

PEPs and Sanctions Information

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1 Politically Exposed Persons (PEPs)

1.1 C6 Approach to PEP Definition

The general PEP Definition of C6 Intelligence Information Systems Ltd. (C6) is primarily based on the FATF version but it also draws from United Nations Convention Against Corruption (UNCAC), the 4th EU Money Laundering Directive, Joint Anti Money Laundering Steering Group (JMLSG) and the Wolfsberg Group:

- current or former senior official in the executive, legislative, administrative, military, or judicial branch of a foreign government (elected or not)
- a senior official of a major foreign political party
- a senior executive of a foreign government owned commercial enterprise, being a corporation, business or other entity formed by or for the benefit of any such individual
- an immediate family member of such individual; meaning spouse, parents, siblings, children, and spouse's parents or siblings
- any individual publicly known (or actually known by the relevant financial institution) to be a personal or professional associate.

While such definition is a valid source of mandate for financial institutions to seriously consider, in order to comply with relevant regulations, C6 considers it not sufficiently elaborate for its clients to conveniently refer to the PEP verification process in a comprehensive approach.

To address this issue, C6 has set up in-house PEP Tiering guidelines that serve as the research framework for its analysts to follow consistently throughout their systematic research and *ad hoc* due diligence investigations. While several categories have to be treated with discretion in certain contexts, the general guidelines should cover most governance systems spanning all jurisdictions in the world. In accordance with the designated risk based approach¹, the categories are divided into different risk levels, which also form C6's systematic data development and maintenance procedure:

PEP Tier 1	PEP Tier 2
<ul style="list-style-type: none">• Heads of state and government (including Royal families)• Members of government (ministers, deputies, state and under-state secretaries) at national and sub-national levels in case of federal states (e.g. Florida in the US, Bavaria in Germany, Johor in Malaysia, Lagos in Nigeria, Goa in India etc) and provinces in China (e.g. Henan); President and College of Commissioner of the European Commission.	<ul style="list-style-type: none">• Members of legislative (e.g. aldermen, councillors) and executive (e.g. prefects) bodies at regional, provincial, cantonal or equivalent levels (below the level of states in case of federal jurisdiction)• Judges, justices, magistrates, prosecutors, attorneys in courts with jurisdiction at regional, provincial or equivalent level.• Senior officials of the military, judiciary, law enforcement agencies, central banks and

¹A risk based approach requires researchers to allocate resources on a priority basis to investigate and profile high risk individuals and entities. Individuals and entities that are sanctioned by competent authorities are also considered high risk (for more details please refer to the latest Transparency International's Corruption Perception Index, FATF High Risk Jurisdiction and Non-Compliant Countries, and Basel AML Index). Once the high risk categories have been investigated, any free resources should then be utilised to deal with the individuals and entities falling in the medium risk category.

<ul style="list-style-type: none"> Members of Parliament or similar legislative bodies (at national and sub-national level in case of federal states – same as above); Members of the European Parliament. Heads and top commanders of military and law enforcement and their deputies. Heads and members of supreme courts, of constitutional courts or of other high-level judicial bodies whose decisions are not subject to further appeal, except in exceptional cases; similar for EU Court of Justice. Heads and members of courts of auditors (including EU Court of auditors) and of the boards of central banks (including the European Central Bank); Top ranking officials of mainstream political parties (e.g. party leaders and members of governing bodies) and only the heads/deputy heads of minor political parties (without representation in parliament) 	<p>other state agencies, authorities and state bodies (e.g. high ranking civil servants, director generals, directors, heads of units, secretaries (permanent, principal, joint secretaries etc)</p> <ul style="list-style-type: none"> Heads and senior members of mainstream religious groups (e.g. archbishop, patriarch, cardinal, bishop, imam, rabbi) Ambassadors, general consuls, high commissioners, permanent representatives, head of missions and their deputies, charge d'affairs. Chairmen, secretary generals, directors, deputy directors and members of the board or equivalent function of international / regional organisations (e.g. UN, EU, World Bank, EBRD, OAS, Arab League, ASEAN, CARICOM etc); Mayors of capital cities (e.g. London, New Delhi, Paris, New York, Rio de Janeiro) and Head of Cities which are directly appointed and answerable to the Chinese central government;
PEP Tier 3	PEP Tier 4
<ul style="list-style-type: none"> Presidents/Chairperson and board members of state owned businesses and organisations Advisers, heads of cabinet and similar roles of senior officials of the military, judiciary, law enforcement, central banks and other state agencies, authorities and state bodies (designation/level to be determined depending on country ML/TF and corruption risks profile and administration structure); Heads and board members / senior officials of Trade Unions. In case of Chambers of Commerce and Charities a risk based approach is followed. Presidents, secretary generals, directors, deputy directors and members of the board or equivalent function of international NGOs (e.g. Oxfam, Amnesty, Transparency International etc); Senior civil servants at regional/provincial or equivalent levels; Middle ranking diplomats (minister-counsellors, councillors, 1st Secretaries and 2nd Secretaries); Alternate/deputy members of parliament/senate (not currently occupying seat) 	<ul style="list-style-type: none"> Mayors and members of local councils at municipal, town, village or equivalent levels (i.e., below regional, provincial, cantonal and other levels not captured elsewhere). Senior officials of administrative bodies at local levels (directors/secretaries of city governments) Low ranking diplomats (e.g. 3rd Secretaries, attachés or similar low level roles). Lower ranking officials of major parties and officials of minor political parties (except leaders) not elsewhere captured; simple party members / unelected candidates to be excluded.
<p>Notes on PEPs by association:²</p> <ul style="list-style-type: none"> Family members and personal associates of PEPs. Individuals who are not PEP in their own capacity but serve on a board of directors with PEPs. 	

