols; as a result, there can be variations in the spelling of names and words, even when they’re written in the standard alphabet. | Some scripts do not have equivalent letters or symbols; as a result, there can be variations in the spelling of names and words, even when they’re written in the standard alphabet. |
| 7209a3b9d21f-c259-4823-a2f9-1709bdf88209 | Not Translated (0%) | Sanctions | Sanctions |
| 72105da3983f-1f2b-47ad-b150-7b628c7865f0 | Not Translated (0%) | Sanctions are punitive or restrictive actions taken by individual countries, regimes, or coalitions with the primary purpose of provoking a change in behavior or policy. | Sanctions are punitive or restrictive actions taken by individual countries, regimes, or coalitions with the primary purpose of provoking a change in behavior or policy. |
| 72115da3983f-1f2b-47ad-b150-7b628c7865f0 | Not Translated (0%) | Sanctions can restrict trade, financial transactions, diplomatic relations, and movement. | Sanctions can restrict trade, financial transactions, diplomatic relations, and movement. |
| 72125da3983f-1f2b-47ad-b150-7b628c7865f0 | Not Translated (0%) | They can be specific or general in their implementation and enforcement. | They can be specific or general in their implementation and enforcement. |
| 72135da3983f-1f2b-47ad-b150-7b628c7865f0 | Not Translated (0%) | Sanctions are also referred to as restrictive measures. | Sanctions are also referred to as restrictive measures. |
| 72147b02374f-7910-4f9e-9ee9-8e57abe5920e | Not Translated (0%) | Sanctions compliance | Sanctions compliance |
| 721541379f2e-6285-4324-a2fb-1ee059abddbe | Not Translated (0%) | The act of adhering to the sanctions-related legislation, regulations, rules, and norms that make up the complex sanctions landscape. | The act of adhering to the sanctions-related legislation, regulations, rules, and norms that make up the complex sanctions landscape. |
| 7216b98d528f-0bef-4ccb-a8c3-123bfb64ec18 | Not Translated (0%) | Sanctions compliance officer (SCO) | Sanctions compliance officer (SCO) |
| 72171156d002-6e62-472b-a111-95cb0bd97476 | Not Translated (0%) | Within the second line of defense in the governance structure of a sanctions compliance program, the SCO is responsible for ongoing monitoring for sanctions compliance, including sample testing and a review of exception reports, to enable the escalation of identified non-compliance or other issues to senior management and, where appropriate, the board. | Within the second line of defense in the governance structure of a sanctions compliance program, the SCO is responsible for ongoing monitoring for sanctions compliance, including sample testing and a review of exception reports, to enable the escalation of identified non-compliance or other issues to senior management and, where appropriate, the board. |
| 72181156d002-6e62-472b-a111-95cb0bd97476 | Not Translated (0%) | The SCO is the contact point for all sanctions-related issues for internal and external authorities and is responsible for reporting suspicious transactions. | The SCO is the contact point for all sanctions-related issues for internal and external authorities and is responsible for reporting suspicious transactions. |
| 72191156d002-6e62-472b-a111-95cb0bd97476 | Not Translated (0%) | To enable the successful oversight of the sanctions compliance program, the SCO must have sufficient independence from the business lines to prevent conflicts of interest and unbiased advice and counsel. | To enable the successful oversight of the sanctions compliance program, the SCO must have sufficient independence from the business lines to prevent conflicts of interest and unbiased advice and counsel. |
| 72200969a356-22fe-4dac-90cc-58f00c6c0f6f | Not Translated (0%) | Sanctions compliance program (SCP) | Sanctions compliance program (SCP) |
| 7221ca1202e1-43cb-45ac-a3a3-c31a052e5fb0 | Not Translated (0%) | A program run by a firm to comply with regulator expectations concerning sanctions compliance and to manage the firm’s sanctions risk. | A program run by a firm to comply with regulator expectations concerning sanctions compliance and to manage the firm’s sanctions risk. |
| 7222ca1202e1-43cb-45ac-a3a3-c31a052e5fb0 | Not Translated (0%) | OFAC encourages organizations subject to US jurisdiction to use a risk-based approach to sanctions compliance by developing, implementing, and regularly updating SCPs. | OFAC encourages organizations subject to US jurisdiction to use a risk-based approach to sanctions compliance by developing, implementing, and regularly updating SCPs. |
| 7223ca1202e1-43cb-45ac-a3a3-c31a052e5fb0 | Not Translated (0%) | SCPs follow a similar methodology to that adopted by anti-money laundering compliance programs. | SCPs follow a similar methodology to that adopted by anti-money laundering compliance programs. |
| 7224ca1202e1-43cb-45ac-a3a3-c31a052e5fb0 | Not Translated (0%) | According to OFAC, the five essential components of an SCP are (1) management commitment; (2) risk assessment; (3) internal controls; (4) testing and auditing; and (5) training. | According to OFAC, the five essential components of an SCP are (1) management commitment; (2) risk assessment; (3) internal controls; (4) testing and auditing; and (5) training. |
| 722529e24836-60d7-40d1-9a40-5b51b667d49e | Not Translated (0%) | Sanctions evasion | Sanctions evasion |
| 7226e3eb2c0f-c4ab-46e7-9f17-b28dbb60d220 | Not Translated (0%) | The deliberate attempt to remove or conceal the involvement of sanctioned places, entities, or individuals in a transaction or series of transactions. | The deliberate attempt to remove or conceal the involvement of sanctioned places, entities, or individuals in a transaction or series of transactions. |
| 7227e3eb2c0f-c4ab-46e7-9f17-b28dbb60d220 | Not Translated (0%) | When sanctions evasion is successful, a business that would have been flagged, taxed, restricted, or prohibited is allowed to proceed unhindered. | When sanctions evasion is successful, a business that would have been flagged, taxed, restricted, or prohibited is allowed to proceed unhindered. |
| 722883751b13-b35e-4839-b94e-f0616989082c | Not Translated (0%) | Sanctions due diligence (SDD) | Sanctions due diligence (SDD) |
| 7229a3e5e890-b876-400c-aabd-7055e225696d | Not Translated (0%) | A similar process to Know Your Customer (KYC) / Customer Due Diligence (CDD) that focuses on the risks specific to sanctions, taking into account governance and risk assessment. | A similar process to Know Your Customer (KYC) / Customer Due Diligence (CDD) that focuses on the risks specific to sanctions, taking into account governance and risk assessment. |
| 7230a3e5e890-b876-400c-aabd-7055e225696d | Not Translated (0%) | SDD builds upon the KYC/CDD information an organization collects as part of its existing AML program. | SDD builds upon the KYC/CDD information an organization collects as part of its existing AML program. |
| 7231a3e5e890-b876-400c-aabd-7055e225696d | Not Translated (0%) | SDD is applied throughout the life cycle of a relationship at the start of a relationship (i.e., onboarding); when new products are introduced, in response to trigger events during a relationship, such as a “match” generated by a screening tool; during periodic reviews; and when a relationship ends. | SDD is applied throughout the life cycle of a relationship at the start of a relationship (i.e., onboarding); when new products are introduced, in response to trigger events during a relationship, such as a “match” generated by a screening tool; during periodic reviews; and when a relationship ends. |
| 723296f0d6a6-b2e3-4472-8bc1-da4e6b1b7a0e | Not Translated (0%) | Sanctions list | Sanctions list |
| 7233953a7b08-d62f-472e-ac18-e1d9e86deb90 | Not Translated (0%) | A document or database listing individuals, legal entities, and countries with whom it is illegal to do business. | A document or database listing individuals, legal entities, and countries with whom it is illegal to do business. |
| 723411dc3ceb-1d08-4745-a8fc-938fc6616fb6 | Not Translated (0%) | Sanctions regime | Sanctions regime |
| 72351b3a31d9-3c21-4f57-b3d0-51a109eefb28 | Not Translated (0%) | A set of sanctions that have a common nexus or theme. | A set of sanctions that have a common nexus or theme. |
| 72361b3a31d9-3c21-4f57-b3d0-51a109eefb28 | Not Translated (0%) | These are either referred to by the issuer of the set of sanctions or by the intended purpose of the set of sanctions. | These are either referred to by the issuer of the set of sanctions or by the intended purpose of the set of sanctions. |
| 72371b3a31d9-3c21-4f57-b3d0-51a109eefb28 | Not Translated (0%) | For example, the “OFAC sanctions regime” or the “North Korea sanctions regime.” | For example, the “OFAC sanctions regime” or the “North Korea sanctions regime.” |
| 72381b3a31d9-3c21-4f57-b3d0-51a109eefb28 | Not Translated (0%) | Depending on the context, a sanctions regime may be limited to unilateral sanctions or may include multilateral sanctions. | Depending on the context, a sanctions regime may be limited to unilateral sanctions or may include multilateral sanctions. |
| 7239ac57a895-acd0-4a4e-9576-d979e8ecdefb | Not Translated (0%) | Scope of licensing | Scope of licensing |
| 7240228ea368-714e-42c5-9083-cc5d96acaac8 | Not Translated (0%) | Details on which activities are permitted with the license in question. | Details on which activities are permitted with the license in question. |
| 7241228ea368-714e-42c5-9083-cc5d96acaac8 | Not Translated (0%) | For example, if a firm is managing frozen assets for a customer and it needs to transfer some of the customer’s assets to a business (for example, a creditor with a legitimate claim), the firm needs to determine whether, and under what circumstances, the license allows this activity. | For example, if a firm is managing frozen assets for a customer and it needs to transfer some of the customer’s assets to a business (for example, a creditor with a legitimate claim), the firm needs to determine whether, and under what circumstances, the license allows this activity. |
| 7242760e3258-1e73-4837-938b-9fb9659b41d4 | Not Translated (0%) | Scope of permitted activities | Scope of permitted activities |
| 724360797f53-6435-4ac0-98f5-3aaacb5764f2 | Not Translated (0%) | Details on exactly which activities are permitted without a license under a sanction, and which are only permitted with a license. | Details on exactly which activities are permitted without a license under a sanction, and which are only permitted with a license. |
| 724460797f53-6435-4ac0-98f5-3aaacb5764f2 | Not Translated (0%) | A license may stipulate that certain activities are only permitted during a certain period of time or during specified seasons. | A license may stipulate that certain activities are only permitted during a certain period of time or during specified seasons. |
| 7245dcd8a1a7-b8e4-4823-8e78-6e8d9394e03e | Not Translated (0%) | Screening tools | Screening tools |
| 7246476745f3-a4ef-459f-ac4d-8bc972cb5207 | Not Translated (0%) | See automated screening tools (ASTs) | See automated screening tools (ASTs) |
| 724799ba18fd-40ff-4ab6-9f87-77df4aa4c904 | Not Translated (0%) | Second line of defense | Second line of defense |
| 7248542ca228-1f5c-4857-a559-a8d75053333b | Not Translated (0%) | The sanctions compliance function, the larger compliance function, and the human resources and technology departments comprise the second line of defense within the governance structure of a sanctions compliance program. | The sanctions compliance function, the larger compliance function, and the human resources and technology departments comprise the second line of defense within the governance structure of a sanctions compliance program. |
| 7249542ca228-1f5c-4857-a559-a8d75053333b | Not Translated (0%) | The sanctions compliance officer ensures ongoing monitoring for sanctions compliance to enable the escalation of identified issues. | The sanctions compliance officer ensures ongoing monitoring for sanctions compliance to enable the escalation of identified issues. |
| 7250542ca228-1f5c-4857-a559-a8d75053333b | Not Translated (0%) | In general, the second line exists to ensure that SDD procedures and processes applied by the first line are designed properly, firmly established, and applied as intended. | In general, the second line exists to ensure that SDD procedures and processes applied by the first line are designed properly, firmly established, and applied as intended. |
| 7251542ca228-1f5c-4857-a559-a8d75053333b | Not Translated (0%) | The second-line defense reviews the effectiveness of controls used to mitigate sanctions risks; provides information to the first line; and investigates possible noncompliance with sanctions restrictions. | The second-line defense reviews the effectiveness of controls used to mitigate sanctions risks; provides information to the first line; and investigates possible noncompliance with sanctions restrictions. |
| 7252fa6664bd-434c-489c-9cce-689afa5a5c8e | Not Translated (0%) | Sectoral sanction | Sectoral sanction |
| 725365cc714f-0117-489a-8116-c266ff8f87c3 | Not Translated (0%) | A newer form of restriction focused on targeting key entities and sectors of a country’s economy. | A newer form of restriction focused on targeting key entities and sectors of a country’s economy. |
| 725465cc714f-0117-489a-8116-c266ff8f87c3 | Not Translated (0%) | They prohibit certain types of transactions with certain people or entities in the targeted country within a targeted sector of the economy. | They prohibit certain types of transactions with certain people or entities in the targeted country within a targeted sector of the economy. |
| 725565cc714f-0117-489a-8116-c266ff8f87c3 | Not Translated (0%) | Sectoral sanctions are very dependent on facts and context when applied. | Sectoral sanctions are very dependent on facts and context when applied. |
| 72566d7a0a04-9a85-4e7a-921b-74e3e83453f0 | Not Translated (0%) | Sectoral Sanctions Identification list (SSI list) | Sectoral Sanctions Identification list (SSI list) |
| 72577b903a55-c96f-4df1-a4ac-7a13c01b6466 | Not Translated (0%) | A list of those targeted by sectoral sanctions. | A list of those targeted by sectoral sanctions. |
| 72587b903a55-c96f-4df1-a4ac-7a13c01b6466 | Not Translated (0%) | The SSI list is not part of the Specially Designated Nationals (SDN) list. | The SSI list is not part of the Specially Designated Nationals (SDN) list. |
| 72597b903a55-c96f-4df1-a4ac-7a13c01b6466 | Not Translated (0%) | However, individuals and companies on the SSI list may also appear on the SDN list. | However, individuals and companies on the SSI list may also appear on the SDN list. |
| 72607b903a55-c96f-4df1-a4ac-7a13c01b6466 | Not Translated (0%) | Note that the SDN list is very broad, and the SSI list against Russia is very narrow. | Note that the SDN list is very broad, and the SSI list against Russia is very narrow. |
| 7261aec7a6bc-871f-49f9-ac84-e9de7196f8dd | Not Translated (0%) | Selective sanctions | Selective sanctions |
| 7262f47d32ab-08ff-4178-b16b-971e4dbcd603 | Not Translated (0%) | See targeted sanctions | See targeted sanctions |
| 72632a88dea0-19ff-45da-bb7e-cc6cc278bcdf | Not Translated (0%) | Sham divestment | Sham divestment |
| 726423e75726-f639-423f-93b9-a400a3b2859a | Not Translated (0%) | A transaction in which a sanctions target sells assets or equity to close associates or other affiliated persons. | A transaction in which a sanctions target sells assets or equity to close associates or other affiliated persons. |
| 726523e75726-f639-423f-93b9-a400a3b2859a | Not Translated (0%) | These can include friends, colleagues, subordinates, business partners, and family members. | These can include friends, colleagues, subordinates, business partners, and family members. |
| 726623e75726-f639-423f-93b9-a400a3b2859a | Not Translated (0%) | Similar to using an isolation company, the idea is that the sanctions target no longer appears to “own” the assets or shares in a company. | Similar to using an isolation company, the idea is that the sanctions target no longer appears to “own” the assets or shares in a company. |
| 726723e75726-f639-423f-93b9-a400a3b2859a | Not Translated (0%) | However, the target continues to influence or control the asset or the company’s operations. | However, the target continues to influence or control the asset or the company’s operations. |
| 7268b4aec320-fb84-4170-9ab1-b136162ea571 | Not Translated (0%) | Shelf company | Shelf company |
| 726957799a87-0aed-44e7-a6e2-ff3871bc49aa | Not Translated (0%) | A company that has been created months or years ahead of time, often by a law firm or an accounting firm. | A company that has been created months or years ahead of time, often by a law firm or an accounting firm. |
