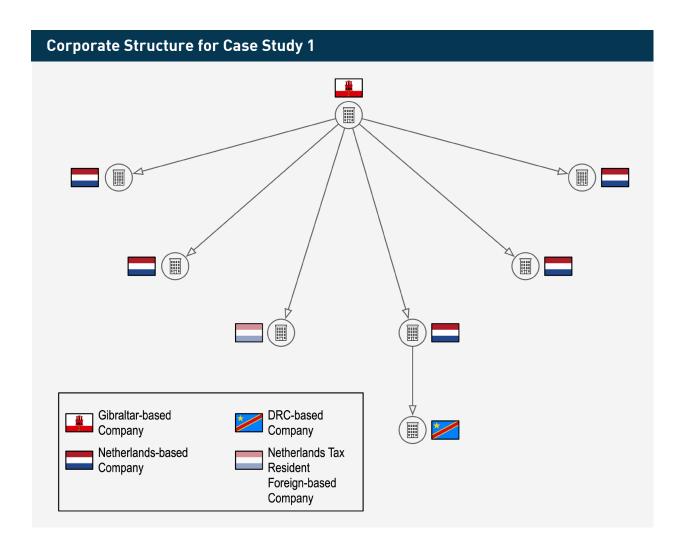


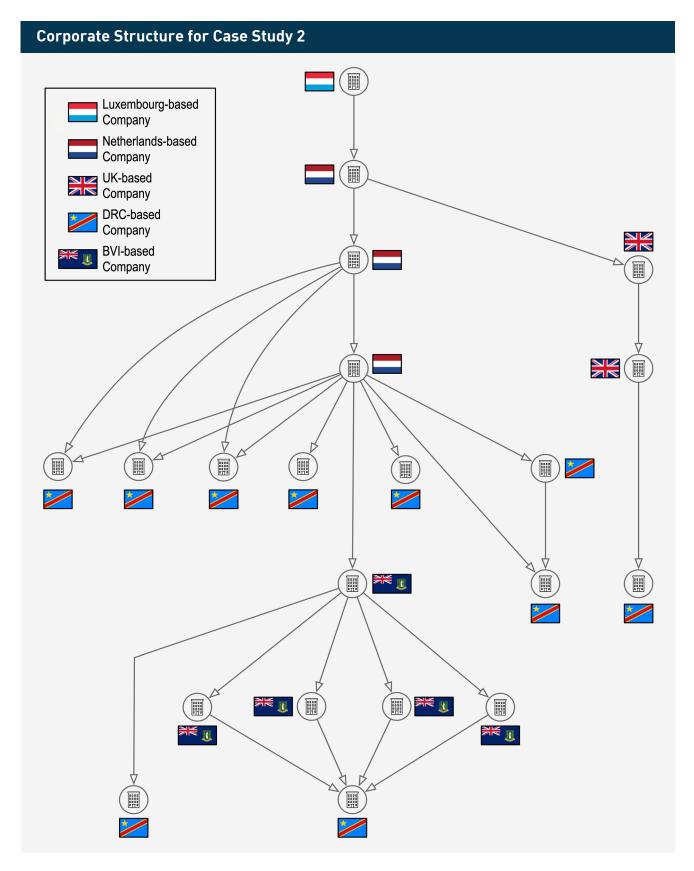
Given the close relationship between this individual and the Congolese government, there have been actions that are indicative of significant conflicts of interest. This financial activity continues to pose a threat to the Dutch financial sector as long as the individual maintains their corporate presence in the Netherlands.



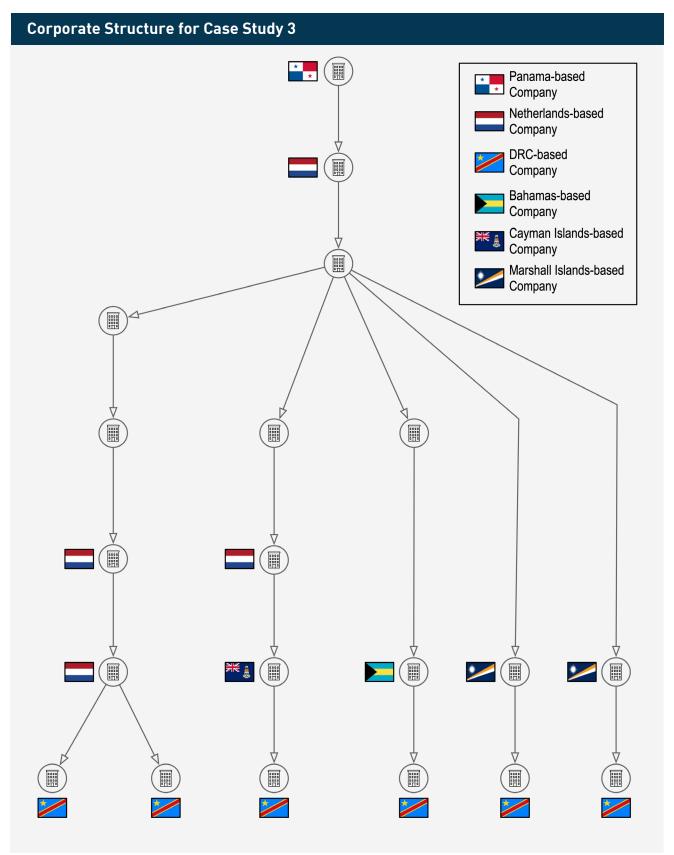
Trends and methods

- Industries: Mining, oil, natural resources, transportation, and logistics
- **Methods:** Bribery of PEPs, use of multi-layered complex corporate structures, creation of multiple subsidiaries with links to secrecy jurisdictions
- **Mechanisms:** Multinational corporates, private companies limited by liability, including holding companies and subsidiaries
- Countries: The Netherlands, Gibraltar, the DRC











Risk factors

- A large number of linked corporations listed as beneficial owners of an entity in a high-risk jurisdiction
- Creation of a large number of subsidiaries by a small number of linked entities
- PEPs or former PEPs from countries representing a high risk of corruption listed as directors and controllers
- Directors have close personal business relationships with PEPs or family members of PEPs in countries representing a high risk of corruption