² FATF defines Close Associates as follows: (known) (sexual) partners outside the family unit (e.g. girlfriends, boyfriends, mistresses); prominent members of the same political party, civil organisation, labour or employee union as the PEP; business partners or associates, especially those that share (beneficial) ownership of legal entities with the PEP, or who are otherwise connected (e.g., through joint membership of a company board). In the case of personal relationships, the social, economic and cultural context may also play a role in determining how close those relationships generally are. (FATF Guidelines, 2013)

1.2 PEPs in State-Owned Enterprises (SOEs)

Furthermore, C6 has adopted OECD definition of state owned enterprises (SoEs) and has developed a risk-matrix to enable identification of SoE linked PEPs:

High Risk – Tier 1 SoEs	Medium to High Risk – Tier 2 SoEs
<ul style="list-style-type: none"> Businesses which are 51%-100% state owned 	<ul style="list-style-type: none"> <=50% state owned and where government is represented on the company's board
Medium Risk – Tier 3 SoEs	Low Risk – Tier 4 SoEs
<ul style="list-style-type: none"> Subsidiaries of high risk and medium to high risk businesses as long as these subsidiaries also fit the criteria defined therein relating to the ownership structure and representation on the board Companies in which % of government control is not defined but there is evidence of state ownership and the government is involved in the company through its representation on the board 	<ul style="list-style-type: none"> State owned/controlled companies at local or municipal government level regardless of % of ownership as long as government is represented on the company's board

Where government has investment equal to or less than 50% or where the ownership is unclear and there is no board representation in both cases then profiling maybe required depending on the socio-economic and political set up of the country in question.

1.3 PEP Data Resources

Our sources include official sites such as government or national assemblies and foreign offices.

Systematic Data-entry:

- CIA World Leaders
- CIA World Factbook
- Rulers articles and other databases continually monitored to additional information
- Gov't/Official websites covering all levels of PEPs
- Other useful open sources, e.g. those independent from the state control

Regular Updates:

- Selected media websites for regular (daily) media checks

Where English sources prove insufficient to account for the personal traits and affiliations of certain PEPs, foreign sources (in foreign/local languages) would be relied upon to obtain fresh information and bridge the gaps between inconsistent information.

2 Sanctions

All global sanction lists are continuously monitored and any updates / releases are reflected in the C6 database immediately.