| 727057799a87-0aed-44e7-a6e2-ff3871bc49aa | Not Translated (0%) | Then the company goes “on the shelf” until needed. | Then the company goes “on the shelf” until needed. |
| 727157799a87-0aed-44e7-a6e2-ff3871bc49aa | Not Translated (0%) | Some investors use these shelf companies, or “aged” companies, to gain a clean business record. | Some investors use these shelf companies, or “aged” companies, to gain a clean business record. |
| 7272551e5657-8823-4cdf-8bac-0dfa61469d3d | Not Translated (0%) | Shell company | Shell company |
| 72736095d829-a4a1-487d-9094-adedf445e72e | Not Translated (0%) | A company without active business or significant assets. | A company without active business or significant assets. |
| 72746095d829-a4a1-487d-9094-adedf445e72e | Not Translated (0%) | Shell companies are legal, but people sometimes use them illegitimately—for instance, to disguise business ownership. | Shell companies are legal, but people sometimes use them illegitimately—for instance, to disguise business ownership. |
| 7275d680e88a-65fd-4045-a376-1dc7e69c01f2 | Not Translated (0%) | Simple checks | Simple checks |
| 7276bd32237d-b2db-4dab-8faf-a6e5a1b50590 | Not Translated (0%) | One of the first steps in an investigation, simple checks are those initial actions taken to discount or confirm a sanctions link; an example of a simple check includes comparing data about a sanctions target with a firm’s Know Your Customer (KYC) data. | One of the first steps in an investigation, simple checks are those initial actions taken to discount or confirm a sanctions link; an example of a simple check includes comparing data about a sanctions target with a firm’s Know Your Customer (KYC) data. |
| 72774c287b62-1613-4657-8c27-9b998741e1be | Not Translated (0%) | Sources, primary | Sources, primary |
| 72785c04d2c9-c7df-49c6-b0a2-3a342eadf9e7 | Not Translated (0%) | Sources of information that provide direct evidence about a sanction or a sanctions target. | Sources of information that provide direct evidence about a sanction or a sanctions target. |
| 72795c04d2c9-c7df-49c6-b0a2-3a342eadf9e7 | Not Translated (0%) | Examples of primary sources include sanctions instruments, sanctions lists, trade activity lists, and transaction activity. | Examples of primary sources include sanctions instruments, sanctions lists, trade activity lists, and transaction activity. |
| 728078ca961a-d8cf-4656-9e9d-b09674ccaac9 | Not Translated (0%) | Sources, secondary | Sources, secondary |
| 7281e0184ab1-61be-448c-85d9-2b58b9290492 | Not Translated (0%) | Sources created “after the fact” that report on, analyze, or collect information that has already appeared in primary source documents. | Sources created “after the fact” that report on, analyze, or collect information that has already appeared in primary source documents. |
| 7282e0184ab1-61be-448c-85d9-2b58b9290492 | Not Translated (0%) | If there is a discrepancy between primary sources and secondary sources, it is a red flag that deserves, at minimum, further investigation in order to clarify the discrepancy. | If there is a discrepancy between primary sources and secondary sources, it is a red flag that deserves, at minimum, further investigation in order to clarify the discrepancy. |
| 7283e0184ab1-61be-448c-85d9-2b58b9290492 | Not Translated (0%) | Examples of secondary sources include corporate registers, third-party databases, and media publications. | Examples of secondary sources include corporate registers, third-party databases, and media publications. |
| 7284e1cc17e7-64c0-486a-9aa1-fcd59ab91a8f | Not Translated (0%) | Specially Designated Nationals and Blocked Persons list (SDN list) | Specially Designated Nationals and Blocked Persons list (SDN list) |
| 7285edd15ac1-0a77-444b-be41-8a37b85c3c7e | Not Translated (0%) | A list of individuals and companies, published by OFAC, that are owned, controlled by, or acting on behalf of a targeted country. | A list of individuals and companies, published by OFAC, that are owned, controlled by, or acting on behalf of a targeted country. |
| 7286edd15ac1-0a77-444b-be41-8a37b85c3c7e | Not Translated (0%) | The list also includes groups and people, such as terrorists or drug traffickers, who are associated with a specific crime as opposed to a country. | The list also includes groups and people, such as terrorists or drug traffickers, who are associated with a specific crime as opposed to a country. |
| 7287edd15ac1-0a77-444b-be41-8a37b85c3c7e | Not Translated (0%) | The US Department of the Treasury maintains the list and may name a person or company as an SDN. | The US Department of the Treasury maintains the list and may name a person or company as an SDN. |
| 7288edd15ac1-0a77-444b-be41-8a37b85c3c7e | Not Translated (0%) | When the government identifies a person or company as an SDN, it blocks their assets and forbids US persons to do business with them. | When the government identifies a person or company as an SDN, it blocks their assets and forbids US persons to do business with them. |
| 7289edd15ac1-0a77-444b-be41-8a37b85c3c7e | Not Translated (0%) | The government may also impose fines and imprison lawbreakers. | The government may also impose fines and imprison lawbreakers. |
| 7290edd15ac1-0a77-444b-be41-8a37b85c3c7e | Not Translated (0%) | Also, individuals may lose their export privileges. | Also, individuals may lose their export privileges. |
| 7291edd15ac1-0a77-444b-be41-8a37b85c3c7e | Not Translated (0%) | The US government may put the person or business on a list of blocked, denied, or debarred individuals and institutions. | The US government may put the person or business on a list of blocked, denied, or debarred individuals and institutions. |
| 72927c3bf6b9-dac2-4ade-b40f-3d904238a65b | Not Translated (0%) | Smart sanctions | Smart sanctions |
| 7293982885d4-fdc4-460c-a271-58d8704d6a90 | Not Translated (0%) | see targeted sanctions | see targeted sanctions |
| 7294d3768c6d-62c3-4de0-bf76-cf6507a5a32a | Not Translated (0%) | Straw man | Straw man |
| 7295b47fbb90-a9cf-46ef-9122-258830dea958 | Not Translated (0%) | A non-sanctioned person with a low public profile who acts for or stands in the place of a sanctions target, also called a “front man.” | A non-sanctioned person with a low public profile who acts for or stands in the place of a sanctions target, also called a “front man.” |
| 7296b47fbb90-a9cf-46ef-9122-258830dea958 | Not Translated (0%) | The straw man does not act in any real sense as an owner or controller. | The straw man does not act in any real sense as an owner or controller. |
| 7297b47fbb90-a9cf-46ef-9122-258830dea958 | Not Translated (0%) | Instead, he or she carries out activities at the direction of the sanctions target, who is active in the background. | Instead, he or she carries out activities at the direction of the sanctions target, who is active in the background. |
| 7298db1aa2fb-4a43-4412-9305-67e4f749ddf6 | Not Translated (0%) | Strict liability | Strict liability |
| 729936c855f4-e124-4b0e-abe1-ff37cb4e9481 | Not Translated (0%) | The principle that an organization is liable even if it did not intend to violate or knowingly violate a sanction. | The principle that an organization is liable even if it did not intend to violate or knowingly violate a sanction. |
| 730036c855f4-e124-4b0e-abe1-ff37cb4e9481 | Not Translated (0%) | Organizations are also liable even if they have robust sanctions compliance programs in place. | Organizations are also liable even if they have robust sanctions compliance programs in place. |
| 7301d1197de8-e829-4d23-bab4-25e455863873 | Not Translated (0%) | String matching | String matching |
| 73025462d51b-62cf-41bc-831d-19e4bf16c3b2 | Not Translated (0%) | An algorithm for efficient searching that involves finding occurrence(s) of a pattern string within another string or body of text. | An algorithm for efficient searching that involves finding occurrence(s) of a pattern string within another string or body of text. |
| 73035462d51b-62cf-41bc-831d-19e4bf16c3b2 | Not Translated (0%) | Also referred to as pattern matching, this method can be used to recognize social security numbers, telephone numbers, zip codes, and any other information that follows a specific pattern. | Also referred to as pattern matching, this method can be used to recognize social security numbers, telephone numbers, zip codes, and any other information that follows a specific pattern. |
| 73045462d51b-62cf-41bc-831d-19e4bf16c3b2 | Not Translated (0%) | It is also useful for looking for information that follows leading text and then extracting the text that comes after it, as well as reprocessing documents. | It is also useful for looking for information that follows leading text and then extracting the text that comes after it, as well as reprocessing documents. |
| 73055462d51b-62cf-41bc-831d-19e4bf16c3b2 | Not Translated (0%) | This algorithm works by reading through text strings to match patterns. | This algorithm works by reading through text strings to match patterns. |
| 7306739692ec-3086-44a7-a1bb-570248575dd2 | Not Translated (0%) | Stripping | Stripping |
| 7307729f3c6c-fd29-4d5b-bec9-53678215f8e2 | Not Translated (0%) | Stripping involves omitting or removing key information, such as the sender’s name or the business name, from a payment message to avoid detection. | Stripping involves omitting or removing key information, such as the sender’s name or the business name, from a payment message to avoid detection. |
| 7308729f3c6c-fd29-4d5b-bec9-53678215f8e2 | Not Translated (0%) | It may happen with or without the knowledge of other participants in the transaction. | It may happen with or without the knowledge of other participants in the transaction. |
| 7309729f3c6c-fd29-4d5b-bec9-53678215f8e2 | Not Translated (0%) | When a wire transfer travels through multiple parties before reaching the intended final destination, there are multiple opportunities for information to be abbreviated, omitted, or altered. | When a wire transfer travels through multiple parties before reaching the intended final destination, there are multiple opportunities for information to be abbreviated, omitted, or altered. |
| 7310729f3c6c-fd29-4d5b-bec9-53678215f8e2 | Not Translated (0%) | For this reason, most jurisdictions have enacted laws that require payments to contain certain “basic” information, including the sender’s and the recipient’s name and address. | For this reason, most jurisdictions have enacted laws that require payments to contain certain “basic” information, including the sender’s and the recipient’s name and address. |
| 7311729f3c6c-fd29-4d5b-bec9-53678215f8e2 | Not Translated (0%) | When a wire originates from a sanctioned entity or location, and the intent is to deliver it within the United States or European Union, where restrictions would ordinarily flag the payment and block it, sanctions evaders have an incentive to remove the information that would trip the system. | When a wire originates from a sanctioned entity or location, and the intent is to deliver it within the United States or European Union, where restrictions would ordinarily flag the payment and block it, sanctions evaders have an incentive to remove the information that would trip the system. |
| 7312cccb5a7f-6dd1-4f6a-9a39-4df6f5f0c28d | Not Translated (0%) | Structuring | Structuring |
| 731382bef08b-aff8-4c7a-a863-d724901495c2 | Not Translated (0%) | Illegal act of splitting cash deposits or withdrawals into smaller amounts, or purchasing monetary instruments, to stay under a currency reporting threshold. | Illegal act of splitting cash deposits or withdrawals into smaller amounts, or purchasing monetary instruments, to stay under a currency reporting threshold. |
| 731482bef08b-aff8-4c7a-a863-d724901495c2 | Not Translated (0%) | The practice might involve dividing a sum of money into lesser quantities and making two or more deposits or withdrawals that add up to the original amount. | The practice might involve dividing a sum of money into lesser quantities and making two or more deposits or withdrawals that add up to the original amount. |
| 731582bef08b-aff8-4c7a-a863-d724901495c2 | Not Translated (0%) | Money launderers use structuring to avoid triggering a filing by a financial institution. | Money launderers use structuring to avoid triggering a filing by a financial institution. |
| 731682bef08b-aff8-4c7a-a863-d724901495c2 | Not Translated (0%) | The technique is common in jurisdictions that have compulsory currency reporting requirements. | The technique is common in jurisdictions that have compulsory currency reporting requirements. |
| 731780fb7420-e1ed-49e7-83c0-d0d448366f95 | Not Translated (0%) | SWIFT message | SWIFT message |
| 731864414990-d486-4013-ac6b-ab72eae3a8c3 | Not Translated (0%) | SWIFT (Society for Worldwide Interbank Financial Telecommunications) provides a messaging network that financial institutions use to securely transmit information and instructions. | SWIFT (Society for Worldwide Interbank Financial Telecommunications) provides a messaging network that financial institutions use to securely transmit information and instructions. |
| 731964414990-d486-4013-ac6b-ab72eae3a8c3 | Not Translated (0%) | The network works through a standardized system of codes in which each member organization is assigned a unique code that has either 8 or 11 characters. | The network works through a standardized system of codes in which each member organization is assigned a unique code that has either 8 or 11 characters. |
| 732064414990-d486-4013-ac6b-ab72eae3a8c3 | Not Translated (0%) | The SWIFT messaging system sends payment orders that must be settled by correspondent accounts that the member institutions have with one another. | The SWIFT messaging system sends payment orders that must be settled by correspondent accounts that the member institutions have with one another. |
| 7321b748beb1-2e29-40f6-aada-13f68f66a422 | Not Translated (0%) | Target match | Target match |
| 73226e06aafd-e5aa-4c11-ac5d-07ef6283a86b | Not Translated (0%) | Identification of a party as matching one named on a sanctions list. | Identification of a party as matching one named on a sanctions list. |
| 73236e06aafd-e5aa-4c11-ac5d-07ef6283a86b | Not Translated (0%) | It is also referred to as a true match and results from sanctions screening. | It is also referred to as a true match and results from sanctions screening. |
| 73242c75499e-c9e0-4c58-b4f8-724c9dbc2446 | Not Translated (0%) | Targeted sanctions | Targeted sanctions |
| 7325d2141cb5-845e-4217-a916-dfddc7c8b6b3 | Not Translated (0%) | Sanctions against a specific target, generally with a goal of a specific outcome. | Sanctions against a specific target, generally with a goal of a specific outcome. |
| 7326d2141cb5-845e-4217-a916-dfddc7c8b6b3 | Not Translated (0%) | Targeted sanctions can be in the form of financial or trade restrictions focused on restricting movement, and they can be applied unilaterally by one country or multilaterally by many countries. | Targeted sanctions can be in the form of financial or trade restrictions focused on restricting movement, and they can be applied unilaterally by one country or multilaterally by many countries. |
| 7327d2141cb5-845e-4217-a916-dfddc7c8b6b3 | Not Translated (0%) | Targeted sanctions are also referred to as smart sanctions. | Targeted sanctions are also referred to as smart sanctions. |
| 73284a078aa6-0233-4781-9ec0-9ab6b4aa53d8 | Not Translated (0%) | Terrorist financing | Terrorist financing |
| 732977bdf904-d627-4d98-824b-af0ff95daaf7 | Not Translated (0%) | The process by which terrorists fund their operations in order to perform terrorist acts. | The process by which terrorists fund their operations in order to perform terrorist acts. |
| 733077bdf904-d627-4d98-824b-af0ff95daaf7 | Not Translated (0%) | There are two primary sources of financing for terrorist activities. | There are two primary sources of financing for terrorist activities. |
| 733177bdf904-d627-4d98-824b-af0ff95daaf7 | Not Translated (0%) | The first involves financial support from countries, organizations, or individuals. | The first involves financial support from countries, organizations, or individuals. |
| 733277bdf904-d627-4d98-824b-af0ff95daaf7 | Not Translated (0%) | The other involves a wide variety of revenue-generating activities, some illicit, including smuggling and credit card fraud. | The other involves a wide variety of revenue-generating activities, some illicit, including smuggling and credit card fraud. |
