



blockdraw

AML / CFT Policy

V1.0

Business class security and Integrity combined with the
verifiability and trustless capability of the blockchain.



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1. INTRODUCTION

Whilst no such legal or regulatory requirement exists for an ICO, BlockDraw follows for its ICO the most stringent AML/CFT standards.

We specifically chose to follow the guidance of the UK Joint Money Laundering Steering Group [JMLSG] (<http://www.jmlsg.org.uk>), which is made up of the leading UK Trade Associations in the UK Financial Services Industry, while at the same time ensuring consistency with the BVI Anti-Money Laundering and Terrorist Financing Code of Practice

The aim of JMLSG is to promulgate good practice in countering money laundering and to give practical assistance in interpreting the UK Money Laundering Regulations. This is primarily achieved by the publication of industry guidance.

The JMLSG publication on which BlockDraw based our ICO AML/CFT controls and procedures is entitled “**Prevention of money laundering/combating terrorist financing - GUIDANCE FOR THE UK FINANCIAL SECTOR**”, issued in 3 parts in June 2017, amended in Dec 2017, and approved by the Board of JMLSG:

<http://www.jmlsg.org.uk/download/10006>

2. MONEY LAUNDERING REPORTING OFFICER (MLRO)

The MLRO must (i) have a diploma with post-qualification experience of not less than 3 years; (ii) be 'fit and proper' for carrying out the role; (iii) possess a broad knowledge of anti-money laundering and terrorist financing matters; (iv) have a good appreciation and understanding of BVI laws relating to money laundering and terrorist financing; and (v) possess the ability to make independent analytical decisions and not be easily susceptible to undue influence.

BlockDraw's MLRO is appointed by the Board and reports to the CEO, thus maintaining direct and regular access to the Board. Such appointment must be notified to the BVI Financial Investigation Agency and the FSCgot

BlockDraw's MLRO:

Konstantinos Despotakis, PhD

COO

Ex Deputy Director Compliance Alderney Gambling Control Commission

BlockDraw Capital Ltd

Folio Chambers, PO Box 800

Road Town, Tortola

British Virgin Islands

email: kd@BlockDraw.it

In their absence, the MLRO is replaced by the **Nominated Officer (NO)**, also appointed by the Board.

BlockDraw's NO:

Darin Oliver, founder

BlockDraw Capital LTD

Folio Chambers, PO Box 800

Road Town, Tortola

British Virgin Islands

email: support@blockdraw.it

The MLRO and the NO maintain an awareness of the AML/CTF legislation and / or global developments in the sector, by participating in relevant conferences and seminars. Having authority to access directly all company records and being responsible for accessing on behalf of BlockDraw external information, such as sanctions lists, they are well equipped to perform their duties.

The MLRO is responsible for developing and implementing the company's AML/FT controls and procedures, receiving ML/FT suspicions from staff, evaluating such suspicions and submitting those deemed substantiated to competent authorities.

More specifically, MLRO's responsibilities include:

- Ensure that a risk-based AML/CFT approach is undertaken by BlockDraw, in particular in respect of customer due diligence (CDD)

- Record and investigate any instances of suspicious activity concerning investors to determine whether they constitute instances of money laundering and/or other serious suspicious activities
- Plan and co-ordinate induction training for all new employees of BlockDraw on key regulatory areas
- Plan and co-ordinate refresher training, at a minimum annually, for all employees of BlockDraw
- Keep records, for at least 5 (five) years, of the following Board minutes and other documents in relation to company's (a) ML/TF risks and (b) AML/CFT compliance reviews

The NO's job description is identical to that of the MLRO.

3. RECORD KEEPING

BlockDraw's policy is to keep all records for such period as recommended by relevant regulations or authorities or as otherwise determined by BlockDraw as necessary to comply with AML/CFT standards. Records are kept in electronic format are stored on secure drives that are readily accessible by the MLRO and the NO.

It is the responsibility of the MLRO to provide copies of transaction documents or Customer due diligence information when it is required by any enactment, rule of law or court order and keep track of such information, when it was provided and to whom.