2.1 United Kingdom (UK): Office of Financial Sanctions Implementation (OFSI). HM Treasury

- Consolidated list of financial sanctions targets (Asset Freeze Target List)
- Current Regimes
 - Afghanistan
 - Belarus
 - Burundi
 - Central African Republic
 - Democratic Republic of the Congo
 - Egypt
 - Iran (Human Rights)
 - Iran (Nuclear Proliferation)
 - Iraq
 - ISIL (Da'esh) and Al-Qaida
 - Libya
 - Mali
 - North Korea (Democratic People's Republic of Korea)
 - Republic of Guinea
 - Republic of Guinea-Bissau
 - Somalia
 - South Sudan
 - Sudan
 - Syria
 - Terrorism and Terrorist Financing
 - Tunisia
 - UK Freezing Orders
 - Ukraine (Misappropriation and Human Rights)
 - Ukraine (Sovereignty and Territorial Integrity)
 - Yemen
 - Zimbabwe
- Proscribed Terrorist Groups or Organisations (Issued by the United Kingdom Home Office)

2.2 United States (US): Department of the Treasury - Office of Foreign Assets Control (OFAC)

- Specially Designated Nationals (SDN) List
- OFAC Sanctions Programs
 - Balkans-related Sanctions
 - Belarus Sanctions
 - Burundi Sanctions
 - Countering America's Adversaries Through Sanctions Act of 2017 (CAATSA)
 - Central African Republic
 - Counter Narcotics Trafficking Sanctions
 - Counter Terrorism Sanctions
 - Cuba Sanctions
 - Cyber Related Sanctions
 - Democratic Republic of the Congo-related Sanctions
 - Iran Sanctions
 - Iraq-related Sanctions
 - Foreign Sanctions Evaders List (FSE List)
 - Lebanon-related Sanctions
 - Libya Sanctions
 - List of Foreign Financial Institutions Subject to Part 561 (the "Part 561 List")
 - List of Persons Identified as Blocked Solely Pursuant to Executive Order 13599 (the 13599 List)
 - Magnitsky Sanctions
 - Non-Proliferation Sanctions
 - Non-SDN Palestinian Legislative Council List
 - Non SDN Iranian Sanctions List
 - North Korea Sanctions
 - Rough Diamond Trade Controls
 - Sectoral Sanctions Identifications (SSI) List
 - Somalia Sanctions
 - Sudan and Darfur Sanctions
 - South Sudan Related Sanctions
 - Syria Sanctions
 - Transnational Criminal Organizations
 - Ukraine/~~Russia~~ Related Sanctions
 - Venezuela-Related Sanctions
 - Yemen Related Sanctions
 - Zimbabwe Sanctions

- Former Liberian Regime of Charles Taylor Sanctions (Archive of Inactive Sanctions Programs – Program Ended on 12 December 2015)

2.3 US: Department of State - Bureau of International Security & Non-Proliferation Sanctions

- United States Department of State

- Terrorist Exclusion List

Enacted under Section 411 of the USA PATRIOT ACT of 2001

- Non-Proliferation Sanctions List

The Non-Proliferation List is a comprehensive list of all US Department of State-sanctioned entities incorporating:

- Missile Sanctions laws (The Arms Export Control Act and The Export Administration Act)
- Executive Order 12938 (Including Amendments Executive Orders 13094 and 13382)
- Iran, North Korea, and Syria Non-Proliferation Act Sanctions (INKSNA)
- Executive Order 13382
- Chemical and Biological Weapons Control and Warfare Elimination Act (CBW Act)
- Nuclear Proliferation Prevention Act
- Export-Import Bank Act
- Transfer of Lethal Military Equipment

2.4 United Nations (UN): Security Council Committees

- Resolutions 751 & 1907 – Somalia & Eritrea
 - Arms Embargo (Consolidated List)
 - Travel Ban (Consolidated List)
 - Assets Freeze (Consolidated List)
- Resolution 1267 & 1989 & 2253
 - ISIL (Da'esh), Al-Qaida and associated Individuals and Entities
 - Consolidated List
- Resolution 1518 – Iraq and Kuwait
 - List of Individuals
 - List of Entities
- Resolution 1533 - Democratic Republic of the Congo
 - Consolidated Travel Ban and Assets Freeze List
- Resolution 1591 – Sudan
 - Consolidated Travel Ban and Assets Freeze List
- Resolution 1636 – Lebanon
 - Consolidated Travel Ban and Assets Freeze List
- Resolution 1718 – Democratic People's Republic of Korea
 - List of Designated Entities, Goods and Individuals
- Resolution 1970 – Libyan Arab Jamahiriya
 - Consolidated Travel Ban and Assets Freeze List
- Resolution 1988 – Taliban and associated Individuals and Entities
- Resolution 2048 – Guinea-Bissau
 - Consolidated Travel Ban and Assets Freeze List
- Resolution 2127 & 2134 – Central African Republic
 - Arms embargo, travel ban and asset freeze
- Resolution 2140 - Yemen
- Resolution 2206 (Concerning South Sudan)
- Resolution 2374 (Concerning Mali)