| 7333c1c09881-bd09-40e2-9f12-c816915cafc4 | Not Translated (0%) | Third line of defense | Third line of defense |
| 73348f20d6a9-2807-4d48-be12-15053571e955 | Not Translated (0%) | The third-line defense within the governance structure of a sanctions compliance program is the internal audit, which involves independent reviews of the controls applied by the first two lines of defense. | The third-line defense within the governance structure of a sanctions compliance program is the internal audit, which involves independent reviews of the controls applied by the first two lines of defense. |
| 73358f20d6a9-2807-4d48-be12-15053571e955 | Not Translated (0%) | It independently evaluates the risk management and controls of the bank through periodic assessments, including the adequacy of the bank’s controls to mitigate the identified risks. | It independently evaluates the risk management and controls of the bank through periodic assessments, including the adequacy of the bank’s controls to mitigate the identified risks. |
| 73368f20d6a9-2807-4d48-be12-15053571e955 | Not Translated (0%) | It also evaluates the effectiveness of the staff’s execution of the controls, the effectiveness of the compliance oversight and quality controls, and the effectiveness of the training. | It also evaluates the effectiveness of the staff’s execution of the controls, the effectiveness of the compliance oversight and quality controls, and the effectiveness of the training. |
| 7337ffaf16d5-a34f-435f-9bdf-e116585d814d | Not Translated (0%) | Threshold calibration | Threshold calibration |
| 7338ed356afc-6e08-49b6-9ef8-7bab30448440 | Not Translated (0%) | A method of adjusting the thresholds within the algorithms in an automated screening tool to match a financial institution’s greatest areas of sanctions risk. | A method of adjusting the thresholds within the algorithms in an automated screening tool to match a financial institution’s greatest areas of sanctions risk. |
| 7339ed356afc-6e08-49b6-9ef8-7bab30448440 | Not Translated (0%) | A threshold is typically described as a percentage, and it controls the generation of alerts. | A threshold is typically described as a percentage, and it controls the generation of alerts. |
| 7340ed356afc-6e08-49b6-9ef8-7bab30448440 | Not Translated (0%) | Threshold calibration reflects the updating and reconfiguration of algorithms based on emerging trends, an institution’s internal investigations, external information, and channels of financial crime activity developing and changing over time. | Threshold calibration reflects the updating and reconfiguration of algorithms based on emerging trends, an institution’s internal investigations, external information, and channels of financial crime activity developing and changing over time. |
| 7341ed356afc-6e08-49b6-9ef8-7bab30448440 | Not Translated (0%) | (See false negative and false positive.) | (See false negative and false positive.) |
| 7342648a5253-03d3-488c-a1f7-4a4ce6522bdf | Not Translated (0%) | Toll gates | Toll gates |
| 7343ec591aaa-5dac-4b73-b8cc-82206e763efb | Not Translated (0%) | The various parties that form the payment chain. | The various parties that form the payment chain. |
| 7344ec591aaa-5dac-4b73-b8cc-82206e763efb | Not Translated (0%) | Payment messages pass through toll gates and can change in the process. | Payment messages pass through toll gates and can change in the process. |
| 7345775aa399-0d80-4c69-b177-db8a78297c61 | Not Translated (0%) | Trade finance | Trade finance |
| 7346f5a584a6-f41a-4b7a-914a-edf2b6bad9f8 | Not Translated (0%) | See letter of credit | See letter of credit |
| 7347339f1ee3-9c1d-40dc-9a40-6e31359e516c | Not Translated (0%) | Transaction monitoring and filtering programs (TMPs) | Transaction monitoring and filtering programs (TMPs) |
| 73481f6d7311-d226-448b-b670-fd3e4e4a0825 | Not Translated (0%) | Programs required of financial institutions under the New York State Department of Financial Services (DFS) Final Rule Part 504 to monitor transactions after their execution for compliance with the Bank Secrecy Act and AML laws and regulations. | Programs required of financial institutions under the New York State Department of Financial Services (DFS) Final Rule Part 504 to monitor transactions after their execution for compliance with the Bank Secrecy Act and AML laws and regulations. |
| 73491f6d7311-d226-448b-b670-fd3e4e4a0825 | Not Translated (0%) | It includes requirements for suspicious activity reporting as well as for monitoring transactions prior to their execution to prevent unlawful transactions with targets of economic sanctions administered by OFAC. | It includes requirements for suspicious activity reporting as well as for monitoring transactions prior to their execution to prevent unlawful transactions with targets of economic sanctions administered by OFAC. |
| 73501f6d7311-d226-448b-b670-fd3e4e4a0825 | Not Translated (0%) | Filtering programs may be manual or automated, and must be reasonably designed for the purpose of interdicting transactions that are prohibited by OFAC. | Filtering programs may be manual or automated, and must be reasonably designed for the purpose of interdicting transactions that are prohibited by OFAC. |
| 7351e1b4292e-1df3-4618-9f0f-c8f2489fdf86 | Not Translated (0%) | Transliteration | Transliteration |
| 73525e749c75-6aed-4ca8-9779-28af21cf6427 | Not Translated (0%) | The conversion of text from one script into another—for example, a document written in Arabic characters that is converted into Cyrillic script. | The conversion of text from one script into another—for example, a document written in Arabic characters that is converted into Cyrillic script. |
| 73535e749c75-6aed-4ca8-9779-28af21cf6427 | Not Translated (0%) | This phenomenon can present a name screening challenge. | This phenomenon can present a name screening challenge. |
| 735496cc5dbe-e712-4b8f-a38c-eba2e15469a5 | Not Translated (0%) | Transshipment | Transshipment |
| 7355911cef0f-1e98-4a4d-83a6-5d0bdd116ff8 | Not Translated (0%) | The shipment of goods through intermediate countries, sometimes involving transfer from one vessel to another, before reaching an intended destination. | The shipment of goods through intermediate countries, sometimes involving transfer from one vessel to another, before reaching an intended destination. |
| 7356911cef0f-1e98-4a4d-83a6-5d0bdd116ff8 | Not Translated (0%) | Transshipment sometimes happens to avoid blockades at the ports of entry for sanctioned regimes or to hide the identity of the country of origin at the destination location. | Transshipment sometimes happens to avoid blockades at the ports of entry for sanctioned regimes or to hide the identity of the country of origin at the destination location. |
| 7357911cef0f-1e98-4a4d-83a6-5d0bdd116ff8 | Not Translated (0%) | Transshipment is prohibited by some governments and entities. | Transshipment is prohibited by some governments and entities. |
| 7358024621a1-000a-4456-bcfa-97d9cc6de8f1 | Not Translated (0%) | Ultimate beneficial owner (UBO) | Ultimate beneficial owner (UBO) |
| 7359598389e6-a7ca-46e2-b8fa-6dc78a01be62 | Not Translated (0%) | See beneficial owner | See beneficial owner |
| 7360562d1d87-ea8a-4e65-872f-ff107b570bcf | Not Translated (0%) | Unilateral sanctions | Unilateral sanctions |
| 7361beb29c91-58d5-402e-9927-7495457dca82 | Not Translated (0%) | These are sanctions imposed by a single country against a targeted entity. | These are sanctions imposed by a single country against a targeted entity. |
| 7362beb29c91-58d5-402e-9927-7495457dca82 | Not Translated (0%) | These are generally considered less effective than multilateral sanctions. | These are generally considered less effective than multilateral sanctions. |
| 7363beb29c91-58d5-402e-9927-7495457dca82 | Not Translated (0%) | Still, they serve to target specific offensive practices on behalf of imposing nations. | Still, they serve to target specific offensive practices on behalf of imposing nations. |
| 7364beb29c91-58d5-402e-9927-7495457dca82 | Not Translated (0%) | As an example, the Magnitsky Act allows for unilateral, global sanctions to be imposed on human rights offenders. | As an example, the Magnitsky Act allows for unilateral, global sanctions to be imposed on human rights offenders. |
| 7365beb29c91-58d5-402e-9927-7495457dca82 | Not Translated (0%) | Assets can be frozen, and offenders may be barred from entering the US. | Assets can be frozen, and offenders may be barred from entering the US. |
| 7366beb29c91-58d5-402e-9927-7495457dca82 | Not Translated (0%) | Another example occurred in the 1980s when Australia autonomously banned shipments of uranium to France. | Another example occurred in the 1980s when Australia autonomously banned shipments of uranium to France. |
| 7367beb29c91-58d5-402e-9927-7495457dca82 | Not Translated (0%) | With few exceptions (for example, the European Union), these are often referred to as autonomous sanctions. | With few exceptions (for example, the European Union), these are often referred to as autonomous sanctions. |
| 73683d049adc-612c-46ec-8c2e-601a620cf297 | Not Translated (0%) | United Nations (UN) | United Nations (UN) |
| 7369b4768bda-f52c-4408-a87d-debc80f77937 | Not Translated (0%) | An international organization that was established in 1945 by 51 countries committed to preserving peace through cooperation and collective security. | An international organization that was established in 1945 by 51 countries committed to preserving peace through cooperation and collective security. |
| 7370b4768bda-f52c-4408-a87d-debc80f77937 | Not Translated (0%) | Today, nearly every nation in the world belongs to the UN. | Today, nearly every nation in the world belongs to the UN. |
| 7371b4768bda-f52c-4408-a87d-debc80f77937 | Not Translated (0%) | The United Nations contributes to the fight against organized crime with initiatives such as the Global Program against Money Laundering (GPML), the key instrument of the UN Office of Drug Control and Crime Prevention in this task. | The United Nations contributes to the fight against organized crime with initiatives such as the Global Program against Money Laundering (GPML), the key instrument of the UN Office of Drug Control and Crime Prevention in this task. |
| 7372b4768bda-f52c-4408-a87d-debc80f77937 | Not Translated (0%) | Through the GPML, the UN helps Member States to introduce legislation against money laundering and to develop mechanisms to combat this crime. | Through the GPML, the UN helps Member States to introduce legislation against money laundering and to develop mechanisms to combat this crime. |
| 7373b4768bda-f52c-4408-a87d-debc80f77937 | Not Translated (0%) | The program encourages anti-money laundering policy development, monitors and analyzes the problems and responses, raises public awareness about money laundering, and acts as a coordinator of joint anti-money laundering initiatives with other international organizations. | The program encourages anti-money laundering policy development, monitors and analyzes the problems and responses, raises public awareness about money laundering, and acts as a coordinator of joint anti-money laundering initiatives with other international organizations. |
| 7374b9ddbcb4-833d-4222-b700-ba5642931a6f | Not Translated (0%) | United Nations Security Council Resolutions (UNSCR) | United Nations Security Council Resolutions (UNSCR) |
| 737544174d03-efce-45c3-977c-0c9efc4a1839 | Not Translated (0%) | Numbered resolutions issued by the United Nations that describe sanctions. | Numbered resolutions issued by the United Nations that describe sanctions. |
| 737644174d03-efce-45c3-977c-0c9efc4a1839 | Not Translated (0%) | An example is UNSCR 1368, unanimously adopted on September 12, 2001, to combat terrorist threats to international peace and security. | An example is UNSCR 1368, unanimously adopted on September 12, 2001, to combat terrorist threats to international peace and security. |
| 73772dab2f9a-c78d-4298-9c2a-cafdef7e384f | Not Translated (0%) | USA PATRIOT Act | USA PATRIOT Act |
| 737800677e71-5cf2-4410-8df7-f227291e9ac3 | Not Translated (0%) | The Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 (Public Law 107-56). | The Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 (Public Law 107-56). |
| 737900677e71-5cf2-4410-8df7-f227291e9ac3 | Not Translated (0%) | Enacted on October 26, 2001, this historic US law brought about momentous changes in the anti-money laundering field, including more than 50 amendments to the Bank Secrecy Act. | Enacted on October 26, 2001, this historic US law brought about momentous changes in the anti-money laundering field, including more than 50 amendments to the Bank Secrecy Act. |
| 738000677e71-5cf2-4410-8df7-f227291e9ac3 | Not Translated (0%) | Title III of the act, the International Money Laundering Abatement and Anti-Terrorist Financing Act of 2001, contains most, but not all, of its anti-money laundering–related provisions. | Title III of the act, the International Money Laundering Abatement and Anti-Terrorist Financing Act of 2001, contains most, but not all, of its anti-money laundering–related provisions. |
| 7381e5e4f106-0838-4ac9-a4f1-e647f5584c66 | Not Translated (0%) | U-turn payment | U-turn payment |
| 738261c0efa3-be17-4175-a4f0-da5d5ee14bfd | Not Translated (0%) | A payment in which a bank or other institution from country A sends a transaction through a bank in country B using an offshore bank. | A payment in which a bank or other institution from country A sends a transaction through a bank in country B using an offshore bank. |
| 738361c0efa3-be17-4175-a4f0-da5d5ee14bfd | Not Translated (0%) | In the financial world, U-turn payments are most commonly known in relation to US sanctions—particularly to those imposed on Iran. | In the financial world, U-turn payments are most commonly known in relation to US sanctions—particularly to those imposed on Iran. |
| 7384686fbe6b-7d69-46e1-84f6-341d9e337d04 | Not Translated (0%) | Weak alias | Weak alias |
| 7385a3ad35cb-62a0-4131-8552-39692f69e304 | Not Translated (0%) | OFAC defines a weak alias, or “weak AKA,” as a broad alias that could generate a number of false hits. | OFAC defines a weak alias, or “weak AKA,” as a broad alias that could generate a number of false hits. |
| 7386ce4b97e3-e980-41bf-93ad-20a7c5eeb306 | Not Translated (0%) | Whitelist | Whitelist |
| 73873188eeb4-a525-45e0-b847-9bb081176c6f | Not Translated (0%) | A list of individuals and entities whose characteristics trigger a hit or alert by an AST (automated screening tool), but who are found not to be a match to a sanctions list. | A list of individuals and entities whose characteristics trigger a hit or alert by an AST (automated screening tool), but who are found not to be a match to a sanctions list. |
| 73883188eeb4-a525-45e0-b847-9bb081176c6f | Not Translated (0%) | Some ASTs allow users to attach supplementary information that supports the conclusion that this person or entity is not a sanctions target and warrants inclusion on the whitelist. | Some ASTs allow users to attach supplementary information that supports the conclusion that this person or entity is not a sanctions target and warrants inclusion on the whitelist. |
| 73895cc6d15d-2021-4566-853c-3a4af5cfe6fe | Not Translated (0%) | Willful blindness | Willful blindness |
| 7390b03a60bb-5fe6-4278-8b3d-f64883dbff51 | Not Translated (0%) | Legal principle that operates in money laundering cases in the US and is defined by courts as the “deliberate avoidance of knowledge of the facts” or “purposeful indifference.” | Legal principle that operates in money laundering cases in the US and is defined by courts as the “deliberate avoidance of knowledge of the facts” or “purposeful indifference.” |
| 7391b03a60bb-5fe6-4278-8b3d-f64883dbff51 | Not Translated (0%) | Courts have held that willful blindness is the equivalent of actual knowledge of the illegal source of funds or of the intentions of a customer in a money laundering transaction. | Courts have held that willful blindness is the equivalent of actual knowledge of the illegal source of funds or of the intentions of a customer in a money laundering transaction. |
| 73920003ff85-e057-4336-90e4-626e4e13747a | Not Translated (0%) | Wire transfer | Wire transfer |
| 7393b63215ed-da63-4e80-a817-a098010a7119 | Not Translated (0%) | Electronic transmission of funds among financial institutions on behalf of themselves or their customers. | Electronic transmission of funds among financial institutions on behalf of themselves or their customers. |