4. UN, EU, AND OTHER SANCTIONS

To ensure compliance with UK Terrorism Laws¹ t Law and the 4th EU AML/CTF directive² BlockDraw, in cooperation with provider c6³ checks against PEPs and sanctions lists; see the Attachment at the end of this document.

PROSPECTIVE CUSTOMER'S REGISTRATION AND VERIFICATION

5. AGREEMENT

BlockDraw's registration process includes the prospective customer's (i.e. prospective investor's) agreement to BlockDraw's ICO T&Cs. Specifically, the prospective customer cannot complete their ICO registration unless they click on a tick-box confirming such agreement. By clicking on such tick-box they also agree with BlockDraw's Privacy Policy.

¹ <https://www.gov.uk/government/collections/counter-terrorism-and-security-bill>

² http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:JOL_2015_141_R_0003&from=ES

³ <https://www.c6-intelligence.com/>

6. ICO TERMS AND CONDITIONS (ICO T&CS)

BlockDraw's ICO T&Cs can be found on BlockDraw's website here: www.blockdraw.it

7. PRIVACY

BlockDraw's ICO is to be operated in compliance with the Privacy requirements of the UK Data Protection Act: <http://www.legislation.gov.uk/ukpga/1998/29/contents>

BlockDraw's ICO registration process includes the prospective customer's agreement to the COMPANY'S Privacy Policy, as per section **4. Agreement** above.

BlockDraw's Privacy Policy is published on its ICO website: www.blockdraw.it.

In case of inconsistency between Privacy Policy in English and another language, Privacy Policy in English prevails.

8. CUSTOMER DUE DILIGENCE (CDD)

BlockDraw follows a risk-based CDD approach.

Key risk factors would arise if a customer:

- (a) resided in a country or territory that does not apply or insufficiently applies the FATF Recommendations
- (b) were a politically exposed person (PEP)
- (c) were included on international sanctions lists as per **UN, EU and Other Sanctions**, as per 3 above

BlockDraw has chosen to not accept customers that fall under any of (a), (b) or (c) above, thus eliminating any related ML/TF risks.

Item (a) is addressed by blocking registrations from:

FATF high-risk jurisdictions

- Democratic People's Republic of Korea (DPRK)

FATF jurisdictions with strategic deficiencies

- Ethiopia
- Iraq

- Serbia
- Sri Lanka
- Syria
- Trinidad and Tobago
- Tunisia
- Vanuatu
- Yemen

Items (b) and (c) are addressed by use of respective intelligence databases of c6⁴, already mentioned above.

Customer identification: customer identification data are submitted on registration.

Customer verification (CDD): for clarity, BlockDraw:

- accepts customers who are not individuals (legal bodies or trusts)
- will permit an employee of BlockDraw to register as a customer

a. INDIVIDUALS (PHYSICAL PERSONS)

In order to successfully complete registration and be included on BlockDraw's 'whitelist' for the forthcoming ICO, prospective investors, after having their cell-phone number and email address verified, submit scanned images of (a) a valid photo-ID document issued by government (such as passport, driving licence, national ID) and (b) a proof of their

⁴ <https://www.c6-intelligence.com/>

residential address (such as a utility bill or bank statement, issued up to 3 months before the date of registration).

The scan of their photo-ID is sent in real time over API to ID documents control experts AriadNext⁵ who, also in real time:

- i. verify that the photo-ID is genuine, not forged in any way
- ii. retrieve any and all machine-readable info, importantly Name, Surname and DOB
- iii. compare the image of the photo-ID's photo to an image captured by a web app on the registrant's smart phone and verify if the two images are 'similar enough'

The results of checks i - iii above are transferred in real time to BlockDraw, where the following controls apply:

- i. if a FAIL is returned the individual is EXCLUDED from the ICO.
- ii. if such data do not match their counterparts the registrant key-entered on BlockDraw's registration system and this is also visually confirmed by the MRO, the individual is EXCLUDED from the ICO.
- iii. if a FAIL is returned the individual is given the opportunity to submit an additional piece of photo-ID and if this check fails again, the individual is EXCLUDED from the ICO.