2.5 European Union (EU):

- Consolidated list of persons, groups and entities subject to EU financial sanctions
- Restrictive Measures (Sanctions) in Force
 - Afghanistan
 - Al Qaeda and ISIL (Da'esh)
 - Belarus
 - Bosnia and Herzegovina
 - Burma
 - Burundi
 - Central African Republic
 - China
 - Democratic Republic of Congo
 - Egypt
 - Eritrea
 - Republic of Guinea (Conakry)
 - Guinea-Bissau
 - Haiti
 - Iran
 - Iraq
 - Democratic People's Republic of Korea (North Korea)
 - Lebanon
 - Libya
 - Mali
 - Moldova
 - Myanmar (Burma)
 - Russian Federation
 - Serbia and Montenegro
 - Somalia
 - South Sudan
 - Sudan
 - Syria
 - Terrorist Groups (Foreign Terrorist Organisations)
 - Tunisia
 - Ukraine
 - USA (United States of America)
 - Yemen
 - Yugoslavia (Serbia and Montenegro)
 - Zimbabwe

2.6 Defence Trade Controls

- United States Bureau of Industry and Security (BiS)
 - Denied Person List
 - Entity List
 - Unverified List
- United States Department of State
 - Statutorily Debarred Parties List
 - Administratively Debarred Parties List
- United States Department of the Treasury Financial Crimes Enforcement Network (FinCEN)
 - Section 311 - Special Measures for Jurisdictions, Financial Institutions, or International Transactions of Primary Money Laundering Concern

2.7 Other Unilateral Sanctions and Regulatory Enforcement Lists

The sanction lists issued by the government and agencies listed in section 2.1 to 2.6 are frequently reviewed and consequently individuals and entities may be removed from such lists. It is C6's practice to identify such individuals and entities as "previously sanctioned" rather than completely removing the names from the database.

In addition to the above mentioned international sanctions, C6 also monitors other national or unilateral sanctions which are only enforced locally rather than globally. Individuals and entities featuring on such lists may not be flagged as sanction but are identified as being on the local sanction list. This approach enables C6 customers to easily distinguish between those who are subjected to international sanctions and the local ones.

The lists are updated as soon as alerts are received from the appropriate agencies. Additionally, regional teams carry out daily media checks to ensure all sanction related news are timely updated.

The list below is an illustration of C6's coverage and not intended to provide a full disclosure of all sources regularly monitored by C6,

- African Development Bank - List of Debarred Entities
- Albanian Customs Company Notifications
- Asian Development Bank Sanctioned Entities
- Australia - Listed terrorist organisations
- Austrian Financial Market Authority - List of Countries and Sanctions
- Bahamas Central Bank Warning Notices
- Belgian Financial Services and Markets Authority
- Belize International Financial Services Commission - Warning Notices
- Canada DFAT Consolidated List of Sanctions
- Canada Government of Quebec - Autorité des Marchés Financiers (AMF) – Alerts
- Canada Office of the Superintendent of Financial Institutions - Warning Notices Section