| 7394b63215ed-da63-4e80-a817-a098010a7119 | Not Translated (0%) | Wire transfers are financial vehicles covered by the regulatory requirements of many countries in the anti-money laundering effort. | Wire transfers are financial vehicles covered by the regulatory requirements of many countries in the anti-money laundering effort. |
| 73954b75bb0a-72b4-4bf4-aa6f-ed9f5636c82e | Not Translated (0%) | Sanctions Evasion Techniques | Sanctions Evasion Techniques |
| 7396039fbe70-388b-4e1c-b83c-957d82498297 | Not Translated (0%) | Governance and Enforcement | Governance and Enforcement |
| 7397a6d5c52c-5d85-429d-b92d-78fa5dd57e60 | Not Translated (0%) | CGSS - Glossary of Terms | CGSS - Glossary of Terms |
| 7398922983e1-ed43-47f3-b50e-647cfff55eea | Not Translated (0%) | Preface | Preface |
| 73998e5b3889-67f1-4eaf-a2c3-0fe876b19529 | Not Translated (0%) | Sanctions Investigations and Assets Freezing | Sanctions Investigations and Assets Freezing |
| 740008efb895-7a08-4686-8d4c-dcbe1eef8a68 | Not Translated (0%) | Sanctions Screening | Sanctions Screening |
| 74012621a0b6-9cac-438e-9b74-746eb91c99e6 | Not Translated (0%) | Sanctions Due Diligence | Sanctions Due Diligence |
| 740276835d25-20ae-4bfd-9c49-022a17f53871 | Not Translated (0%) | Course Review | Course Review |
| 740356f7fb39-ddbb-48aa-9df4-8603c02822f4 | Not Translated (0%) | ACAMS-DesignData | ACAMS-DesignData |
| 74049f2ebcaa-6e14-4531-b71e-c66571c0a6d3 | Not Translated (0%) | Guidance Documents and Reference Material | Guidance Documents and Reference Material |
| 74055c44c42d-3756-4feb-b780-c24a6faa1412 | Not Translated (0%) | Final Rule Part 504 | Final Rule Part 504 |
| 7406ebf65dcc-ff87-4ee2-b86f-66f20754591e | Not Translated (0%) | Comprehensive sanctions | Comprehensive sanctions |
| 74077a841346-02bd-4c54-8443-9e69c32eada3 | Not Translated (0%) | Scope of permitted activities | Scope of permitted activities |
| 740861b358ff-656c-4ced-894e-c94575003b46 | Not Translated (0%) | Weak alias | Weak alias |
| 740931009cd9-eaaa-4cf8-89c4-c271cd14b646 | Not Translated (0%) | Restrictive measures | Restrictive measures |
| 741057199eef-2498-4386-97fc-9fac5d6146cd | Not Translated (0%) | Dollar clearing | Dollar clearing |
| 7411c910c7e1-9d17-4ee7-93be-c95a2953bc99 | Not Translated (0%) | Identifying and Blocking (or Freezing) Assets | Identifying and Blocking (or Freezing) Assets |
| 7412a5f6e259-6707-4f4e-a6ce-3ab2a1679ad0 | Not Translated (0%) | Sanctions regime | Sanctions regime |
| 741387b8b4eb-5adc-44f2-bc1f-4e5f52ef7f2a | Not Translated (0%) | Database, third-party | Database, third-party |
| 7414d2361e64-900b-4fdd-846f-681f6e3a07ac | Not Translated (0%) | Multilateral sanctions | Multilateral sanctions |
| 741587e68fb5-16d4-447b-92bf-844699ec6c66 | Not Translated (0%) | Sources, primary | Sources, primary |
| 741648870cd8-93ee-4628-88c3-ae8553b600be | Not Translated (0%) | Bureau of Industry and Security (BIS) | Bureau of Industry and Security (BIS) |
| 7417027f825b-0353-4c04-8fce-a5b52ffdaff2 | Not Translated (0%) | Asset forfeiture | Asset forfeiture |
| 741818138193-b332-4348-8bc4-ed2475d691db | Not Translated (0%) | Jurisdiction of residence | Jurisdiction of residence |
| 7419be8bc987-314a-463d-8bf6-393e4d0f4e33 | Not Translated (0%) | Threshold calibration | Threshold calibration |
| 742081a22051-0303-4e1a-87e4-12a1b52944db | Not Translated (0%) | Asset mingling | Asset mingling |
| 74214067cd37-d3b5-4774-a97c-8faa03242c8b | Not Translated (0%) | Embargo | Embargo |
| 7422411f0a9e-4762-4f07-9e95-ba63e92ecc94 | Not Translated (0%) | Inherent risk | Inherent risk |
| 74236ffbc823-41bd-40be-b6b0-37d9de2b93d6 | Not Translated (0%) | Exemption | Exemption |
| 74242eaeaad0-6c6a-4cf6-b561-329ba2f17892 | Not Translated (0%) | Name Screening | Name Screening |
| 742578b1ab7d-ffb5-4c25-ad3c-804cf714683f | Not Translated (0%) | Economic sanctions | Economic sanctions |
| 7426b69aa60a-6bb5-4441-b7eb-6726cc901a0d | Not Translated (0%) | Register, corporate | Register, corporate |
| 742756e6f701-15ea-4458-a2a3-57a088b3ae1b | Not Translated (0%) | Risk appetite | Risk appetite |
| 7428bdf38ba0-e699-402d-85a6-b4b4673c8167 | Not Translated (0%) | Block | Block |
| 7429be011e7c-143d-4286-a922-efc79681de87 | Not Translated (0%) | Free trade zone (FTZ) | Free trade zone (FTZ) |
| 7430356f335c-a7cc-4363-a0d2-5a91f283f2e6 | Not Translated (0%) | Financial Crimes Enforcement Network (FinCEN) | Financial Crimes Enforcement Network (FinCEN) |
| 7431811d83b3-aeb0-44f0-8137-ceb8865b6e72 | Not Translated (0%) | Identifier | Identifier |
| 7432d5c0637b-0071-4629-922c-d577c787486c | Not Translated (0%) | Structuring | Structuring |
| 7433f2cecd92-54e8-4945-9551-c59354ad87c2 | Not Translated (0%) | Information Technology | Information Technology |
| 74343e5169b1-5095-421c-acaa-078c0b43081b | Not Translated (0%) | Review Questions | Review Questions |
| 7435451a0924-7a29-413a-9a7f-af260a83f0ff | Not Translated (0%) | Sanctions list | Sanctions list |
| 7436c27ba3d5-c3c0-45ee-8472-60617e68313f | Not Translated (0%) | Asset blocking | Asset blocking |
| 7437e6ea34a2-c7d5-43f7-a604-295ec2892b9d | Not Translated (0%) | First line of defense | First line of defense |
| 743824553c59-b30f-446e-a7c4-465938322466 | Not Translated (0%) | Third line of defense | Third line of defense |
| 7439db0290eb-7cf0-408c-918f-87f8e76cafa8 | Not Translated (0%) | Dealing in funds | Dealing in funds |
| 7440128f0ec6-0b4d-47f8-8ab4-6ba579d95a02 | Not Translated (0%) | Autonomous sanctions | Autonomous sanctions |
| 74410af88221-ca92-4af8-bfb8-92da8dcb326b | Not Translated (0%) | Transshipment | Transshipment |
| 744250efb21c-0603-4415-82f1-6a073cda2b65 | Not Translated (0%) | False negative | False negative |
| 7443f0980976-2172-4018-9814-fffb22b0e406 | Not Translated (0%) | Asset seizure | Asset seizure |
| 74442461bdd9-a1d7-4471-a4ef-e6468a04d124 | Not Translated (0%) | Letter of credit | Letter of credit |
| 74452ac7787f-425f-4ff8-a7c0-25c901a14e60 | Not Translated (0%) | Electronic funds transfer (EFT) | Electronic funds transfer (EFT) |
| 74466ed7122e-ca87-4e08-bf52-1b85df45ae4f | Not Translated (0%) | Sanctions compliance program (SCP) | Sanctions compliance program (SCP) |
| 74471fdbe4b8-3b78-4761-b8ab-2f27e06a8c82 | Not Translated (0%) | Contributors | Contributors |
| 74484d5296de-1367-4f22-8183-517c7d109617 | Not Translated (0%) | Investigation | Investigation |
| 7449369c1f09-c197-43a8-b19b-5289146aabc0 | Not Translated (0%) | Compliance | Compliance |
| 7450f7c66ec3-8eea-4206-ad52-2976349e8a06 | Not Translated (0%) | Willful blindness | Willful blindness |
| 745120ff7c45-43c1-4147-be44-6c7250b962cf | Not Translated (0%) | Office of Foreign Assets Control (OFAC) | Office of Foreign Assets Control (OFAC) |
| 74528314682c-12ba-466f-be07-fdc6c690b57e | Not Translated (0%) | Boycott | Boycott |
| 7453b0e16488-1f01-4d12-8f1f-b77742d14359 | Not Translated (0%) | About ACAMS | About ACAMS |
| 745445eddafa-a01e-4d6b-b827-4ddabd30982a | Not Translated (0%) | Stripping | Stripping |
| 74554ffbebb9-5e59-4914-b382-c979e411ba89 | Not Translated (0%) | Evasion Methods: | Evasion Methods: |
| 74564ffbebb9-5e59-4914-b382-c979e411ba89 | Not Translated (0%) | Common Techniques | Common Techniques |
| 74572a9b928d-b60e-4864-b7a1-051c1c1a744d | Not Translated (0%) | Name screening | Name screening |
| 745802d79c6f-704a-4783-830d-22a42902d05b | Not Translated (0%) | Event-triggered monitoring | Event-triggered monitoring |
| 74591c83bea3-9469-46de-b387-eba97af6c546 | Not Translated (0%) | String matching | String matching |
| 7460a2a3fb35-83e2-4d91-ae1a-e7ef3069f273 | Not Translated (0%) | Toll gates | Toll gates |
| 746103e81571-ed05-4dcb-8d86-f0014cfa07e6 | Not Translated (0%) | Batch screening | Batch screening |
| 7462ce7154c4-5f96-4451-873d-ba600fe5a586 | Not Translated (0%) | Whitelist | Whitelist |
| 74636c37728c-343c-4e8e-a4aa-8b348e043608 | Not Translated (0%) | Sanctions compliance | Sanctions compliance |
| 746454da0140-1d40-4606-aebd-f0d71069fa3d | Not Translated (0%) | Strict liability | Strict liability |
| 746569800ff0-fb2a-4f78-8fc8-7a58c70b38be | Not Translated (0%) | Dilution of sanctioned ownership | Dilution of sanctioned ownership |
| 7466a881f157-cb3f-4041-9718-0c2ae95e7f31 | Not Translated (0%) | Selective sanctions | Selective sanctions |
| 7467cda2dad2-5f0f-454d-ad71-7506f669f991 | Not Translated (0%) | Decision tree | Decision tree |
| 7468609f6156-6478-472a-8761-c778b82bc64b | Not Translated (0%) | Unilateral sanctions | Unilateral sanctions |
| 746916dbf33a-3064-40dc-8e7a-372d403aee11 | Not Translated (0%) | Sanctions evasion | Sanctions evasion |
| 747041fd3663-c964-4ce0-9987-cd758ba188e9 | Not Translated (0%) | Look-back (or look-back review) | Look-back (or look-back review) |
| 7471c613a0b4-b9b0-4d9f-be9d-2bb82364884a | Not Translated (0%) | Non-Proliferation Treaty (NPT) | Non-Proliferation Treaty (NPT) |
| 74723fb27e42-c0a1-4876-a07f-87740f6656e2 | Not Translated (0%) | Facilitation | Facilitation |
| 74735a114922-a40a-4e21-898d-f7795c72cb47 | Not Translated (0%) | Payment screening | Payment screening |
| 747429f64c68-5c40-4cfb-9727-8de4a1e932e0 | Not Translated (0%) | Denied Persons List (DPL) | Denied Persons List (DPL) |
| 7475556d10f0-0e21-438e-8674-5e94f2d53bd9 | Not Translated (0%) | Reviewing Relevant Sources of Information | Reviewing Relevant Sources of Information |
| 7476bc470f90-a381-41c4-b1e4-fb5a900b26f6 | Not Translated (0%) | Target match | Target match |
| 74770070c026-3719-4ba2-a110-84778825b0de | Not Translated (0%) | Ultimate beneficial owner (UBO) | Ultimate beneficial owner (UBO) |
| 7478b4ccd040-cc45-4667-ab67-86dd0cee4b51 | Not Translated (0%) | Regulatory Matters | Regulatory Matters |
| 7479da86b926-acfd-4e24-866c-039dd866c23c | Not Translated (0%) | Extraterritorial jurisdiction | Extraterritorial jurisdiction |
| 7480414db21e-c869-4bbc-bf24-8db6fa958bae | Not Translated (0%) | Mutual evaluation report (MER) | Mutual evaluation report (MER) |
| 7481485c46ee-cb89-4100-a985-15adc4c91ad1 | Not Translated (0%) | Dual control | Dual control |
| 74820c2cc5af-255f-45b5-82ec-c52fbace22c9 | Not Translated (0%) | Romanization | Romanization |
| 7483488cfb86-816c-413e-b961-1fd384e4db89 | Not Translated (0%) | Sanctions compliance officer (SCO) | Sanctions compliance officer (SCO) |
| 74842ce03082-8d31-4305-813f-30e337604966 | Not Translated (0%) | Due diligence | Due diligence |
| 7485d68ee644-6913-4171-a169-7308a5b9db54 | Not Translated (0%) | Automated screening tool (AST) | Automated screening tool (AST) |
| 74868c61a962-e3cd-4761-a7d5-894b0340d6aa | Not Translated (0%) | Delisting | Delisting |
| 748744a1c6c7-7a35-43b5-9668-1fb040a2a69d | Not Translated (0%) | USA PATRIOT Act | USA PATRIOT Act |
| 74887639116b-6ffe-430e-9ffb-5a7c8da69f5a | Not Translated (0%) | Alert | Alert |
| 7489c4977231-8ba5-4b81-8075-5edc3b487cd7 | Not Translated (0%) | Limited Liability Company (LLC) | Limited Liability Company (LLC) |
| 7490febbe1e0-d6b6-4eb9-894c-a3df886789e7 | Not Translated (0%) | Perform Sanctions Due Diligence | Perform Sanctions Due Diligence |
| 74916d85d889-4112-4284-9a01-734597bf83bd | Not Translated (0%) | Smart sanctions | Smart sanctions |
| 74920575b7da-a3e1-4554-85a9-7c4771ab1191 | Not Translated (0%) | Dual-use goods | Dual-use goods |
| 7493c38f5597-839b-4fe7-b207-43820e5a669c | Not Translated (0%) | Governance | Governance |
| 7494fff1c4a4-40a7-4a8f-91bd-f95734eacbad | Not Translated (0%) | Asset | Asset |
| 749587622816-49b8-4d25-970f-8c33f718529d | Not Translated (0%) | Sources, secondary | Sources, secondary |
| 7496ba1cdbd4-38a2-4397-836a-884f47177dcc | Not Translated (0%) | Customer relationship | Customer relationship |
| 7497ec2d2e5b-6046-43fa-8fd7-4b1c4b80b27b | Not Translated (0%) | U-turn payment | U-turn payment |
| 7498354ed048-f0b1-4a42-bf34-3d076c005a96 | Not Translated (0%) | Partial match | Partial match |
| 74992bc09dac-afb3-4db0-87b4-bbd3fa480047 | Not Translated (0%) | Respondent bank | Respondent bank |
| 7500afb76efb-5ea4-4d3b-b0f2-5c036e573fb9 | Not Translated (0%) | Fuzzy logic | Fuzzy logic |
| 7501516b195f-5524-4699-b18f-853b7a832577 | Not Translated (0%) | Blockade | Blockade |
| 750256604984-d328-4847-a377-d20d42ce0afa | Not Translated (0%) | Trade finance | Trade finance |
| 75030f947b7b-d5d9-4868-9ac5-218189b9367b | Not Translated (0%) | Bill of exchange | Bill of exchange |
| 7504da6d2bbb-2d8d-4fea-a0df-a5ba046c4eb0 | Not Translated (0%) | Straw man | Straw man |
| 7505275e84d3-251c-4b39-b46c-034815d47ca4 | Not Translated (0%) | Reasonable cause (to suspect) | Reasonable cause (to suspect) |
| 7506104239d6-c0f4-4987-8fcb-86d88984374b | Not Translated (0%) | Office of the Superintendent of Financial Institutions (OSFI) | Office of the Superintendent of Financial Institutions (OSFI) |
| 7507ac4036ad-062b-400f-946b-c27369276db2 | Not Translated (0%) | False positive | False positive |
| 7508ba135252-953b-4c05-94c0-31c0528f15d3 | Not Translated (0%) | Control effectiveness | Control effectiveness |
| 750957fe7740-e978-4bc3-931e-6430102b5f79 | Not Translated (0%) | Money laundering | Money laundering |
| 7510a71815f3-452d-452d-a09d-844e77657c34 | Not Translated (0%) | External evasion | External evasion |
| 75111990dec1-114d-46b8-b173-321d2f9aad85 | Not Translated (0%) | Asset confiscation | Asset confiscation |
| 751265566515-fb95-426c-b2f0-2295a92e7777 | Not Translated (0%) | Payments, cross border | Payments, cross border |
| 75134e664c4f-ea5e-4f95-b358-8cedcbc3bb74 | Not Translated (0%) | Front company | Front company |
| 751471151dbd-afe0-47d2-928e-a58e8fc4d4ce | Not Translated (0%) | Know your customer (KYC) | Know your customer (KYC) |
| 7515ec1173c7-5f8e-4175-b3ae-403b26ae2a2e | Not Translated (0%) | Asset structuring | Asset structuring |
| 751674181779-5d2c-4302-85d7-bf7db1811977 | Not Translated (0%) | Introduction and Study Recommendations | Introduction and Study Recommendations |
| 7517eb94dd04-83fe-4a18-b3de-4b7cdb1498fa | Not Translated (0%) | Nominee director or shareholder | Nominee director or shareholder |
| 75181eb04370-6250-40b0-aeb3-ae014a154a42 | Not Translated (0%) | Sanctions | Sanctions |
| 7519fffee5b5-568e-45d7-8b4c-5a6c8d86053b | Not Translated (0%) | Counterparty | Counterparty |
| 7520711c3c9d-0390-4ffb-920b-0980a559de56 | Not Translated (0%) | License | License |
| 7521e1e38cf8-0ee9-4635-a390-97619ffffa97 | Not Translated (0%) | Screening tools | Screening tools |
| 752210f6c011-13c9-4f50-9ed8-6a6d6a442f73 | Not Translated (0%) | Hit | Hit |
| 7523c1727354-e75d-4c89-ac7e-d4b3f93f545e | Not Translated (0%) | Customer due diligence (CDD) | Customer due diligence (CDD) |
| 7524f9aeeb44-746c-47c0-a989-7d173deb741d | Not Translated (0%) | Nesting | Nesting |
| 75255dc7aa97-5542-4383-b1b8-299bb84c987d | Not Translated (0%) | Sanctions Screening | Sanctions Screening |
| 7526eedb1b47-3c11-4129-a3f3-f9f2bfc5e804 | Not Translated (0%) | Risk assessment | Risk assessment |
| 7527f9d3c408-4fa5-4dae-83c0-ff06a2de6159 | Not Translated (0%) | Kleptocrat | Kleptocrat |
| 75282c8b9ea7-41f5-4d86-aa65-14a4fe89bcbf | Not Translated (0%) | Export Administration Regulations (EAR) | Export Administration Regulations (EAR) |
| 7529ee5ae23e-c4c8-447e-a39d-8f25014b144f | Not Translated (0%) | Foreign sanctions evader (FSE) | Foreign sanctions evader (FSE) |
| 75308c8bbf08-7841-4eee-9408-4668f58b9291 | Not Translated (0%) | Evasion | Evasion |
| 7531a067208d-20f1-41b2-b6ce-0feeebb30792 | Not Translated (0%) | Red flag | Red flag |
| 753262b90dfe-5490-4ba7-a9d4-24ca2475adcf | Not Translated (0%) | Mirror trades | Mirror trades |
| 75331b6231a2-5efe-45a0-8993-89a14032a8de | Not Translated (0%) | Concealment of Beneficial Ownership | Concealment of Beneficial Ownership |
| 75341aeaa783-f175-4154-b847-640652d0df0f | Not Translated (0%) | Cross border | Cross border |
| 7535a244d410-8d15-476e-a4ed-953de325ef32 | Not Translated (0%) | Specially Designated Nationals and Blocked Persons list (SDN list) | Specially Designated Nationals and Blocked Persons list (SDN list) |
| 753678952e2f-5121-4eab-9322-2b275eb40250 | Not Translated (0%) | Globalization | Globalization |
| 7537e759881f-3431-4ba8-8c4f-21876ad1a0dc | Not Translated (0%) | Isolation company | Isolation company |
| 7538e42dea88-570b-46a6-9e0f-2370776cdcdd | Not Translated (0%) | Nested account | Nested account |
| 75397ca1129a-b847-4b2e-9bd2-a560e8d88fc3 | Not Translated (0%) | Targeted sanctions | Targeted sanctions |
| 75407f34b9b4-081b-4f65-a029-7df9255fc4f2 | Not Translated (0%) | Governance and Enforcement | Governance and Enforcement |
| 754113065ed1-1011-4508-abe1-b7bb0e211db5 | Not Translated (0%) | Shelf company | Shelf company |
| 7542b47b7757-5d2e-46ed-96c6-ae9f36f6b9b5 | Not Translated (0%) | Simple checks | Simple checks |
| 754347ec8475-01f4-4e5a-ab7c-962029df5b9d | Not Translated (0%) | Wire transfer | Wire transfer |
