



### **Global Freight Forwarders Require Global Due Diligence**

Risk of sanctions violations, bribery and corruption, and sanctioned parties are top of mind for compliance professionals in the shipping industry. Frequent registration changes, modified bills of landing, route irregularities, ship-to-ship transfers, and complex ownership structures are just a few of the red flags that can indicate the risks of these threats to business. Identifying these risks while keeping business moving requires nuanced contextual knowledge and judgment. Human-led due diligence is an essential tool for cutting through the noise to distinguish critical risks from baseline media coverage and unsupported allegations.

#### **REGIONAL CASE STUDIES**

#### India

A freight forwarder expressed concerns to PSA about recurring transshipment delays from Mumbai to New York City via Singapore. Citing poor weather and labor shortages, the client feared inaccuracies and document falsification during downtime. Adopting a risk-based approach, PSA scrutinized third-party partners in India, Singapore, and New York through court records, ownership mapping, and human sources. Results revealed compliant operations and justified delays, reassuring the client and emphasizing proactive risk management in international freight forwarding.

#### **Ivory Coast**

A European shipping firm required a local agent in Abidjan and selected 3 potential counterparties. The Client then enlisted PSA for an on-site assessment and due diligence. PSA was quickly able to disregard two options based on a well-documented history of bribery and corruption for one, and a buried indirect ownership by a current customs official for another. The 3rd and final agent was engaged by the Client following the completion of PSA's report. A document that included the results of numerous in-person interviews with current and former clients and employees, as well as confirmation and sensitivity towards ABAC concerns and proven track records of working with some of the biggest international names using the port.

#### **Oman**

As a multinational logistics company sought to expand operations in Oman, suspicions of bribery and corruption emerged with a customs broker. PSA exposed the veracity of these concerns. The investigation confirmed instances of corruption, prompting the company to take swift corrective actions by severing ties with the broker and implementing robust compliance measures. This proactive approach not only protected the company's reputation but also underscored the importance of thorough due diligence in maintaining ethical standards during global expansions.

### **TOPICAL CASE STUDIES**

#### **Trafficking**

When the Paraguayan agent of a US MNC initiated large tobaccorelated orders, designating a different manufacturing company as the consignee, PSA intervened. Over successive weeks our investigation began revealing a network of interconnected companies operating across the Tri-Border Area (Argentina, Brazil, and Paraguay). These entities were actively involved in illicit tobacco production and smuggling. Equipped with this information, our client successfully challenged the orders' validity, mitigating exposure and safeguarding against potential risks.

#### **Sanctions**

Confronting heightened sanctions risks linked to China, a global freight forwarder partnered with PSA to conduct a rapid series of indepth due diligence reviews to seek to quantify and identify potential risks. Armed with this information, the forwarder implemented targeted compliance measures to mitigate ongoing risks related to sanctioned entities, restricted goods, and regulatory concerns. This timely assistance ensured compliance with China-related sanctions and fortified the company's resilience in the dynamic global logistics landscape.

### **Bribery**

Responding to whistleblower allegations of bribery paid by company agents to tax officials in Nigeria, a MNC Marine Transport Organization contacted PSA to investigate. From PSA's Dubai office, we were able to quickly identify discreet human sources familiar with local business practices who were able to corroborate the reality of the claims. From there, PSA investigators expanded their search to quickly pinpoint the specific entities and individuals responsible.

# In 2023, PSA completed reports in 151 jurisdictions on 6 continents.

PSA supports a truly global portfolio of 250+ multinational clients to mitigate risk in every corner of the world.



Countries with completed reports in 2023.



# **Pacific Strategies & Assessments**

Established in 2000, PSA is a specialist risk consultancy delivering critical information to our clients through our Due Diligence, Investigations, and Advisory services. We operate where our clients do business, with regional offices staffed by investigators and responders who have extensive in-region experience gained from professional

backgrounds in corporate investigations, government intelligence and law enforcement. With a disciplined focus on information collection, we have a 23-year track record of supporting businesses in conducting assessments of complex operating environments.



# Uue Diligence

Our DD products are tailored to our clients' needs and based in deep understanding of best practices and regulatory guidelines. We scale from desktop research to on-theground investigations with multiple process-based due diligence options.



# **□**Investigations

PSA has a proven record in supporting companies in complex, international investigations. Our investigative abilities can be scoped to accommodate a variety of engagements, including whistleblower response, fraud investigations, and asset tracing.



## Advisory

PSA provides strategic guidance to firms to address specific concerns. We tailor services to support clients on a variety of complex issues, including complex disputes, country-specific operational risks, emerging regulatory issues, and point-specific human risks.