Further AML/CFT checks apply for individuals who (a) commit to buy \$100,000 worth of coins or (b) for which BlockDraw has suspicions about source of wealth or identity:

⁵ <https://www.ariadnext.com>

(a) they are requested to submit evidence on the source of their wealth and funds and their registration cannot be completed prior to their successfully submitting evidence that BlockDraw will consider to be suitable and adequate, including (but not limited to):

- Bank statements demonstrating deposit/gifted monies from savings or gifts
- Audited company accounts / dividend statements for profits or dividends from a company
- Statements showing settlement of a sale of investments or property
- Annual income tax statements
- Payslip (dated within the last 3 months)
- Closing statement or letter from life assurance policy provider if matured or surrendered
- Court order or signed letter from solicitor for a court award

(b) they are requested to submit duly certified copies of their photo ID and proof of residence (collectively referred to as DD documents)

Unless such individuals submit suitable and adequate evidence on the source of their wealth and funds and also duly certified copies of DD documents, they are EXCLUDED from the ICO.

b. LEGAL BODIES OR TRUSTS (COLLECTIVELY REFERRED TO AS “COMPANIES”

As already indicated, BLOCKDRAW will accept “companies” as customers, who must also successfully undergo CDD and eventually be whitelisted.

The registration of “companies” for the BlockDraw ICO can be undertaken by an individual who has authority to do so.

The “company” registration and CDD process is as follows:

- The individual with authority to register the “company” for the BlockDraw ICO, follows the process under 7.1 above
- In addition to submitting their personal information, they confirm:
 - the legal name of the “company” they represent
 - that they have authority to represent said “company”
 - the “company’s” contact information
- Blockdraw is then automatically prompted by the system that a “company” has requested registration for the ICO and contacts said “company” to request the information that is necessary for the “company’s” CDD
- Such information:
 - generally includes “company” documents, details for UBOs that hold at least 10% (ten per cent) interest in the “company”, the Board members and/or persons that influence the “company’s” management.
 - varies depending on type of “company”, where BlockDraw follows the standards of the **Guidance for the UK Financial Sector, JMLSG “Prevention of money laundering/ combating terrorist financing”** as well as the BVI Anti-Money Laundering and Terrorist Financing Code of Practice to cover the below cases:

Regulated financial services firms subject to the ML Regulations (or equivalent)
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Other firms subject to the ML Regulations (or equivalent)
Corporate customers (other than regulated firms)
Partnerships and unincorporated businesses
Public sector bodies, governments, state-owned companies and supranationals
Sovereign Wealth Funds
Pension schemes
Charities, church bodies and places of worship
Other trusts and foundations
Clubs and societies

- As part of the “company” CDD, BlockDraw identifies individuals that have to undergo personal CDD
- If BlockDraw does not find any adverse information about the “company”, establishes that all “company” documents are in order and that all “company” individuals identified as having to undergo personal CDD do so successfully, the “company” is allowed to participate in the ICO

c. POLITICALLY EXPOSED PERSONS

BlockDraw identifies customers suspected as PEPs on registration (whether as private individuals or as relevant persons associated with “companies”) by using related automated services of c6. See also Attachment at the end of this document.

Due to the limited information matched per customer by any PEP verification provider, when BlockDraw receives a ‘potential PEP alert’ it needs to verify if it is true or false. Each potential match is investigated by the MLRO to:

- Identify and disregard obvious 'false' cases (e.g. alert was for Mr. XYZ of the UK but Mr. XYZs of BlockDraw are all in the UK; Mr. XYZ is a high government official but the Mr. XYZs of BlockDraw are between 19 and 21 years of age)
- undertake various electronic checks using information available in the public domain including various web resources and social media
- conclude if the potential match is indeed a PEP
- EXCCLUDE the proven PEP from the ICO

9. REGISTRATIONS PER INDIVIDUAL OR "COMPANY"

BlockDraw has controls in place that prevent the same individual or "company" to register more than once for its ICO.

10. ATTACHMENT

- C6 PEP and SANCTIONS CONTROLS

REVISION HISTORY

Revision	Author	Date	Status and Description
1.0	Administrator	Apr 24, 2018	AML / CFT POLICY

PEPs and Sanctions Information

7 November 2017

C6. An Acuris Company.

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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

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