| 75443ebb8296-6adc-4448-8451-ac7dbc68bc20 | Not Translated (0%) | Consolidation of goods | Consolidation of goods |
| 7545b2421d80-ff3f-4426-8701-797605ba9ba0 | Not Translated (0%) | Inequalities list | Inequalities list |
| 75463ec49823-3b4d-437d-b066-6cf0d50741d2 | Not Translated (0%) | Payment Screening | Payment Screening |
| 75478624ab2d-35ed-4244-8a58-69aab8bf32b7 | Not Translated (0%) | Correspondent banking | Correspondent banking |
| 75485fbc6729-fd74-4211-9ffe-b5252de2e58d | Not Translated (0%) | United Nations Security Council Resolutions (UNSCR) | United Nations Security Council Resolutions (UNSCR) |
| 7549f29995bb-abe8-4bb6-ad0e-ffa42d95cab8 | Not Translated (0%) | Exclusions list | Exclusions list |
| 7550d4895a85-4743-42cc-8bb3-722b43564046 | Not Translated (0%) | Internal evasion | Internal evasion |
| 755102293884-3700-491f-9d21-408a9e860171 | Not Translated (0%) | Asset flight | Asset flight |
| 755293a4dfc4-e599-44d5-97a5-c912e01aef19 | Not Translated (0%) | Sham divestment | Sham divestment |
| 7553aba93a89-ef06-48ce-9ab1-f37e5948a5d9 | Not Translated (0%) | Human rights | Human rights |
| 7554d7ac68a7-980c-44d6-9db6-bdb87c91f2f6 | Not Translated (0%) | Real Time Gross Settlement Systems (RTGS) | Real Time Gross Settlement Systems (RTGS) |
| 75557829c2ca-91b4-40c9-89e9-650e5cdd4b84 | Not Translated (0%) | Transliteration | Transliteration |
| 75562b9cf11c-d17a-465a-854d-2ca84b4200bb | Not Translated (0%) | Shell company | Shell company |
| 75579c3ec708-50f0-44c3-a639-1df18df2ca4f | Not Translated (0%) | Sectoral sanction | Sectoral sanction |
| 75585126be50-7094-4007-aea2-4e0c11bd3cfa | Not Translated (0%) | Terrorist financing | Terrorist financing |
| 7559c5b56223-3190-4cc5-b88a-9f3097f8a51a | Not Translated (0%) | Joint Comprehensive Plan of Action (JCPOA) | Joint Comprehensive Plan of Action (JCPOA) |
| 7560c2677794-e093-44c1-a959-91454f541c70 | Not Translated (0%) | Blacklist | Blacklist |
| 75612678b278-f704-4a9a-b149-27aa0abd1d62 | Not Translated (0%) | Sectoral Sanctions Identification list (SSI list) | Sectoral Sanctions Identification list (SSI list) |
| 756259ee8dc9-5820-48a4-96e0-0d082488cab3 | Not Translated (0%) | United Nations (UN) | United Nations (UN) |
| 7563e904ab80-db55-4de3-ba29-b8ddd8ae283f | Not Translated (0%) | Reputational risk | Reputational risk |
| 7564db10d8f8-40ee-43c2-8fb7-7818d6c1eae0 | Not Translated (0%) | Pass-through sanctions risk | Pass-through sanctions risk |
| 7565d405f004-40f8-4a86-82a2-f20857779013 | Not Translated (0%) | Transaction monitoring and filtering programs (TMPs) | Transaction monitoring and filtering programs (TMPs) |
| 7566a4035ab9-40cf-4186-a90c-4d6cea7cdf47 | Not Translated (0%) | Mandatory sanctions lists | Mandatory sanctions lists |
| 756746f8c828-3ba2-46d1-ae07-1c68b90145b6 | Not Translated (0%) | Delivery channels | Delivery channels |
| 7568c9bcbf78-433e-4d8b-bc88-ab3d746d8226 | Not Translated (0%) | Embezzlement | Embezzlement |
| 7569f42cb6cd-80ee-4e55-bdbf-8c53a4e4cd27 | Not Translated (0%) | Recommendations for Studying for the Exam | Recommendations for Studying for the Exam |
| 75705b4eb603-7ca7-4e93-bbb2-e3ba56172d65 | Not Translated (0%) | Jurisdiction of citizenship | Jurisdiction of citizenship |
| 7571be90b749-52c9-45e6-bcc2-1759b1bd847b | Not Translated (0%) | Financial Action Task Force (FATF) | Financial Action Task Force (FATF) |
| 757240fd46f3-3e22-4423-9212-069bfd95e624 | Not Translated (0%) | Trade Activity Screening | Trade Activity Screening |
| 75738dc764ec-a61c-464e-b1d9-5dfa8072164c | Not Translated (0%) | End-user certificate | End-user certificate |
| 75747f470608-5e69-4477-a0dc-91f0c0b597d4 | Not Translated (0%) | SWIFT message | SWIFT message |
| 75757a03b374-6e06-4c1f-bbcc-67d0cbfc6403 | Not Translated (0%) | Scope of licensing | Scope of licensing |
| 757647376df4-c116-4e90-b4e5-5f26270de91f | Not Translated (0%) | Greylist | Greylist |
| 757769b6f1ab-e9d2-473e-8646-2f85f5b83fbb | Not Translated (0%) | Sanctions due diligence (SDD) | Sanctions due diligence (SDD) |
| 7578f1c44fff-fcf5-4896-807b-30ddefe8a6a3 | Not Translated (0%) | Asset freezing | Asset freezing |
| 7579218ceb05-7c75-4772-a8f1-f0109ba8d29a | Not Translated (0%) | Conducting Investigations | Conducting Investigations |
| 758027d394a5-ac9c-457f-bb58-a1d4feb456ce | Not Translated (0%) | Second line of defense | Second line of defense |
| 75818a970bb6-b9d8-4374-b0ad-46cc395781f4 | Not Translated (0%) | Reporting requirements, initial and periodic | Reporting requirements, initial and periodic |
| 7582c3c65abe-960a-4654-af57-c2edbb4538a6 | Not Translated (0%) | Naming conventions | Naming conventions |
| 75831ea27471-0c2e-4e69-8e20-75db4c7e05be | Not Translated (0%) | Bill of lading | Bill of lading |
| 7584b94997de-024a-440a-9b95-18b2746ba025 | Not Translated (0%) | Back-to-back letters of credit | Back-to-back letters of credit |
| 7585567c402b-2b5a-4217-993a-550310cdd275 | Not Translated (0%) | Beneficial owner | Beneficial owner |
| 7586ecbfc5da-49ac-4bba-8fcc-f0940da2bea3 | Not Translated (0%) | Export Control Joint Unit (ECJU) | Export Control Joint Unit (ECJU) |
| 758718efe86f-25e8-49d0-9e00-2912cad054df | Not Translated (0%) | Identification of Assets | Identification of Assets |
| 7588bf321531-b2be-4af8-9831-41779fb2ddc9 | Not Translated (0%) | Two Types of Evasion | Two Types of Evasion |
| 7589cd4ca987-2364-46e7-8d88-ec6f11aa8e7e | Not Translated (0%) | Automated Screening Tools | Automated Screening Tools |
| 75901b1302be-4c13-4921-aabe-75fce062922f | Not Translated (0%) | The Screening Process, Procedures, Important Controls, and Tools | The Screening Process, Procedures, Important Controls, and Tools |
| 7591611abee2-2aa1-4854-9848-a14711b90b42 | Not Translated (0%) | Customer Relationships | Customer Relationships |
| 75924295aa00-3b20-45b0-babb-a3d0af2bbf69 | Not Translated (0%) | History of Sanctions | History of Sanctions |
| 75936c1e6378-1150-423d-83e5-9ba4ad81dd91 | Not Translated (0%) | Governance | Governance |
| 75941dc9cb7c-9c65-4f13-8575-c2a2b59442d8 | Not Translated (0%) | Introduction | Introduction |
| 7595c33f5735-1653-46c8-b0d0-85d933aa50d0 | Not Translated (0%) | Romanization | Romanization |
| 75962112e4e2-16d4-4e82-b84c-045fbef9e52e | Not Translated (0%) | Name Screening vs. Payment Screening | Name Screening vs. Payment Screening |
| 759712214e22-020b-48e3-ae8a-3e04e9d7efd0 | Not Translated (0%) | Complex Corporate Ownership Arrangements | Complex Corporate Ownership Arrangements |
| 75987f5b6f95-2e31-4cc2-80ac-b1ebafaa4e84 | Not Translated (0%) | Know Your Customer | Know Your Customer |
| 7599c02da7b5-5982-4ff0-b363-8cd8b74b4145 | Not Translated (0%) | The Investigation Process | The Investigation Process |
| 7600db895009-a15b-4294-8c6f-8ec332245146 | Not Translated (0%) | Module Review: | Module Review: |
| 7601db895009-a15b-4294-8c6f-8ec332245146 | Not Translated (0%) | Sanctions Screening | Sanctions Screening |
| 7602e47a7d42-8b27-4595-8a4b-991f2b05fafa | Not Translated (0%) | Using Different Names | Using Different Names |
| 76038775d1e2-96b9-4f12-a50e-44680d5e9eed | Not Translated (0%) | Challenges | Challenges |
| 760459f12896-3b98-4841-bf22-6d81b14c904b | Not Translated (0%) | Consequences for Noncompliance | Consequences for Noncompliance |
| 76053decdc9d-67e4-4cfb-81a2-883afcce9f7d | Not Translated (0%) | Challenges | Challenges |
| 7606e79fef62-d1c2-4eca-a274-37d10dddf51d | Not Translated (0%) | Payments and Transactions | Payments and Transactions |
| 7607cc07eb7f-6437-44b7-8ccb-cba60a8c3e1d | Not Translated (0%) | Know Your High-Risk Lines of Business | Know Your High-Risk Lines of Business |
| 760817bda3b9-d965-4757-839c-fbc01d06e3ca | Not Translated (0%) | Scenarios | Scenarios |
| 7609c29d0a91-07ba-4f95-a029-36bbef44f868 | Not Translated (0%) | Solving Name and Payment Screening Challenges | Solving Name and Payment Screening Challenges |
| 76106e307b36-1b9a-4ef5-86dd-b556337142e2 | Not Translated (0%) | Separating Messages | Separating Messages |
| 7611de215547-8f02-4a4d-a7c6-9c3fd3e21d12 | Not Translated (0%) | Data, Data Flows, and Data Validation | Data, Data Flows, and Data Validation |
| 7612e75565dd-f274-4c7f-8ccc-1101b540ecbe | Not Translated (0%) | Screening Targets | Screening Targets |
| 7613453d04ac-622f-40b4-a115-03c2d93d2f96 | Not Translated (0%) | Module Review: | Module Review: |
| 7614453d04ac-622f-40b4-a115-03c2d93d2f96 | Not Translated (0%) | Governance and Enforcement | Governance and Enforcement |
| 7615b5ea85e8-de9a-401c-8113-54d779a4aed1 | Not Translated (0%) | Dilution of Sanctioned Ownership | Dilution of Sanctioned Ownership |
| 7616e6805b68-09f1-48de-ab7a-1a336fc82a78 | Not Translated (0%) | Module Review: | Module Review: |
| 7617e6805b68-09f1-48de-ab7a-1a336fc82a78 | Not Translated (0%) | Sanctions Investigations and Assets Freezing | Sanctions Investigations and Assets Freezing |
| 7618ae073ec5-8bf2-43ba-a0e7-be744c61168a | Not Translated (0%) | Module Review: | Module Review: |
| 7619ae073ec5-8bf2-43ba-a0e7-be744c61168a | Not Translated (0%) | Sanctions Due Diligence | Sanctions Due Diligence |
| 7620f1409feb-8b71-4fc9-b552-f05e0079c683 | Not Translated (0%) | Course Review: | Course Review: |
| 7621f1409feb-8b71-4fc9-b552-f05e0079c683 | Not Translated (0%) | Answers | Answers |
| 7622cea6c405-e09e-497b-80a2-61af897e39a1 | Not Translated (0%) | Naming Conventions | Naming Conventions |
| 7623b62bf647-1529-4960-a7c6-1c99d29dc46a | Not Translated (0%) | Evasion Attempts by Internal Staff | Evasion Attempts by Internal Staff |
| 7624f96f1c68-d3a8-411e-8172-a143b1e45b52 | Not Translated (0%) | Proxies or “Front” Parties | Proxies or “Front” Parties |
| 7625869f6c72-9249-4d9f-8525-8801cc4ba309 | Not Translated (0%) | Delisting | Delisting |
| 7626f34565af-ab1c-4093-9d21-4ed358636f72 | Not Translated (0%) | Approach | Approach |
| 7627553eed0e-2e23-44ba-8ff4-1ea73af57392 | Not Translated (0%) | Know the Ultimate Beneficial Owner | Know the Ultimate Beneficial Owner |
| 762832ac0adc-6971-4c46-a0be-1866021588e3 | Not Translated (0%) | Who Imposes Sanctions? | Who Imposes Sanctions? |
| 762930721f9d-4645-4112-942c-33468e9eaf52 | Not Translated (0%) | Incorporating Sanctions Compliance into Compliance Programs, Risk Assessment, and Employee Training | Incorporating Sanctions Compliance into Compliance Programs, Risk Assessment, and Employee Training |
| 7630b6a5997f-1eb7-4a11-a2fe-d18b12ea4d63 | Not Translated (0%) | Operational Controls | Operational Controls |
| 7631fef99890-6694-4efc-a7f0-501cad08918d | Not Translated (0%) | Key Risk Areas | Key Risk Areas |
| 763238e89d76-026f-4965-b03c-60990bb7b99b | Not Translated (0%) | Sources | Sources |
| 7633687a6dcb-295a-4ce8-bd32-02952dd88f99 | Not Translated (0%) | Management and Reporting Obligations | Management and Reporting Obligations |
| 7634d38efd94-d986-451c-bec3-c4b8e643e053 | Not Translated (0%) | Reporting Requirements for Frozen Assets | Reporting Requirements for Frozen Assets |
| 7635893f59c4-917f-4040-8387-1ec6e0be276f | Not Translated (0%) | Influential Organizations | Influential Organizations |
| 76369c25e4b3-58c4-441c-aff4-296c7ac9320d | Not Translated (0%) | Primary Sources of Information | Primary Sources of Information |
| 7637911b1bbe-69c9-4bbe-982b-9e0899b39d27 | Not Translated (0%) | Using a Decision Tree for Investigations | Using a Decision Tree for Investigations |
| 7638092eaf17-417f-438a-9340-464a8f3491a4 | Not Translated (0%) | Confiscation, Seizure, and Forfeiture of Assets | Confiscation, Seizure, and Forfeiture of Assets |
| 763979417db3-a688-4a20-bf9b-6f50afda5494 | Not Translated (0%) | Stripping | Stripping |
| 76400fe0524e-49d2-462f-b8cc-9294f929df1e | Not Translated (0%) | Additional Monitoring and Controls | Additional Monitoring and Controls |
| 764178db91e2-0b4f-43bd-abd7-be4738456812 | Not Translated (0%) | Disclosure to Target Party | Disclosure to Target Party |
| 7642686dffc6-3048-4cd2-805e-08015b937148 | Not Translated (0%) | Regulatory Expectations | Regulatory Expectations |
| 76435935fd6c-fde1-4b08-a094-b99d4d5f2cd0 | Not Translated (0%) | SWIFT Messages | SWIFT Messages |
| 76448401e3dc-3f54-4a4e-af37-b9a7f00d2887 | Not Translated (0%) | Sanctions Types | Sanctions Types |
| 7645c9400107-06b8-4be7-9d05-84b12d128171 | Not Translated (0%) | Management Information Systems and Reports | Management Information Systems and Reports |
| 7646427a822a-6c09-4034-a173-1ac7f5d73296 | Not Translated (0%) | Purpose of Sanctions | Purpose of Sanctions |
| 76478fff273f-e3f8-4e79-8146-b20c0f4d16c6 | Not Translated (0%) | Module Review: | Module Review: |
| 76488fff273f-e3f8-4e79-8146-b20c0f4d16c6 | Not Translated (0%) | Sanctions Evasion Techniques | Sanctions Evasion Techniques |
| 7649e0f5386d-4041-494b-9163-6ba7eeed8dd4 | Not Translated (0%) | Who Is Subject to Sanctions? | Who Is Subject to Sanctions? |
| 765015bb7bd4-0634-4056-9fa4-120ed78e5644 | Not Translated (0%) | Managing Frozen Assets | Managing Frozen Assets |
| 765127a72afd-d17a-4820-bb57-48eec5c59dc4 | Not Translated (0%) | Consequences of Noncompliance | Consequences of Noncompliance |
| 7652c8156f14-5311-45ee-ba83-a9d6d640a57d | Not Translated (0%) | Key Investigation Concepts: | Key Investigation Concepts: |
| 7653c8156f14-5311-45ee-ba83-a9d6d640a57d | Not Translated (0%) | Sanctions Lists, Screening Tools, and Identifiers | Sanctions Lists, Screening Tools, and Identifiers |
| 7654737086d9-a536-4c8f-a013-e25bd4527c19 | Not Translated (0%) | Licenses | Licenses |
| 7655ae96f49a-d3ea-43da-b1ed-8eb74e37f891 | Not Translated (0%) | Secondary Sources of Information | Secondary Sources of Information |
| 7656980e228f-59a2-47af-927d-3833f0fa7739 | Not Translated (0%) | Comparing Blocking or Freezing Assets in the United Kingdom and the Netherlands | Comparing Blocking or Freezing Assets in the United Kingdom and the Netherlands |
| 76570d25d598-e67b-4680-962b-05926698c089 | Not Translated (0%) | Understanding Mapping Requirements | Understanding Mapping Requirements |
| 7658a6a0d0c5-c9e4-48a3-84bc-a29f3ac52512 | Not Translated (0%) | Dealing in Funds | Dealing in Funds |
| 765906e3e9ee-6fc5-4e6e-8e8c-eb7710ccba4f | Not Translated (0%) | Counterparty Relationships | Counterparty Relationships |
| 7660d2fa95fa-0c58-4471-9048-3fa03e1d8a69 | Not Translated (0%) | Restructuring of Ownership Interests | Restructuring of Ownership Interests |
| 7661138dae85-f019-49e3-b01d-04b897fddc33 | Not Translated (0%) | Applying the Decision Tree to Different Types of Matches | Applying the Decision Tree to Different Types of Matches |
| 7662d2b90f42-3937-428a-b3e1-4e7c306215eb | Not Translated (0%) | Transliteration | Transliteration |
| 7663b5339a6e-7432-491c-94c0-87a7b5237500 | Not Translated (0%) | Know the Customer’s Nature of Business, Products and Services, and Jurisdiction/Geography | Know the Customer’s Nature of Business, Products and Services, and Jurisdiction/Geography |
| 76641e434dbb-7f37-4454-a981-eb2dc89a1010 | Not Translated (0%) | Fine-Tuning Screening Algorithms | Fine-Tuning Screening Algorithms |
| 76651ff95cfb-a9d3-4d34-96d0-a991e13510c5 | Not Translated (0%) | Trade-Related Sanctions Lists | Trade-Related Sanctions Lists |
| 76663ca15937-7099-4ca0-a9a2-c8128438e188 | Not Translated (0%) | Trade-Related Evasion Methods | Trade-Related Evasion Methods |
| 766798fa05ab-7dc3-44eb-9e6e-4fe93bd23da0 | Not Translated (0%) | Sanctions Lists | Sanctions Lists |
| 76682e2114bc-95c8-40f2-ba86-850562931a30 | Not Translated (0%) | Analytics and Emerging Technology | Analytics and Emerging Technology |
| 7669de475d41-5401-4ee5-9731-3fe81718f6ce | Not Translated (0%) | Regulator Expectations | Regulator Expectations |
| 76700cba927f-c7d2-4be2-97ce-bf48a6c4cfd0 | Not Translated (0%) | SPECIALIST TEAMS | SPECIALIST TEAMS |
| 7671b14a7cbc-63c1-4099-b444-745369111549 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7672b14a7cbc-63c1-4099-b444-745369111549 | Not Translated (0%) | STANDARD CHARTERED BANK, 2019 | STANDARD CHARTERED BANK, 2019 |
| 7673631cc90d-ca8c-418c-8c10-75750821f76a | Not Translated (0%) | In Search of a Clean Business Record | In Search of a Clean Business Record |
| 76740ea2ceca-30ff-4f2d-bdc5-4edbf4456577 | Not Translated (0%) | MANAGING ALERTS | MANAGING ALERTS |
| 76750ead0724-5487-4055-99d7-881429c52cf6 | Not Translated (0%) | COMMERCIAL AND INVESTMENT BANKING | COMMERCIAL AND INVESTMENT BANKING |
| 7676d7cb0375-656e-486e-8243-13fc2a23795a | Not Translated (0%) | Targeted Sanctions (Smart Sanctions) | Targeted Sanctions (Smart Sanctions) |
| 7677ae0b8a54-07b1-4544-a0ce-73628bb666c6 | Not Translated (0%) | KEY SANCTIONS LISTS | KEY SANCTIONS LISTS |