- Canada OSFI Designated Individuals and Entities - Terrorism Financing
- Canada Public Safety - Currently Listed Terrorist Entities
- China Ministry of Public Security CNMPS Terrorist List
- China CSRC – Banned from entering market
- China National Bureau of Corruption Prevention – Supreme People’s Procuratorate of China (CSPP) Anti Bribery and Corruption News
- China – Hubei Songci Public Security Bureau Wanted List
- Costa Rica - Superintendencia General de Valores - Alerts
- Cyprus Securities and Exchange Commission CYSEC - Decisions and Warnings
- Egyptian Exchange: Hot Links - Prohibited List
- El Salvador - Search Banned Providers/Inhabilitados
- European Bank for Reconstruction and Development (EBRD) - Ineligible entities
- France Individuals Subject to Asset-freezing measures
- French Central Bank (Banque de France) Commission Bancaire - Public Warnings
- French National Terrorist Freeze
- Germany - Financial Sanctions List
- Germany - Forbidden Organisations
- Germany - Insolvencies
- Germany - Precautionary Proxies
- Greece Hellenic Capital Market Commission: Investor warnings
- Guatemala - Search Banned Providers/Inhabilitados
- Hong Kong Joint Financial Intelligence Unit Terrorist List
- Hong Kong SFC – Unlicensed Entities
- India Securities and Exchange Board of India (SEBI): Enforcement Actions
- Indian Ministry of Home Affairs - Banned Organisations
- Inter-American Development Bank (Banco Interamericano de Desarrollo, BID) - Sanctioned Firms and Individuals
- Inter-American Development Bank Sanctioned Firms and Individuals
- Ireland Central Bank: Warnings and Press Releases
- Israel Ministry of Justice - Terrorist Organisations
- Israel Securities Authority: Regulatory actions/enforcement
- Italy CONSOB (Commissione Nazionale per le Società e la Borsa) - Investors Warnings
- Japan Asset-freezing measures: Terrorism list
- Japan End User list
- Japan Ministry of Finance - Economic Sanctions
- Latvia Financial and Capital Market Commission: Financial Fraud
- Liechtenstein Financial Market Authority (Finanzmarktaufsicht) - Warning Notices and Indications
- Lithuania Financial and Capital Market Commission - Financial Fraud
- Malaysia Labuan Offshore Financial Services Authority - Licence Revocations
- Malta Financial Services Authority - Warnings
- Mauritius International Financial Centre - Being Supervised
- Mexico – Suppliers, Contractors Sanctioned
- Mexico Superior Audit of Federation (Auditoria Superior de Federacion, ASF)
- National Bank of Slovenia Warnings
- Netherlands Antilles Bank van de Nederlandse Antillen - Warning Notices
- Nicaragua – Sanctions
- Pakistan Supreme Audit Court - Investor Warnings
- Paraguay - Search Banned Providers/Inhabilitados
- Poland Financial Supervision Authority - Warnings
- Polish Public Warnings - Polish Financial Supervision Authority
- Qatar Financial Centre Authority - Regulatory actions/enforcement

- Russia - Unified list of terrorist organizations
- Russian Central Bank – Revoked licenses of financial markets experts
- Russian Central Bank - Suspended Banking Professionals- information about entities, CEO's and board members
- Russian Central Bank- Revoked licences for securities and commodity market
- Saint Kitts and Nevis Financial Services - Warnings
- Saudi Arabia Capital Market Authority - Regulatory actions/enforcement
- US - Securities and Exchange Commission - Enforcement Actions
- Serbian Public Warnings - Serbian Securities Commission
- Seychelles - Financial Services Authority
- Monetary Authority of Singapore (MAS) - Lists of Designated Individuals and Entities
- Slovakia National Bank (Narodna Banka Slovenska) - Warning and announcements
- Slovenian Public Warnings - Slovenian Securities Market Agency
- South Africa Office of the Ombudsman for Financial Services - Determinations Section
- South Africa Competition Tribunal
- South Africa National Credit Regulator - Investigation and Enforcement
- South Africa Ombudsman for Long-Term Insurance - Final Determinations
- Sri Lanka - List of Proscribed groups and entities
- St. Vincent and the Grenadines Financial Services Authority – Warnings
- Stolen Asset Recovery Initiative
- Swiss Federal Department of Economic Affairs
- Swiss State Secretariat for Economic Affairs - Terrorism list
- Tanzania Public Procurement Regulatory Authority (PPRA) - Blacklisted firms and News
- The Regional Council for Public Savings and Financial Markets of West Africa
- Trinidad & Tobago Financial Intelligence Unit
- Tunisia Conseil du Marché Financier (CMF) - Avis et decisions
- Turkey Designated Persons list
- Ukraine State Commission for Regulation of Financial Services Markets Warnings
- United Kingdom Solicitors Regulation Authority - Regulatory Decisions
- Vatican Financial Intelligence Authority - List of designated subjects
- World Bank - Listing of Ineligible Firms & Individuals

About C6 Intelligence Information Systems Limited

C6 Intelligence Information Systems Limited ("C6 Intelligence", "C6") is a leading provider of global intelligence information on both individuals and companies through the C6 Database and bespoke research projects. C6 provides Enhanced Due Diligence (EDD), Know Your Customer (KYC), and Anti-Money Laundering (AML) checks and solutions for companies worldwide.

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