| 767886aad24a-2f84-40b1-9069-189a4b39b6e5 | Not Translated (0%) | Documenting/Reporting Beneficial Ownership Information | Documenting/Reporting Beneficial Ownership Information |
| 767922d7160c-5398-4a23-ac36-d5571655774f | Not Translated (0%) | Residual Risk | Residual Risk |
| 76806031318f-ac5b-4726-b566-4e10dab0f82c | Not Translated (0%) | MANDATORY LISTS | MANDATORY LISTS |
| 7681decd52b1-590e-4e4a-bbc0-21fafd29d791 | Not Translated (0%) | Affecting Behavioral Change | Affecting Behavioral Change |
| 768203ef7df6-e3a8-4eb3-b939-a4a6fd5ca047 | Not Translated (0%) | TOLL GATES | TOLL GATES |
| 768309115775-7acf-46ca-a441-eeefcc1105c8 | Not Translated (0%) | CONCEALMENT | CONCEALMENT |
| 7684a5fe43ed-21fb-4a8b-ab84-05d417c511b5 | Not Translated (0%) | Sectoral Sanctions | Sectoral Sanctions |
| 76857686c3de-b742-46e4-95fc-20fed4a42345 | Not Translated (0%) | TRAINING TOPICS | TRAINING TOPICS |
| 768661e7cbf6-9894-48a2-9cce-836092e04657 | Not Translated (0%) | Real Estate | Real Estate |
| 768745135c9f-3c6a-4a3a-81fb-373eaf78449b | Not Translated (0%) | FRANCE | FRANCE |
| 76886924bb57-da23-4503-b91d-f47022fecb25 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 76896924bb57-da23-4503-b91d-f47022fecb25 | Not Translated (0%) | CITIGROUP, 2014 | CITIGROUP, 2014 |
| 76908d085d4b-2bc2-4556-94b5-605e4a53dc72 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 76918d085d4b-2bc2-4556-94b5-605e4a53dc72 | Not Translated (0%) | RICHEMONT NA, 2017 | RICHEMONT NA, 2017 |
| 76924414c0fd-bed1-484c-8ef3-40fe0a086ee2 | Not Translated (0%) | TRAINING METHODS | TRAINING METHODS |
| 7693a9bc2c11-ecf0-4dd4-904f-1511fd5e039b | Not Translated (0%) | Terrorism-Related Sanctions | Terrorism-Related Sanctions |
| 76949622e14d-a127-4f46-8856-fd52528a5db8 | Not Translated (0%) | NEW ZEALAND | NEW ZEALAND |
| 769524b05521-e0f0-4135-889e-466e7cdfce64 | Not Translated (0%) | FINANCIAL ACTION TASK FORCE | FINANCIAL ACTION TASK FORCE |
| 7696a8796058-9fb5-463c-a5cf-21defd50418e | Not Translated (0%) | Customer Questionnaire | Customer Questionnaire |
| 7697d003af6f-db9c-4cde-8ffd-cfeb3c79c8f9 | Not Translated (0%) | NATURE OF BUSINESS AND PRODUCTS AND SERVICES | NATURE OF BUSINESS AND PRODUCTS AND SERVICES |
| 7698677e7cf2-bc5a-4b56-b497-c861cce3fec2 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7699677e7cf2-bc5a-4b56-b497-c861cce3fec2 | Not Translated (0%) | U.S. BANCORP, 2018 | U.S. BANCORP, 2018 |
| 7700b30bacfb-1b70-4c05-a1df-9d8b80e53288 | Not Translated (0%) | SCREENING PARAMETERS | SCREENING PARAMETERS |
| 770188fa8cfd-f0fa-4d7c-82cb-6d28ab2b9b23 | Not Translated (0%) | STEP 2: | STEP 2: |
| 770288fa8cfd-f0fa-4d7c-82cb-6d28ab2b9b23 | Not Translated (0%) | ASK, “WHAT IS THIS SANCTIONS RESTRICTION ABOUT?” | ASK, “WHAT IS THIS SANCTIONS RESTRICTION ABOUT?” |
| 770331717d22-d264-42f1-9384-5baac473b7ef | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 770431717d22-d264-42f1-9384-5baac473b7ef | Not Translated (0%) | EMENIKE NWANKWOALA, 2011 | EMENIKE NWANKWOALA, 2011 |
| 7705e5682d38-8837-4538-b49c-401cc9b78ceb | Not Translated (0%) | BANKS FINED FOR STRIPPING | BANKS FINED FOR STRIPPING |
| 770674621f8e-9a36-44a3-b045-223fab6412db | Not Translated (0%) | WHAT IS THE MOTIVATION BEHIND STRIPPING? | WHAT IS THE MOTIVATION BEHIND STRIPPING? |
| 770766dc2d81-5a4e-4f64-b23a-7e4179289d3a | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 770866dc2d81-5a4e-4f64-b23a-7e4179289d3a | Not Translated (0%) | OLEG DERIPASKA, 2019 | OLEG DERIPASKA, 2019 |
| 7709b6532e6f-b209-4c42-9a5f-e1aaca77da71 | Not Translated (0%) | WEALTH MANAGEMENT AND PRIVATE BANKING | WEALTH MANAGEMENT AND PRIVATE BANKING |
| 77108bc85908-202c-455f-a69b-d88287671f24 | Not Translated (0%) | SOUTH KOREA | SOUTH KOREA |
| 7711ae533ae8-fcb6-4776-b1fa-a552d8f8da3b | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7712ae533ae8-fcb6-4776-b1fa-a552d8f8da3b | Not Translated (0%) | UNICREDIT BANK AG, 2019 | UNICREDIT BANK AG, 2019 |
| 771336ac1d5e-f057-4722-93cf-516930f16b74 | Not Translated (0%) | Testing and Auditing | Testing and Auditing |
| 7714d1ddf509-1563-4170-998f-2b91203fd6b0 | Not Translated (0%) | Consequences to the Individual | Consequences to the Individual |
| 7715874379c7-970b-4303-b6d5-ced8a558506b | Not Translated (0%) | DIVESTMENT OF OWNERSHIP INTERESTS | DIVESTMENT OF OWNERSHIP INTERESTS |
| 7716347fc933-ac70-4f68-b035-0913acd5f841 | Not Translated (0%) | CASE EXAMPLE (HYPOTHETICAL): | CASE EXAMPLE (HYPOTHETICAL): |
| 7717347fc933-ac70-4f68-b035-0913acd5f841 | Not Translated (0%) | SYRIA PROPERTY LTD. | SYRIA PROPERTY LTD. |
| 7718fea0c438-ee02-48a7-9449-8697a605b795 | Not Translated (0%) | MATCHES TO JURISDICTION AND NATURE OF BUSINESS | MATCHES TO JURISDICTION AND NATURE OF BUSINESS |
| 7719872db145-891a-4eb8-88dc-3c95d669a453 | Not Translated (0%) | JURISDICTION/GEOGRAPHY | JURISDICTION/GEOGRAPHY |
| 7720f7084af5-2196-4196-997d-c177746f5993 | Not Translated (0%) | METHODS AND TOOLS | METHODS AND TOOLS |
| 7721b94ebcc9-c015-49c2-824f-3a39875f6dc9 | Not Translated (0%) | United States | United States |
| 77221860bbfc-3321-4fd9-8383-3deecd35b815 | Not Translated (0%) | SCOPE OF LICENSING | SCOPE OF LICENSING |
| 7723dd9e8bd7-6346-4426-9807-a6b62734fbf6 | Not Translated (0%) | WHICH SANCTIONS ARE MOST OFTEN ASSOCIATED WITH U-TURN PAYMENTS? | WHICH SANCTIONS ARE MOST OFTEN ASSOCIATED WITH U-TURN PAYMENTS? |
| 7724033c8ffb-b6ae-4625-84b6-9e1ea418113a | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7725033c8ffb-b6ae-4625-84b6-9e1ea418113a | Not Translated (0%) | RIGGS BANK, 2004 | RIGGS BANK, 2004 |
| 77269f0a3850-09e3-4aa3-9232-a75177eaa3cb | Not Translated (0%) | BLOCKING STATUTES | BLOCKING STATUTES |
| 7727f8484bb9-e3e5-4975-aa21-282d91335124 | Not Translated (0%) | UNITED STATES | UNITED STATES |
| 77286f8441ac-9502-4e8e-9182-caba3ff76131 | Not Translated (0%) | EMERGING THREATS | EMERGING THREATS |
| 772962b81e67-d237-4ffa-80e1-845c3e923e9b | Not Translated (0%) | FUZZY LOGIC AND PARTIAL MATCHING | FUZZY LOGIC AND PARTIAL MATCHING |
| 773044fbc67b-89a8-4c2d-a977-162307658c6f | Not Translated (0%) | ESCALATING A NAME-MATCH CASE FOR FURTHER REVIEW | ESCALATING A NAME-MATCH CASE FOR FURTHER REVIEW |
| 77310596d9b0-1cc9-43a4-ac52-0a0c1e98cd45 | Not Translated (0%) | Free Trade Zones/Special Economic Zones | Free Trade Zones/Special Economic Zones |
| 77322a0246b6-2466-421d-accc-1a9d193d4419 | Not Translated (0%) | OTHER INDUSTRIES | OTHER INDUSTRIES |
| 7733ac5ee3de-7504-440b-999e-6fefe681aed3 | Not Translated (0%) | Protecting the Financial System from International Criminals | Protecting the Financial System from International Criminals |
| 7734346a395b-7ab7-4d78-a50b-525f3e0b203e | Not Translated (0%) | Extraterritoriality of Sanctions Program | Extraterritoriality of Sanctions Program |
| 7735705ff4dc-f6fe-45b7-ba0d-2fab7c95c05e | Not Translated (0%) | Cyber-Related Sanctions | Cyber-Related Sanctions |
| 77360e9171df-a57f-4393-b4cf-1cf9c4f5966f | Not Translated (0%) | SCREENING TOOLS | SCREENING TOOLS |
| 773708db605a-e571-4e25-a9cd-597a84cd5445 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 773808db605a-e571-4e25-a9cd-597a84cd5445 | Not Translated (0%) | SCHLUMBERGER OILFIELD | SCHLUMBERGER OILFIELD |
| 77391852948f-fb80-464b-bf62-e66f80d19de6 | Not Translated (0%) | Concealing an End User’s Identity | Concealing an End User’s Identity |
| 77402e3e8227-7110-4fa4-990d-34b91dad1610 | Not Translated (0%) | MAINTAINING UP-TO-DATE INFORMATION | MAINTAINING UP-TO-DATE INFORMATION |
| 774129f26854-788b-4c4f-8d91-7a01d60b8363 | Not Translated (0%) | Customers | Customers |
| 77428e939078-38d9-4aa9-a3c5-e89c24fc1f30 | Not Translated (0%) | How Sanctions Regimes are Determined | How Sanctions Regimes are Determined |
| 77433e8819e0-44db-4459-b632-a8d1e51550fc | Not Translated (0%) | EU SANCTIONS | EU SANCTIONS |
| 7744d3c501df-9e15-48c5-a263-65673d785b49 | Not Translated (0%) | Globalization | Globalization |
| 7745d9fbe819-b18c-4a34-b808-ec786e12c761 | Not Translated (0%) | THIRD-PARTY DATABASES | THIRD-PARTY DATABASES |
| 774637959457-5f1f-4df0-bf5a-1cc8834c0dc3 | Not Translated (0%) | STEP 4: | STEP 4: |
| 774737959457-5f1f-4df0-bf5a-1cc8834c0dc3 | Not Translated (0%) | ASK, “HOW HAS THE SANCTIONS VIOLATION OCCURRED?” | ASK, “HOW HAS THE SANCTIONS VIOLATION OCCURRED?” |
| 77489563513d-cb14-4ddc-9135-e5422fcab6ff | Not Translated (0%) | IDENTIFIERS | IDENTIFIERS |
| 77495453ec18-45f9-479d-bb0e-7732d23f3d1a | Not Translated (0%) | OTHER COUNTRIES: | OTHER COUNTRIES: |
| 77505453ec18-45f9-479d-bb0e-7732d23f3d1a | Not Translated (0%) | “CONSOLIDATED LIST” | “CONSOLIDATED LIST” |
| 77514fae9f9f-077d-4815-93fe-514ed09a934f | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 77524fae9f9f-077d-4815-93fe-514ed09a934f | Not Translated (0%) | DEUTSCHE BANK “MIRROR TRADES,” 2017 | DEUTSCHE BANK “MIRROR TRADES,” 2017 |
| 77530c856120-4c2a-4cb9-9d98-06d77a68c04f | Not Translated (0%) | Common Words | Common Words |
| 77545085215f-714f-4fa3-ba74-f2ef84b8a4b1 | Not Translated (0%) | MEDIA PUBLICATIONS | MEDIA PUBLICATIONS |
| 775541dc4685-6c39-4050-ac99-6d229ea496ee | Not Translated (0%) | GERMANY | GERMANY |
| 7756b7b01dc9-e47e-4a77-a734-278f151acee3 | Not Translated (0%) | INTERNAL CUSTOMER RECORDS AND TRANSACTION ACTIVITY | INTERNAL CUSTOMER RECORDS AND TRANSACTION ACTIVITY |
| 7757aca97612-5d67-4f5e-a53b-ed6c40d54ee2 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7758aca97612-5d67-4f5e-a53b-ed6c40d54ee2 | Not Translated (0%) | BOBBY FISCHER, 1992 | BOBBY FISCHER, 1992 |
| 7759eea41b8e-a441-4c7d-aacb-7a990c16cbb4 | Not Translated (0%) | TRADE-RELATED ACTIVITY | TRADE-RELATED ACTIVITY |
| 776061ce90bc-037d-4ba2-bb17-2afc97a38c8d | Not Translated (0%) | LICENSING AUTHORITIES | LICENSING AUTHORITIES |
| 77611696ac96-e818-42b3-848b-00fd6edc99b0 | Not Translated (0%) | UPDATING SANCTIONS LISTS | UPDATING SANCTIONS LISTS |
| 7762cd5dfc6d-da36-439a-b456-0d70b1542488 | Not Translated (0%) | Precious Metals and Mining | Precious Metals and Mining |
| 7763104d7135-a85f-405e-9355-dd63d7e51109 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7764104d7135-a85f-405e-9355-dd63d7e51109 | Not Translated (0%) | HONDA FINANCE, 2017 | HONDA FINANCE, 2017 |
| 7765e33ba53e-29c2-4bce-a475-c05343eb33ed | Not Translated (0%) | Technology Companies | Technology Companies |
| 776672615a7d-993f-4576-ac6e-b1df80b65156 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 776772615a7d-993f-4576-ac6e-b1df80b65156 | Not Translated (0%) | TRANS MERITS CO., 2014 | TRANS MERITS CO., 2014 |
| 77680a78f6a3-e0fa-4011-88e8-06e543c4c603 | Not Translated (0%) | Management Commitment | Management Commitment |
| 7769e7b10c0f-903b-4f02-92d3-e660930960de | Not Translated (0%) | Managing Operational Challenges | Managing Operational Challenges |
| 77700cc3766b-d983-42b8-81c7-99429cb7842f | Not Translated (0%) | CUSTOMER OUTREACH | CUSTOMER OUTREACH |
| 777189bbd010-0d33-4c5d-b9e9-c5a18c31f94a | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 777289bbd010-0d33-4c5d-b9e9-c5a18c31f94a | Not Translated (0%) | ACCESS USA SHIPPING LLC, 2017 | ACCESS USA SHIPPING LLC, 2017 |
| 7773801c90f7-50c7-4b16-950e-26912047c215 | Not Translated (0%) | EUROPEAN UNION | EUROPEAN UNION |
| 777479f43084-5d15-48e1-9d67-13863b5566d3 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 777579f43084-5d15-48e1-9d67-13863b5566d3 | Not Translated (0%) | MR. | MR. |
| 777679f43084-5d15-48e1-9d67-13863b5566d3 | Not Translated (0%) | EZZ, 2011 | EZZ, 2011 |
| 777775c4ce3b-72ca-465e-8cbb-03140c9df843 | Not Translated (0%) | Sanctions Regimes | Sanctions Regimes |
| 7778546389db-32db-4196-8c0c-e116a70eba0d | Not Translated (0%) | SWIFT MESSAGES FOR INTERNATIONAL PAYMENTS | SWIFT MESSAGES FOR INTERNATIONAL PAYMENTS |
| 7779993ba243-9147-43ce-94a5-8a6c8a2d47dd | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7780993ba243-9147-43ce-94a5-8a6c8a2d47dd | Not Translated (0%) | DANSKE BANK, 2018 | DANSKE BANK, 2018 |
| 7781fcbce76f-4a10-488b-a026-dddfcea3bcab | Not Translated (0%) | HOW DELISTING IMPACTS YOUR KYC AND ONGOING MONITORING | HOW DELISTING IMPACTS YOUR KYC AND ONGOING MONITORING |
| 77826407d975-4639-41b8-a921-40b15f5e0d4f | Not Translated (0%) | SINGAPORE | SINGAPORE |
| 7783ac6465be-ec2e-4fed-9172-9adc59cfaa13 | Not Translated (0%) | REVIEW OF TRANSACTION ACTIVITY | REVIEW OF TRANSACTION ACTIVITY |
| 778425dcb185-19af-46e8-9ed1-3db55d850568 | Not Translated (0%) | KEY INFORMATION TO COLLECT | KEY INFORMATION TO COLLECT |
| 7785b578d360-50cd-4d96-8245-944bd6a444d3 | Not Translated (0%) | CASE EXAMPLE (HYPOTHETICAL): | CASE EXAMPLE (HYPOTHETICAL): |
| 7786b578d360-50cd-4d96-8245-944bd6a444d3 | Not Translated (0%) | MR. | MR. |
| 7787b578d360-50cd-4d96-8245-944bd6a444d3 | Not Translated (0%) | TIMTCHENKO | TIMTCHENKO |
| 778843763983-5f1e-40ca-aba9-4e4b892aedfb | Not Translated (0%) | MATCHES TO AN ENTITY’S NAME | MATCHES TO AN ENTITY’S NAME |
| 778973172ec5-8ec5-4f67-8985-319722c99b7c | Not Translated (0%) | Comprehensive Sanctions | Comprehensive Sanctions |
| 7790f23ee41d-fdce-4cd2-a4ef-5a10f82e9666 | Not Translated (0%) | STEP 5: | STEP 5: |
| 7791f23ee41d-fdce-4cd2-a4ef-5a10f82e9666 | Not Translated (0%) | RECORD AND DOCUMENT | RECORD AND DOCUMENT |
| 77924c52a2d3-28b6-4c5d-9008-1640cef86bc6 | Not Translated (0%) | Trade Networks | Trade Networks |
| 7793e8ca8be3-81c5-4b09-b2f3-658544c9c179 | Not Translated (0%) | THE UNITED KINGDOM (UK) | THE UNITED KINGDOM (UK) |
| 7794b593f5c6-8958-4ab2-b4de-cbabcc73626c | Not Translated (0%) | UN SANCTIONS | UN SANCTIONS |
| 7795fc587947-55d7-4c4a-a783-e590df0142f1 | Not Translated (0%) | Vendor Screening | Vendor Screening |
| 77969fd3783d-0db6-48d1-bf9a-1b76d0fa18cf | Not Translated (0%) | CASE EXAMPLE: e.l.f. | CASE EXAMPLE: e.l.f. |
| 77979fd3783d-0db6-48d1-bf9a-1b76d0fa18cf | Not Translated (0%) | BEAUTY, 2019 | BEAUTY, 2019 |
| 779805e2a380-2350-409d-9d68-36e40b96404c | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 779905e2a380-2350-409d-9d68-36e40b96404c | Not Translated (0%) | NORTH KOREA FRONT COMPANIES, 2016 | NORTH KOREA FRONT COMPANIES, 2016 |
| 7800ce574ac3-31b4-4c5e-99d0-23a7b054cbc6 | Not Translated (0%) | Policies, Procedures, and Internal Controls | Policies, Procedures, and Internal Controls |
| 7801def3eb52-1894-47ca-aecd-006163415942 | Not Translated (0%) | JAPAN | JAPAN |
| 7802edc764f2-f788-4bcc-a4fe-f014a8ba8a6a | Not Translated (0%) | HONG KONG (China) | HONG KONG (China) |
| 7803272fbf70-fef0-48ec-9199-4db97d747341 | Not Translated (0%) | Noisy or Neutral Words | Noisy or Neutral Words |
| 7804c75903ad-9817-4da0-a71f-3c7d9dfc1fba | Not Translated (0%) | REPUTATIONAL DAMAGE | REPUTATIONAL DAMAGE |
| 78058cbe6bde-6c69-4aa8-a8d9-db8166738090 | Not Translated (0%) | KEY TRADE ACTIVITY LISTS | KEY TRADE ACTIVITY LISTS |
| 78067c829cb5-6349-4316-9717-b66461adbb53 | Not Translated (0%) | REPORTING IN THE UNITED STATES | REPORTING IN THE UNITED STATES |
| 78079a0a7c8e-8f13-4f28-8aa1-98591ef5ffb1 | Not Translated (0%) | IMPRISONMENT | IMPRISONMENT |
| 7808aeb7d08c-09b6-4914-93b1-0be9029ddaea | Not Translated (0%) | REORGANIZATION OF OWNERSHIP INTERESTS | REORGANIZATION OF OWNERSHIP INTERESTS |
| 7809382b0060-b078-483c-9b3b-8964dfa2ca75 | Not Translated (0%) | USE OF FRONT AND SHELL COMPANIES | USE OF FRONT AND SHELL COMPANIES |
| 781034aaf0b4-046b-4e82-b4e3-3c0b10257602 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 781134aaf0b4-046b-4e82-b4e3-3c0b10257602 | Not Translated (0%) | BNP PARIBAS, 2015 | BNP PARIBAS, 2015 |
| 7812d41bab3c-4531-4594-b6a7-764c6e6f5181 | Not Translated (0%) | Other Jurisdictions | Other Jurisdictions |
| 7813924a6441-a33b-45d6-af4d-2af2b304d58a | Not Translated (0%) | LICENSING TYPES | LICENSING TYPES |
| 781452b355b9-6a9c-48da-9622-90378df662c2 | Not Translated (0%) | IDENTIFIERS – INDIVIDUALS | IDENTIFIERS – INDIVIDUALS |
| 781551e26852-34c4-4ab2-aa00-45cd8cbc7e2f | Not Translated (0%) | Switching Cargo on the Open Sea | Switching Cargo on the Open Sea |
| 781678dde65e-04b9-421c-b190-ff25e9ef1215 | Not Translated (0%) | Performing Beneficial Ownership Due Diligence | Performing Beneficial Ownership Due Diligence |
| 78179e5fe2ae-c334-4526-a17a-69598ee42409 | Not Translated (0%) | Exemptions & Exceptions (Licenses) | Exemptions & Exceptions (Licenses) |
| 7818880700a6-7513-4e3b-b450-6b76a0b9b6b5 | Not Translated (0%) | TRANSSHIPMENT | TRANSSHIPMENT |
| 7819c8d99d65-9f52-4367-bc94-7ce76049e443 | Not Translated (0%) | United Nations | United Nations |
| 78201e1c4b04-5d91-4fdb-86c8-cc1ebcfdc2f5 | Not Translated (0%) | Delivery Channels | Delivery Channels |
| 78214fd577c3-20ec-4ae9-bdb5-09392ef45c3e | Not Translated (0%) | UPDATING ALGORITHMS AND CALIBRATING THRESHOLDS | UPDATING ALGORITHMS AND CALIBRATING THRESHOLDS |
| 782212a7c86f-27d2-4ec5-9298-bea5e43c26da | Not Translated (0%) | US SANCTIONS | US SANCTIONS |
| 7823a58e5323-4e65-4937-8710-a4b149635f40 | Not Translated (0%) | MANAGING FROZEN ASSETS: | MANAGING FROZEN ASSETS: |
| 7824a58e5323-4e65-4937-8710-a4b149635f40 | Not Translated (0%) | ERRORS, ERRONEOUS ASSUMPTIONS, AND CHALLENGES | ERRORS, ERRONEOUS ASSUMPTIONS, AND CHALLENGES |
| 78253ad16f2e-2856-4796-8bb2-abf5442a568d | Not Translated (0%) | LICENSES: | LICENSES: |
| 78263ad16f2e-2856-4796-8bb2-abf5442a568d | Not Translated (0%) | ERRORS, ERRONEOUS ASSUMPTIONS, AND CHALLENGES | ERRORS, ERRONEOUS ASSUMPTIONS, AND CHALLENGES |
| 7827c33e3dc8-b251-4be3-a368-c008ea55ccd2 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7828c33e3dc8-b251-4be3-a368-c008ea55ccd2 | Not Translated (0%) | ILLINOIS TOOL WORKS, INC., 2019 | ILLINOIS TOOL WORKS, INC., 2019 |
| 7829380ec703-d372-4576-b134-3bcf5d87e758 | Not Translated (0%) | Relationship Managers and Frontline Staff | Relationship Managers and Frontline Staff |
| 78301024f5d5-6f68-4631-bf20-9b2dc882ca24 | Not Translated (0%) | Databases and Other Information Sources | Databases and Other Information Sources |
| 7831dbff4de5-5d48-4e58-8090-fb5513087f17 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7832dbff4de5-5d48-4e58-8090-fb5513087f17 | Not Translated (0%) | STATE STREET BANK AND TRUST, 2015 | STATE STREET BANK AND TRUST, 2015 |
| 783358fb94ad-b035-4ee0-822a-11c3c45aad1d | Not Translated (0%) | SUPPLEMENTARY LISTS | SUPPLEMENTARY LISTS |
| 7834cded3f95-26e9-452e-b83e-aa252ae4f6af | Not Translated (0%) | International Efforts to Detect Loitering | International Efforts to Detect Loitering |
| 7835e0d0191e-1641-49f8-927f-63adfe44cbc1 | Not Translated (0%) | SANCTIONS LISTS | SANCTIONS LISTS |
| 78363ab73807-f950-41e2-a992-9c20141109ee | Not Translated (0%) | Back-to-Back Letters of Credit | Back-to-Back Letters of Credit |
| 7837a1087b0d-33f9-4908-b512-6a9517be34e8 | Not Translated (0%) | MATCHES IN TRANSACTIONS (NAME OR NATURE OF ACTIVITY) | MATCHES IN TRANSACTIONS (NAME OR NATURE OF ACTIVITY) |
| 7838af6bee51-63eb-41c8-adc5-871d535b0d2e | Not Translated (0%) | OFAC AND THE 50 PERCENT RULE | OFAC AND THE 50 PERCENT RULE |
| 7839d71a5935-58aa-479d-979f-d1206a183c87 | Not Translated (0%) | OFFERING DOWNSTREAM SERVICES | OFFERING DOWNSTREAM SERVICES |
| 7840698f2493-53c7-462f-a91a-4f5e903a67d9 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7841698f2493-53c7-462f-a91a-4f5e903a67d9 | Not Translated (0%) | BNP PARIBAS AND SUDANESE CUSTOMERS, 2015 | BNP PARIBAS AND SUDANESE CUSTOMERS, 2015 |
| 784273760da1-3df2-4d88-b51e-3d2d7904b777 | Not Translated (0%) | Facilitation | Facilitation |
| 78435f3e6d14-60c0-44a7-84dc-bf7cdbbeac74 | Not Translated (0%) | Staying Current on Sanctions | Staying Current on Sanctions |
| 78446c8c7521-ebbe-41d7-ae5f-5b6b18471d3d | Not Translated (0%) | COMPONENTS OF AN EFFECTIVE TRAINING PROGRAM | COMPONENTS OF AN EFFECTIVE TRAINING PROGRAM |
| 78457eafbaa3-22bc-469a-9214-06767200d3eb | Not Translated (0%) | Other Considerations for Determining the Scope of Transactional Review | Other Considerations for Determining the Scope of Transactional Review |
| 7846d7ef70f6-0233-419d-8f5b-e71fbe008c7f | Not Translated (0%) | Inherent Risks | Inherent Risks |
| 784749adb8ed-31db-4133-b2c0-bdecd1c1c278 | Not Translated (0%) | EU More than 50 Percent Rule | EU More than 50 Percent Rule |
| 78483aa803b9-8947-40da-b136-4d0b92c2fced | Not Translated (0%) | CORRESPONDENT BANKING | CORRESPONDENT BANKING |
| 7849dd9070b6-41e9-4bbd-a7b4-03ae012c2787 | Not Translated (0%) | INDIA | INDIA |
| 78503d2143cf-c5ef-4673-8ee2-b1e6543818ea | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 78513d2143cf-c5ef-4673-8ee2-b1e6543818ea | Not Translated (0%) | LIBYA | LIBYA |
| 78529cc7dd3e-5e1f-4b89-a662-7662e83ee886 | Not Translated (0%) | Using a Neutral Jurisdiction or Country | Using a Neutral Jurisdiction or Country |
| 78532ab48272-fcf6-4b6b-b378-314cbe56677b | Not Translated (0%) | Consequences to the Organization | Consequences to the Organization |
| 7854172c9fdf-f458-4853-bce2-2cf45654ff09 | Not Translated (0%) | OFAC 50 Percent Rule | OFAC 50 Percent Rule |
| 785590097696-9c50-4056-b002-d5993939d21e | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 785690097696-9c50-4056-b002-d5993939d21e | Not Translated (0%) | BLUE SKY BLUE SEA, 2017 | BLUE SKY BLUE SEA, 2017 |
| 7857821bcb5b-bef5-4608-a525-915b7ae70a3d | Not Translated (0%) | Final Note | Final Note |
| 785827d17bad-917a-49ef-9c17-f11455c5065d | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 785927d17bad-917a-49ef-9c17-f11455c5065d | Not Translated (0%) | COMMERZBANK, 2015 | COMMERZBANK, 2015 |
| 7860848dab48-ed8a-4580-a6f4-438e4b2051b4 | Not Translated (0%) | RED FLAGS | RED FLAGS |
| 7861ce1a917f-3097-4942-a4a9-a85852856926 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7862ce1a917f-3097-4942-a4a9-a85852856926 | Not Translated (0%) | QUEENSLAND MINES | QUEENSLAND MINES |
| 786309f27380-1e21-4e64-afe3-3ffaa5d4de04 | Not Translated (0%) | DETERMINE BENEFICIAL OWNERSHIP | DETERMINE BENEFICIAL OWNERSHIP |
| 7864b0baf82c-3cdf-4a5e-913c-7d39a13cd706 | Not Translated (0%) | A FINAL NOTE ABOUT REPORTING | A FINAL NOTE ABOUT REPORTING |
| 7865689363bf-a1e4-4df0-9798-08c718dfa698 | Not Translated (0%) | FINANCIAL SANCTIONS | FINANCIAL SANCTIONS |
| 78665dab93aa-2678-40ea-be54-4a0036937da8 | Not Translated (0%) | FINES | FINES |
| 78670f0ea49a-20bb-425d-bbd6-355d935da71c | Not Translated (0%) | Employee Training | Employee Training |
| 78686afc1772-4ce9-4f9e-8e5a-3b19bac773c4 | Not Translated (0%) | CHANGING RISKS OF INTERNAL AND EXTERNAL STRIPPING | CHANGING RISKS OF INTERNAL AND EXTERNAL STRIPPING |
| 78690be37e0b-fd36-49a1-a5e6-de743be5ed96 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 78700be37e0b-fd36-49a1-a5e6-de743be5ed96 | Not Translated (0%) | SWITZERLAND’S BSI BANK, 2016 | SWITZERLAND’S BSI BANK, 2016 |
| 7871e87b47d9-3b7b-4834-9381-a4f25418f59f | Not Translated (0%) | IDENTIFIERS – LEGAL ENTITIES | IDENTIFIERS – LEGAL ENTITIES |
| 7872ce35b11e-60eb-4a8b-86c3-f054a906a7de | Not Translated (0%) | WHAT IS A U-TURN PAYMENT? | WHAT IS A U-TURN PAYMENT? |
| 7873aa06a640-ae22-48ad-b174-8c29c39a8860 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7874aa06a640-ae22-48ad-b174-8c29c39a8860 | Not Translated (0%) | DUTCH SHIPPING COMPANY, 2016 | DUTCH SHIPPING COMPANY, 2016 |
| 787519dc70ae-308d-4931-9bb3-90ac486cfa6b | Not Translated (0%) | Transshipment | Transshipment |
| 787646eb34d4-d07c-4449-94e7-1f0a8c065f74 | Not Translated (0%) | Countries | Countries |
| 78775edb2104-cbd1-4348-8e4a-c34ba2386ec5 | Not Translated (0%) | IDENTIFYING THE TARGET AUDIENCE | IDENTIFYING THE TARGET AUDIENCE |
| 787899aee8ec-f3f2-4200-af86-e6ca26046419 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 787999aee8ec-f3f2-4200-af86-e6ca26046419 | Not Translated (0%) | BENEFICIAL OWNERSHIP AND RISK APPETITE | BENEFICIAL OWNERSHIP AND RISK APPETITE |
| 78805140ba13-cf51-4ce9-b0a9-d822fff500fd | Not Translated (0%) | AUSTRALIA | AUSTRALIA |
| 7881896310f7-ec5a-41c2-9634-d1b4796cc562 | Not Translated (0%) | Exporting without a License | Exporting without a License |
| 78821ec18420-df30-4f37-a118-653694a91c0c | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 78831ec18420-df30-4f37-a118-653694a91c0c | Not Translated (0%) | ZTE CORPORATION, 2018 | ZTE CORPORATION, 2018 |
| 7884a67b2e64-477b-4ebc-bb93-6c8e634b1bfb | Not Translated (0%) | FALSIFICATION OF DOCUMENTS | FALSIFICATION OF DOCUMENTS |
| 788520b36587-fa73-4eb3-8b10-abc4f84dbe0d | Not Translated (0%) | DATA TRANSFER | DATA TRANSFER |
| 788684feb0de-ab6b-47bc-91e5-2c0f97e301b0 | Not Translated (0%) | Other Algorithms | Other Algorithms |
| 78870bb27ad2-dfbf-4fbe-9a2a-918fafe96e25 | Not Translated (0%) | TRADE SANCTIONS | TRADE SANCTIONS |
| 78885459d053-2321-415e-9de5-a108812dca52 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 78895459d053-2321-415e-9de5-a108812dca52 | Not Translated (0%) | LIBYA AND THE NPT | LIBYA AND THE NPT |
| 78901bdec5c1-68cd-40b1-9389-7fb641c73b31 | Not Translated (0%) | Diminishing the Power of Regimes to Commit Human Rights Violations | Diminishing the Power of Regimes to Commit Human Rights Violations |
| 7891b152d8c7-4113-4370-93a9-bda87e6ea59b | Not Translated (0%) | USING NESTED ACCOUNTS | USING NESTED ACCOUNTS |
| 7892634f94b1-beaa-457e-8677-dff42cf8d405 | Not Translated (0%) | UNITED NATIONS | UNITED NATIONS |
| 789335290f71-cacd-49fc-bd8b-affb451c0800 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 789435290f71-cacd-49fc-bd8b-affb451c0800 | Not Translated (0%) | U.S. BANK NATIONAL ASSOCIATION, 2018 | U.S. BANK NATIONAL ASSOCIATION, 2018 |
| 78952be71078-3ec1-4e97-af01-da8d3841a0cb | Not Translated (0%) | Travel Bans | Travel Bans |
| 7896d890c491-5311-4397-8805-e5a1f396e191 | Not Translated (0%) | Useful Documents | Useful Documents |
| 78978bcff0a4-0193-449b-8c12-3ed2d872bbc7 | Not Translated (0%) | DUAL-USE GOODS | DUAL-USE GOODS |
| 789824647ffe-f440-4de7-bea5-658cfc12aab9 | Not Translated (0%) | RISK FORMULA: | RISK FORMULA: |
| 789924647ffe-f440-4de7-bea5-658cfc12aab9 | Not Translated (0%) | INHERENT RISK, CONTROL EFFECTIVENESS, AND RESIDUAL RISK | INHERENT RISK, CONTROL EFFECTIVENESS, AND RESIDUAL RISK |
| 7900a2add92d-ecf2-4f9b-9daf-766b44861c0a | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7901a2add92d-ecf2-4f9b-9daf-766b44861c0a | Not Translated (0%) | SANCTIONS AGAINST SUDAN 1996–2001 | SANCTIONS AGAINST SUDAN 1996–2001 |
| 79026a087d0a-fc4a-4283-ab20-5cd0506ea40a | Not Translated (0%) | CANADA | CANADA |
| 790367f110f5-0591-4980-9d26-e19e241f34bb | Not Translated (0%) | GOOGLE AND OTHER SEARCH ENGINES | GOOGLE AND OTHER SEARCH ENGINES |
| 7904cb8ebcb2-9059-4469-a07d-c46c1b2bbab5 | Not Translated (0%) | CRÉDIT AGRICOLE FINED IN 2015 | CRÉDIT AGRICOLE FINED IN 2015 |
| 7905db209730-c99d-4169-85bf-9d59eddaa6f1 | Not Translated (0%) | REPORTING IN THE EUROPEAN UNION | REPORTING IN THE EUROPEAN UNION |
| 79063376bf2f-b3b6-4d58-812a-da1474597d60 | Not Translated (0%) | Misappropriation of State Resources | Misappropriation of State Resources |
| 7907f030e3b7-1400-4f33-a6a4-0341dd63a40a | Not Translated (0%) | Surnames vs. Forenames | Surnames vs. Forenames |
| 79088cd0c6d5-c5c4-4d42-849c-0473f07aa6d8 | Not Translated (0%) | REPORTING IN THE UNITED KINGDOM | REPORTING IN THE UNITED KINGDOM |
| 7909aa40c3e2-c8f6-4689-a968-53cdc716f533 | Not Translated (0%) | Economic Sanctions | Economic Sanctions |
| 7910977b170f-1815-471f-a274-7d4881ae2952 | Not Translated (0%) | Concealing the Final Destination of Goods | Concealing the Final Destination of Goods |
| 791141fe3d2b-0f3b-4a88-b89d-e1b23a229e1b | Not Translated (0%) | TECHNOLOGY VENDORS | TECHNOLOGY VENDORS |
| 79125929b02e-bfc1-4a28-b5e4-673acf768648 | Not Translated (0%) | TRAINING TIMING AND LOCATIONS | TRAINING TIMING AND LOCATIONS |
| 7913aaf9a5d3-768a-485a-81b2-0516934468d3 | Not Translated (0%) | CHINA | CHINA |
| 7914c3318d5f-4dba-43c4-8c3a-78a678f95d83 | Not Translated (0%) | Control Effectiveness | Control Effectiveness |
| 791555b8bd39-ce77-43bd-9c8b-22dcf349740f | Not Translated (0%) | WHAT IS EXTERNAL STRIPPING? | WHAT IS EXTERNAL STRIPPING? |
| 791696f213f2-6283-4654-92ab-09bde3d66529 | Not Translated (0%) | COMMON ERRORS AND ASSUMPTIONS | COMMON ERRORS AND ASSUMPTIONS |
| 7917ae941de0-dd9b-42d3-8118-730434a98f6a | Not Translated (0%) | KEY LEGAL DOCUMENTS | KEY LEGAL DOCUMENTS |
| 79180217b9f1-9271-408c-bc67-4ec62955f184 | Not Translated (0%) | Products and Services | Products and Services |
| 7919f6805cf0-c51f-4970-b83f-9623a04d7330 | Not Translated (0%) | COMMON ALGORITHMS | COMMON ALGORITHMS |
| 7920440f4a61-b07e-4412-9312-26e9d4dc08a1 | Not Translated (0%) | Evasion through Consolidation of Goods | Evasion through Consolidation of Goods |
| 792181368320-fbba-43e6-ac0b-81285555f223 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 792281368320-fbba-43e6-ac0b-81285555f223 | Not Translated (0%) | HAVERLY SYSTEMS, INC., 2019 | HAVERLY SYSTEMS, INC., 2019 |
| 7923fde373df-ff72-4297-b869-a48816129d85 | Not Translated (0%) | STEP 1: | STEP 1: |
| 7924fde373df-ff72-4297-b869-a48816129d85 | Not Translated (0%) | ASK, “IS THERE AN APPLICABLE SANCTIONS RESTRICTION?” | ASK, “IS THERE AN APPLICABLE SANCTIONS RESTRICTION?” |
| 7925d97f82d1-a687-46d8-a2ce-447a7498c449 | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7926d97f82d1-a687-46d8-a2ce-447a7498c449 | Not Translated (0%) | OCEAN MARITIME MANAGEMENT, 2014 | OCEAN MARITIME MANAGEMENT, 2014 |
| 79275c2fc271-f2e0-43b1-855b-da07c22e0316 | Not Translated (0%) | WIRE-STRIPPING | WIRE-STRIPPING |
| 7928ddaa88ff-8f84-4914-94e2-5159522c0ffc | Not Translated (0%) | SOCIAL MEDIA | SOCIAL MEDIA |
| 7929babfffab-c847-4659-a7d5-3223a0a9ef7d | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7930babfffab-c847-4659-a7d5-3223a0a9ef7d | Not Translated (0%) | EPSILON, 2014 | EPSILON, 2014 |
| 7931a26a1f85-0c02-498e-afeb-99deeb79dc4c | Not Translated (0%) | STEP 3: | STEP 3: |
| 7932a26a1f85-0c02-498e-afeb-99deeb79dc4c | Not Translated (0%) | ASK, “HAS THIS SANCTIONS RESTRICTION BEEN VIOLATED?” | ASK, “HAS THIS SANCTIONS RESTRICTION BEEN VIOLATED?” |
| 7933290ff71c-22bb-46bf-88e4-12f550897278 | Not Translated (0%) | CORPORATE REGISTERS | CORPORATE REGISTERS |
| 793452905268-1416-4ba7-9a05-8d466f7eee08 | Not Translated (0%) | HOW A SWIFT MESSAGE GETS SEPARATED | HOW A SWIFT MESSAGE GETS SEPARATED |
| 793511482d52-5118-45c6-ac79-737238efe8bc | Not Translated (0%) | SWITZERLAND | SWITZERLAND |
| 7936e5f491e7-e7f9-4beb-827b-2f6417de213d | Not Translated (0%) | Good and Poor Practices | Good and Poor Practices |
| 7937d9167b4b-f6ea-4f72-ad00-95cda3ab202d | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 7938d9167b4b-f6ea-4f72-ad00-95cda3ab202d | Not Translated (0%) | COBHAM HOLDINGS, INC., 2018 | COBHAM HOLDINGS, INC., 2018 |
| 79390ef8104e-a4de-47c3-9f00-d3ac4e469804 | Not Translated (0%) | RISK APPETITE | RISK APPETITE |
| 7940fefc4001-acaf-41b5-813a-915dffdadc10 | Not Translated (0%) | Luxury Goods | Luxury Goods |
| 794179fd3978-1404-40d7-8675-a13e168dab6a | Not Translated (0%) | THREE TYPES OF SWIFT MESSAGES | THREE TYPES OF SWIFT MESSAGES |
| 7942be995885-3a8e-4dc3-8f39-c5420fd95148 | Not Translated (0%) | MATCHES TO AN INDIVIDUAL’S NAME | MATCHES TO AN INDIVIDUAL’S NAME |
| 7943bf5a326d-9c37-4ae8-a698-d39111c29c52 | Not Translated (0%) | European Union | European Union |
| 7944176fee0c-0494-470a-a038-68c20766cce1 | Not Translated (0%) | Risk Assessment | Risk Assessment |
| 7945b25262b7-37f3-4149-947c-157cc69d8ab9 | Not Translated (0%) | Customer Screening with Higher Thresholds (Static Data) vs. Screening of Unstructured Data | Customer Screening with Higher Thresholds (Static Data) vs. Screening of Unstructured Data |
| 7946839c67b1-128b-4e77-96d1-5c9ba00def81 | Not Translated (0%) | INSURANCE | INSURANCE |
| 7947a377698c-8401-464a-a1e1-3d74b89ff16d | Not Translated (0%) | TAIWAN | TAIWAN |
| 7948c79ea646-20bd-465d-8598-fbadffaa1bf5 | Not Translated (0%) | RETAIL BANKING | RETAIL BANKING |
| 794947aa4b37-564e-472e-bb9d-f17f6a38305a | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 795047aa4b37-564e-472e-bb9d-f17f6a38305a | Not Translated (0%) | TECHNOPROMEXPORT, 2017 | TECHNOPROMEXPORT, 2017 |
| 79514e3f043d-0d2e-4f36-9126-0938a6cf15ea | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 79524e3f043d-0d2e-4f36-9126-0938a6cf15ea | Not Translated (0%) | WALMART CANADA, 1997 | WALMART CANADA, 1997 |
| 795377dd25cc-6a9f-48bf-9e31-2ffdeb1225bd | Not Translated (0%) | CASE EXAMPLE: | CASE EXAMPLE: |
| 795477dd25cc-6a9f-48bf-9e31-2ffdeb1225bd | Not Translated (0%) | BARCLAYS BANK PLC, 2016 | BARCLAYS BANK PLC, 2016 |
| 79555ef55a89-4c70-4bf3-a3a2-50f876dbf0a0 | Not Translated (0%) | Preventing the Proliferation of Weapons of Mass Destruction | Preventing the Proliferation of Weapons of Mass Destruction |
| 79564e89a948-87e5-4362-9b4c-f67499f51182 | Not Translated (0%) | OTHER JURISDICTIONS | OTHER JURISDICTIONS |
| 7957904ac1d1-8182-4819-83a5-938ca550e84c | Not Translated (0%) | CALCULATE BENEFICIAL OWNERSHIP | CALCULATE BENEFICIAL OWNERSHIP |
| 79586774bcec-6299-439f-99ec-fb3cb8f66644 | Not Translated (0%) | 4 | 4 |
| 7959df7e0a48-0fff-45cb-9b20-af8d19bebf42 | Not Translated (0%) | 13 | 13 |
| 79600eea0d9f-41b2-4b84-a86c-faee362718c0 | Not Translated (0%) | 44 | 44 |
| 7961f2d76f33-60a0-44ae-b07a-be2e93649254 | Not Translated (0%) | 47 | 47 |
| 7962baaadfc5-fb3c-4655-b207-b346d8820bf6 | Not Translated (0%) | 32 | 32 |
| 7963642531b8-5454-4445-8b71-6b5395ab0d85 | Not Translated (0%) | 24 | 24 |
| 79641b63e6e4-7744-4552-89bc-305e60c4d4b6 | Not Translated (0%) | 11 | 11 |
| 7965ba1455ab-fbd4-4616-b80a-272616d70728 | Not Translated (0%) | 34 | 34 |
| 7966bb43c84d-c5f7-41e6-abae-865d4e738ee0 | Not Translated (0%) | 63 | 63 |
| 79679c2ad4fd-5a41-4c9d-91b7-e044877a7dee | Not Translated (0%) | 76 | 76 |
| 79683e3630e6-6261-4b61-8f38-177c534d1a89 | Not Translated (0%) | 38 | 38 |
| 796950812598-21c2-4a2e-b072-44c87d82a3c7 | Not Translated (0%) | 110 | 110 |
| 7970320c3aad-a61e-4dfc-a448-e7fa3f0f3489 | Not Translated (0%) | 7 | 7 |
| 7971528df51a-a129-4df0-89bf-9e28e9b7de5e | Not Translated (0%) | 22 | 22 |
| 7972f977864e-080e-40a8-ade5-ff1577ceb1c9 | Not Translated (0%) | 56 | 56 |
| 797302947e9e-3119-40a5-878d-a038c48bf3b2 | Not Translated (0%) | SPS–SWIFT Messages–MT103 Fields | SPS–SWIFT Messages–MT103 Fields |
| 79741e131cef-d99f-40e5-b58a-0da3c9837dba | Not Translated (0%) | 108 | 108 |
| 7975019fe4f0-31e2-4fd2-841a-1cff6e8aefa2 | Not Translated (0%) | 57 | 57 |
| 79760f830348-f077-45eb-a4a9-dade227007f3 | Not Translated (0%) | 77 | 77 |
| 7977a5fffd69-b69e-4b15-920a-97d35f7cdf32 | Not Translated (0%) | 74 | 74 |
| 797807f85555-27ce-4fa2-a7b8-b8e5a1cc4d14 | Not Translated (0%) | 103 | 103 |
| 79790aaae2bb-6cbe-4f3b-a3ce-3961a41ed0cd | Not Translated (0%) | 111 | 111 |
| 79806e03c7bc-1005-49ae-babf-fa9267298e61 | Not Translated (0%) | 9 | 9 |
| 798118c93bec-036e-4cac-9e3c-0ace132ab7d9 | Not Translated (0%) | 71 | 71 |
| 79824dda1198-fb6c-4af4-baf3-d935820d1f84 | Not Translated (0%) | 51 | 51 |
| 7983ebc5100f-ca1d-4867-b481-9e0ff8f91d88 | Not Translated (0%) | 15 | 15 |
| 7984a5c8a7d6-cc67-4e95-ade4-3f09fc972310 | Not Translated (0%) | SPS–SWIFT MT103 | SPS–SWIFT MT103 |
| 79855b43dc0f-70fe-470d-b326-03a939b0f6c4 | Not Translated (0%) | 69 | 69 |
| 79860e0b0153-a7b7-44fd-9c3b-9bf739a93191 | Not Translated (0%) | 70 | 70 |
| 7987d6308449-d625-4fa5-830c-6c9728e2fcd7 | Not Translated (0%) | 86 | 86 |
| 7988615a7609-1c13-40cb-9ef3-41aad133ad76 | Not Translated (0%) | 100 | 100 |
| 7989d16f52a8-086f-43c5-a082-21b8c2be706d | Not Translated (0%) | 107 | 107 |
| 79906100631d-6245-4d0e-a93c-2fd9bbb8f18b | Not Translated (0%) | 29 | 29 |
| 79911979da5d-c4bd-4495-8501-cfd58cbc4b11 | Not Translated (0%) | 83 | 83 |
| 79926a08289f-78bd-44cd-aa72-cd0f3aee0e34 | Not Translated (0%) | 39 | 39 |
| 7993b27bdfa3-a5f7-4828-90de-8c3f4ff0e4e6 | Not Translated (0%) | 8 | 8 |
| 7994f6cea3df-9432-43f1-8180-c0dbe9d9ed9c | Not Translated (0%) | 12 | 12 |
| 79956bb59343-5547-48ce-bcd4-6b15745000e0 | Not Translated (0%) | 6 | 6 |
| 7996e6bde68d-b5d3-4713-9237-f992e583546c | Not Translated (0%) | Sanctions Monitoring: | Sanctions Monitoring: |
| 7997e6bde68d-b5d3-4713-9237-f992e583546c | Not Translated (0%) | Benefits and Costs of Automated vs. Manual Screening | Benefits and Costs of Automated vs. Manual Screening |
| 799821f7265f-350d-4318-b127-b4985c51d098 | Not Translated (0%) | 99 | 99 |
| 7999c16253c7-4255-42d0-b55b-573f57dd590e | Not Translated (0%) | 28 | 28 |
| 80002abf0ba8-b851-4648-a091-5bd83ca2ce12 | Not Translated (0%) | 16 | 16 |
| 8001d7936415-ba92-431d-86e6-110d485f3601 | Not Translated (0%) | 109 | 109 |
| 8002ef3f532e-60ac-4d1d-ab5c-57409b1cc181 | Not Translated (0%) | 54 | 54 |
| 800310997bdb-64fe-4b77-8e18-954e633c3c81 | Not Translated (0%) | 55 | 55 |
| 800402b6b97b-9483-490b-8a56-4bdf6471f53e | Not Translated (0%) | 49 | 49 |
| 8005e8bc59e3-eb1f-4c28-94cb-cb6166b2f39f | Not Translated (0%) | 85 | 85 |
| 8006b5369843-4395-4499-b45b-2929b1978b2f | Not Translated (0%) | 72 | 72 |
| 8007b37de04b-8ba2-4950-bd5e-0dcd0106f776 | Not Translated (0%) | 1 | 1 |
| 80083131e1e3-defd-4496-b5dd-e6100e32e15e | Not Translated (0%) | US Denied Persons List: | US Denied Persons List: |
| 80093131e1e3-defd-4496-b5dd-e6100e32e15e | Not Translated (0%) | Denied Person Entry | Denied Person Entry |
| 80105fee12f3-ec54-4160-8304-19b2a6e113a1 | Not Translated (0%) | 59 | 59 |
| 8011b89422b3-5849-45ee-999e-2ab5a41fe5bf | Not Translated (0%) | 73 | 73 |
| 8012a03f29f2-b81f-4106-a796-32cf687a0020 | Not Translated (0%) | 5 | 5 |
| 8013c7631892-cb62-464b-a0de-8343c3b30803 | Not Translated (0%) | 82 | 82 |
| 80144664be1c-6287-4dc2-906b-5d7c7452f15c | Not Translated (0%) | 64 | 64 |
| 80152cfc849e-ea59-4ee8-ba5f-d912de49651e | Not Translated (0%) | 101 | 101 |
| 80169161ff75-c765-4b57-8157-8de87fc5ddf1 | Not Translated (0%) | 17 | 17 |
| 80177c398f16-3b4e-4c9d-8d1a-7d83da762e32 | Not Translated (0%) | 20 | 20 |
| 8018adf327f8-02fc-42a1-8191-aba98677d7eb | Not Translated (0%) | 14 | 14 |
| 80190915492f-7d95-4662-b2d7-f541ea385ed7 | Not Translated (0%) | 40 | 40 |
| 8020845cf17c-f2b4-490c-a46f-bbacdf8c35a8 | Not Translated (0%) | SPS–SWIFT Messages | SPS–SWIFT Messages |
| 8021e0b9ed19-c0b8-4921-bfd9-f7a306f49351 | Not Translated (0%) | 98 | 98 |
| 80226117f8c9-b64d-4b6a-b17d-69b1a30d6ffc | Not Translated (0%) | 112 | 112 |
| 8023f7201c82-12d7-4e13-9a92-f6169cb4ff1d | Not Translated (0%) | SPS–SWIFT MT103 | SPS–SWIFT MT103 |
| 8024a447eee0-6122-4e12-84ec-2756c801e199 | Not Translated (0%) | 19 | 19 |
| 8025f6264bea-066f-43a7-a6c1-8a6ef556fb7f | Not Translated (0%) | 118 | 118 |
| 8026098f9798-d562-4fd8-b708-8d0e4c61625d | Not Translated (0%) | 96 | 96 |
| 80278c1d964a-5c50-4601-8fee-dbe5177f91fd | Not Translated (0%) | 97 | 97 |
| 8028f791c6a1-14f3-4ab3-97c1-ef66fabd0843 | Not Translated (0%) | 2 | 2 |
| 80293027d3df-ad8a-4cec-a1db-e8803246abc5 | Not Translated (0%) | 48 | 48 |
| 8030def094f1-fa64-4d43-a62c-8bf0f85ea4c7 | Not Translated (0%) | 67 | 67 |
| 8031c5bf7084-de79-402b-922d-223a01ff888d | Not Translated (0%) | 30 | 30 |
| 80327c444aea-e385-4076-b601-81e6e26035d4 | Not Translated (0%) | 94 | 94 |
| 803389620405-4d89-410f-9dad-2eba5bdc32ca | Not Translated (0%) | 66 | 66 |
| 8034f67fc2eb-1bdf-425d-a3c5-caddc75d6453 | Not Translated (0%) | Sanctions Name Screening – Naming Conventions | Sanctions Name Screening – Naming Conventions |
| 8035ecaa75f6-874f-41f6-94a5-f7206483ff2b | Not Translated (0%) | 26 | 26 |
| 80369c645715-69eb-45b3-9772-0f7a6aab2c9a | Not Translated (0%) | 23 | 23 |
| 803735ded335-9eae-4dc0-ba0b-36094fc851cb | Not Translated (0%) | 87 | 87 |
| 8038bced2536-503d-4756-9508-0ad29b0b7395 | Not Translated (0%) | 75 | 75 |
| 8039cba8238f-a9be-44e9-a307-7435e46c0c49 | Not Translated (0%) | 116 | 116 |
| 80404a44288f-4aea-428a-927a-6fab8a5866fd | Not Translated (0%) | 68 | 68 |
| 804144619750-7643-48dd-93c5-16c577d68883 | Not Translated (0%) | 25 | 25 |
| 8042a8bff6ec-2690-4ef8-b97a-44261738917d | Not Translated (0%) | 46 | 46 |
| 80433d1419a5-4786-4cd1-8446-31754c1d438b | Not Translated (0%) | 60 | 60 |
| 804438d167d4-91d6-4293-a22e-965e30100517 | Not Translated (0%) | 43 | 43 |
| 8045baa2a330-a710-4597-b72d-fd9c50559dce | Not Translated (0%) | 92 | 92 |
| 80466f8596d4-3ea3-4cbc-912a-8ebfd0654724 | Not Translated (0%) | 10 | 10 |
| 8047671b7dce-4664-4d7f-9e6e-9957af0b1c0f | Not Translated (0%) | 42 | 42 |
| 804856b8ec1f-1800-4059-8e09-6798f653f6af | Not Translated (0%) | 35 | 35 |
| 804958d14480-356c-49aa-a350-4ac9b85a554b | Not Translated (0%) | 89 | 89 |
| 8050572c31db-689e-40b8-93f2-6f08cd5a27c7 | Not Translated (0%) | 62 | 62 |
| 805173617227-544d-462e-94e8-0374368ae5ef | Not Translated (0%) | 90 | 90 |
| 80521ef7f33f-1c76-4657-b500-ff0d7eb24187 | Not Translated (0%) | 81 | 81 |
| 805356d8bd5a-3e01-48e3-bb2b-2b12ee3017f8 | Not Translated (0%) | 114 | 114 |
| 80540bee8b24-d43d-4078-b740-29da8b71bc76 | Not Translated (0%) | 115 | 115 |
| 8055ca8e4b48-a21f-47db-a998-063eb6d0bc29 | Not Translated (0%) | 113 | 113 |
| 8056f285894a-cdc9-455a-be0d-b84e1a64ab33 | Not Translated (0%) | SPS–SWIFT Messages–MT103 Example | SPS–SWIFT Messages–MT103 Example |
| 80574173e633-8ae8-4199-931d-7c625b02b44d | Not Translated (0%) | 31 | 31 |
| 8058bdaf6430-803a-4510-9a99-5c3ce1578162 | Not Translated (0%) | SPS–SWIFT MT103 | SPS–SWIFT MT103 |
| 8059f86b11c6-bf16-4322-9af9-4ee78fceda30 | Not Translated (0%) | 36 | 36 |
| 8060e7c82590-ad87-4721-acdb-111719ba438f | Not Translated (0%) | 105 | 105 |
| 8061fbe30a91-e8d5-48ff-8688-7aae34beaea9 | Not Translated (0%) | 80 | 80 |
| 8062f874fe69-2f83-4456-a220-064ad628b8a2 | Not Translated (0%) | 79 | 79 |
| 80634e0dc52b-1263-4542-980b-79be350227f7 | Not Translated (0%) | 52 | 52 |
| 80648db94fb8-94cc-42d5-a499-c181787638d9 | Not Translated (0%) | 65 | 65 |
| 806571699cb7-5524-4136-92cc-4318244d591e | Not Translated (0%) | 106 | 106 |
| 806607495a79-f0c6-4e8b-916b-1383a2de38e5 | Not Translated (0%) | 53 | 53 |
| 806703f5ffa2-878d-4ffd-8a7a-6d2a4f662fa1 | Not Translated (0%) | 37 | 37 |
| 8068c63814b1-7df9-4412-9796-00a5c06f4294 | Not Translated (0%) | 88 | 88 |
| 806965e9dcc8-557b-4f85-8634-07d399fa8d03 | Not Translated (0%) | 102 | 102 |
| 807063e3e3f2-2c84-422c-8abc-1537fa60a62c | Not Translated (0%) | 27 | 27 |
| 8071e0468ef4-1c99-4c52-83e9-adfeb464e964 | Not Translated (0%) | 78 | 78 |
| 80721572c581-bef8-493d-84c5-d079882c6623 | Not Translated (0%) | 117 | 117 |
| 80739708b0dd-6e0f-41ae-b559-49e9411b6a86 | Not Translated (0%) | M6-6 | M6-6 |
| 8074b9122890-171f-4698-aabc-bf09596385e8 | Not Translated (0%) | 45 | 45 |
| 8075d6a34ea0-1963-498d-962d-f6dcb59b5ca6 | Not Translated (0%) | 33 | 33 |
| 80767466f7fa-5aae-41e7-a3cc-a1f28de56bdf | Not Translated (0%) | 91 | 91 |
| 8077f47458c0-004e-4d3b-870e-277e17c6ff38 | Not Translated (0%) | 84 | 84 |
| 80784f8e00ee-3c8b-4179-9c19-eeec7778475c | Not Translated (0%) | 18 | 18 |
| 807938b70eae-b6d0-4dfb-af65-0cc5048ad280 | Not Translated (0%) | 93 | 93 |
| 80809e57d3e7-4109-433d-aee0-94884a3720f9 | Not Translated (0%) | 104 | 104 |
| 8081ca487604-0a73-46a1-99ae-278af7e91fbb | Not Translated (0%) | 21 | 21 |
| 80826349b6b9-fb48-4d59-9684-1171335cc6d6 | Not Translated (0%) | 3 | 3 |
| 8083ce00a28d-13d5-42b8-a1e6-cf7631425c61 | Not Translated (0%) | Answer Key | Answer Key |
| 808493403c2e-38c5-442f-9263-11a776580a06 | Not Translated (0%) | 50 | 50 |
| 8085098308e1-4ac4-4a96-8260-6f846dc19765 | Not Translated (0%) | 41 | 41 |
| 80860283ba31-b537-4d5d-8328-371d6923b896 | Not Translated (0%) | 61 | 61 |
| 8087ddf661f1-8152-42b8-bcee-3499b3a3149d | Not Translated (0%) | 95 | 95 |
| 80882ef33599-4631-41c4-aa13-bc20d3a22490 | Not Translated (0%) | Lists–Target Parties–Individuals–Associations and Linkages | Lists–Target Parties–Individuals–Associations and Linkages |
| 80894dafa644-fadf-48dd-aba3-f8833eec9d4f | Not Translated (0%) | Name Screening | Name Screening |
| 809011a84cc2-beb7-4466-b335-76c9ecdaab7d | Not Translated (0%) | AUSTRAC List | AUSTRAC List |
| 809149f48529-f0d5-462a-9690-3cdfa6286065 | Not Translated (0%) | Sanctions Compliance Policies, Procedures, and Internal Controls | Sanctions Compliance Policies, Procedures, and Internal Controls |
| 8092a1753fba-ddb4-49e4-9524-2a3170f6053b | Not Translated (0%) | Lists–Target Parties–Legal Entities–Other Details | Lists–Target Parties–Legal Entities–Other Details |
| 80930060806b-7378-4f2d-bb19-a7ebb857253e | Not Translated (0%) | Lists–Target Parties–Legal Entities–Identifiers | Lists–Target Parties–Legal Entities–Identifiers |
| 80944c5a8ad6-a966-47ce-96df-2863a7ce4011 | Not Translated (0%) | Lists–Target Parties–Individuals–Passport/National Identification Number | Lists–Target Parties–Individuals–Passport/National Identification Number |
| 8095c76da15f-62cc-488c-9ae0-2df429091ea5 | Not Translated (0%) | Lists–Target Parties–Legal Entities | Lists–Target Parties–Legal Entities |
| 80967976b483-f832-40ce-aa9f-f4fce496cfa6 | Not Translated (0%) | UK Consolidated List | UK Consolidated List |
| 80970adb966f-602d-49cc-bf82-0cc60e98279a | Not Translated (0%) | Lists–Target Parties–Individuals–Other Government “Sanctions” | Lists–Target Parties–Individuals–Other Government “Sanctions” |
| 8098911fd647-d5f4-411e-8176-d46e45e85ed3 | Not Translated (0%) | Sanctions Risk Assessment: | Sanctions Risk Assessment: |
| 8099911fd647-d5f4-411e-8176-d46e45e85ed3 | Not Translated (0%) | Good and Poor Practices | Good and Poor Practices |
| 8100b9e4147d-c717-48ae-a928-517b3f227bdb | Not Translated (0%) | How Screening Works | How Screening Works |
| 81010a4081b6-8bf9-4a5a-b8f6-0a6ba49631a0 | Not Translated (0%) | Complex Corporate Ownership Schemes 2 | Complex Corporate Ownership Schemes 2 |
| 8102c14be18e-9923-495a-8ebb-110b40f42e7d | Not Translated (0%) | Three Lines of Defense | Three Lines of Defense |
| 8103f20844f4-6e36-40d1-8af9-7c9ec9329d5e | Not Translated (0%) | EU Consolidated List | EU Consolidated List |
| 8104a5b235f5-4940-462b-9825-54d78ad27291 | Not Translated (0%) | Lists–Target Parties–Individuals–Names | Lists–Target Parties–Individuals–Names |
| 81050df2fe89-272b-49e1-880a-e6f374162d47 | Not Translated (0%) | Lists–Target Parties–Individuals–Jurisdiction | Lists–Target Parties–Individuals–Jurisdiction |
| 81067f9e8392-e327-4fca-8a83-714711afc273 | Not Translated (0%) | Investigation Process | Investigation Process |
| 810731a3d771-3528-4d13-875c-8cf81579c507 | Not Translated (0%) | Complex Corporate Ownership Schemes 1 | Complex Corporate Ownership Schemes 1 |
| 810835835bce-f939-4db6-b187-a6f48e59d90e | Not Translated (0%) | Screening Practices for Dual-Use Goods | Screening Practices for Dual-Use Goods |
| 8109e491f00f-6b44-4b86-84f2-8e1aed3e7365 | Not Translated (0%) | Student | Student |
| 811022232351-59b2-4cfb-9a6d-71004f937c2d | Not Translated (0%) | Beneficial Ownership: | Beneficial Ownership: |
| 811122232351-59b2-4cfb-9a6d-71004f937c2d | Not Translated (0%) | EU | EU |
| 81129c492993-5e01-42c1-a972-95abbf58e0ec | Not Translated (0%) | Technopromexport Example | Technopromexport Example |
| 81137e017918-80a7-4366-96aa-d9f44ae7da4d | Not Translated (0%) | Inherent Risk Matrix | Inherent Risk Matrix |
| 8114ebadc8ea-0a31-4ccd-8098-4051e88d8c27 | Not Translated (0%) | Why Sanctions Exist | Why Sanctions Exist |
| 81153e0611da-7d4b-49be-af8f-73790a6d48f0 | Not Translated (0%) | SDD—Commercial Banking/Investments | SDD—Commercial Banking/Investments |
| 81164b45a868-58d0-471d-8052-9d3d5aab579d | Not Translated (0%) | Student | Student |
| 8117e13e0bf5-4dc2-420a-a08c-b44364b1244a | Not Translated (0%) | Student | Student |
| 81184ce4ff26-aa27-45f2-9674-d3dba7a17416 | Not Translated (0%) | Perceived Risk — Downstream Services | Perceived Risk — Downstream Services |
| 811940552035-2314-4d10-ad4c-467484dd204f | Not Translated (0%) | Instructor | Instructor |
| 8120b53d7502-c0ff-44a1-acae-15672fd7f7e9 | Not Translated (0%) | Instructor | Instructor |
| 81214f6a65c4-d69c-43c4-8572-1f37e289d501 | Not Translated (0%) | Name Match: | Name Match: |
| 81224f6a65c4-d69c-43c4-8572-1f37e289d501 | Not Translated (0%) | Individual or Entity | Individual or Entity |
| 81236f84abf8-0f81-4f53-9d4c-d530a7a7379a | Not Translated (0%) | SDD—Wealth Management/Private Banking Known Sanctions Risks | SDD—Wealth Management/Private Banking Known Sanctions Risks |
| 812445c28c73-0a12-4a30-885e-623f0e915f7d | Not Translated (0%) | Swift Messaging Mechanics 2 | Swift Messaging Mechanics 2 |
| 81258ed8563f-2724-4bd9-88c6-0533823c151d | Not Translated (0%) | Instructor | Instructor |
| 812612a3032c-5be9-4571-a0ff-e9527cfc5207 | Not Translated (0%) | United Nations Security Council Consolidated List | United Nations Security Council Consolidated List |
| 8127c8c9527f-bbdd-47f2-b48c-f4a50afba581 | Not Translated (0%) | Instructor | Instructor |
| 81283369c352-6442-4b8f-b55c-e79e056d0353 | Not Translated (0%) | Concealment of Identity 2 | Concealment of Identity 2 |
| 812981665ca5-d004-4e53-9c6b-0eb1138773fb | Not Translated (0%) | Transshipment | Transshipment |
| 813082ef26a0-0b5f-4c52-ae6a-56898d49991d | Not Translated (0%) | Concealment of Identity 1 | Concealment of Identity 1 |
| 81316c8fa309-0666-404f-b547-fde665cfbaeb | Not Translated (0%) | SWIFT Messaging Mechanics 3 | SWIFT Messaging Mechanics 3 |
| 813236dc0cf1-ffa6-484f-97e2-d3ed253efe06 | Not Translated (0%) | How Iran Receives Dollars for Oil | How Iran Receives Dollars for Oil |
| 81334bc4c88b-4650-4db4-bf0d-5a63dea98cf0 | Not Translated (0%) | SDD—Key Risk Areas—Customers | SDD—Key Risk Areas—Customers |
| 8134024f9257-857b-43c9-a976-c007d8ca5525 | Not Translated (0%) | Instructor | Instructor |
| 81351d38a774-cb4a-4f13-8e05-aa138556789d | Not Translated (0%) | Illustration of Aggregate Rule—Cascading | Illustration of Aggregate Rule—Cascading |
| 8136941905f3-1817-4041-b993-4850e8261bd1 | Not Translated (0%) | Toll Gates Example | Toll Gates Example |
| 81370929e0ef-8fc5-4981-acfb-714e9deed908 | Not Translated (0%) | Student | Student |
| 81382db59782-e67f-46a3-9765-29243011ec9b | Not Translated (0%) | Student | Student |
| 81396c7ac240-43ba-4214-8570-124d9ace3c5e | Not Translated (0%) | Residual Risk Matrix | Residual Risk Matrix |
| 814007ef7167-d98b-4d3d-ab71-fbc6e315cb6c | Not Translated (0%) | Risk Assessment Formula | Risk Assessment Formula |
| 8141a2036fb8-2437-45a9-b75f-704466187f19 | Not Translated (0%) | SWIFT Messaging Mechanics 1 | SWIFT Messaging Mechanics 1 |