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Deskside Sanctions Analysis – Record Validation

User Guide

www.kyc-data.com
EAMINDSET LTD

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Associated Video:

YouTube https://www.youtube.com/watch?v=mfKkuhyvPnU

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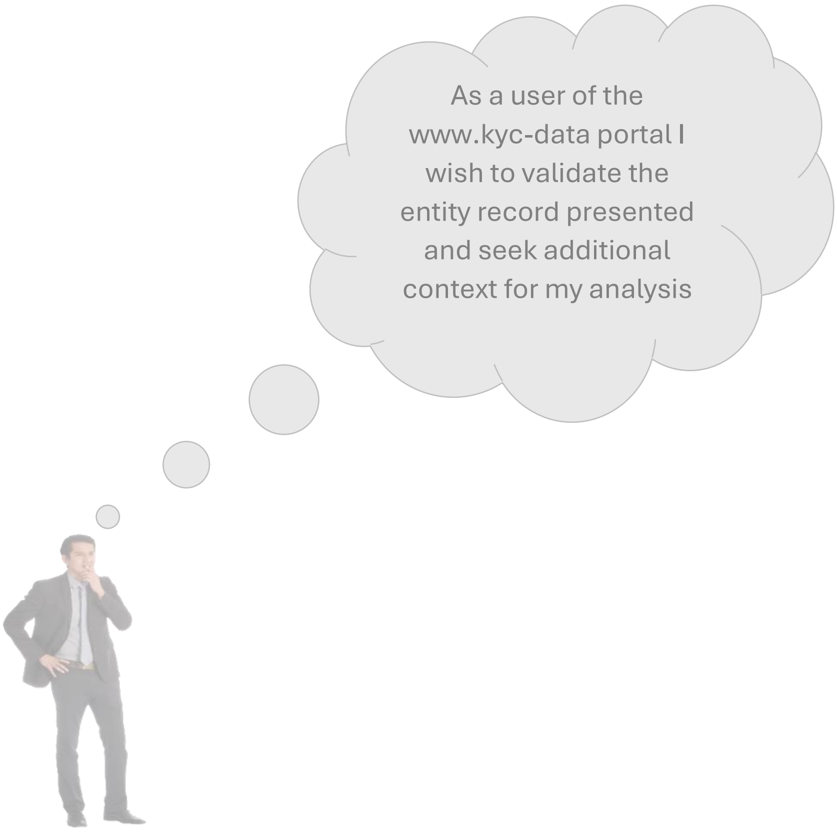


Purpose

This User Guide is intended to assist with the execution of deskside sanctioned entity check touching one or many sanctions lists.

The kyc-data.com portal provides a deskside support tool for sanctions enquiries and is supported by the global regulatory directory (GRD) for further validation of a record.

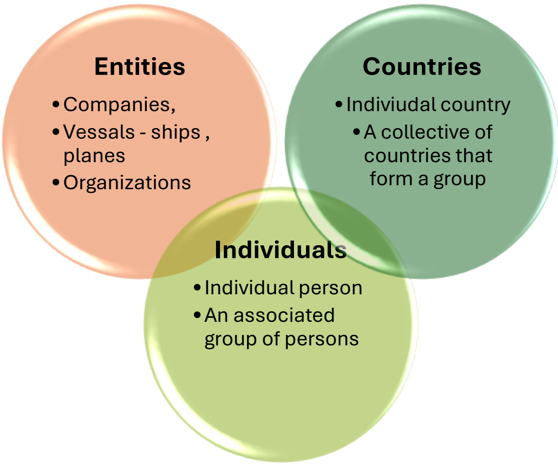
Please note the use of some sanctions list require registration and subscription.

In many cases sanctioned entities, as opposed to individuals, can be found on country company registers and allows one to establish if they are still trading and gather some trading history if accounts have been published.

In this guide we select a sanctioned entity and highlight the simple process to gather additional context related to that entity.

Introduction

Sanctions are the financial and trade-related **restrictive measures** imposed for economic or political reasons by a nation or group of nations with the aim to influence the behaviour or set of behaviours of an individual state, a group or individual/s. Sanctions can be imposed on one or all of the following depicted below.



Several types of sanctions are used to address diverse types of behaviour. The type of sanction used is usually determined by the desired outcome or end goal. Below, are three examples of sanctions, but note there are several more.

- **Economic Sanctions** or **Financial**, and trade penalties aimed at affecting a nation, company, or individual economically**.**
- **Diplomatic Sanctions** are usually policy measures that seek to limit high-level government visits, recalling domestic ambassadors, or expelling foreign ambassadors. In extreme cases, international relationships can be reorganized or broken.
- **Military Sanctions** are trade penalties directly targeting a nation or group's military procurement and financing efforts. Typically, military sanctions are used to curb— or stop—military action. In principle Sanctions are intended to be temporary in nature and often subject to regular reviews. When their objective ae achieved, they are normally removed.

Under the provisions of Chapter VII of the UN Charter, the UN Security Council may decide to impose collective sanctions. When this happens, Member States are obliged under international law to implement these measures and incorporate the provisions in their own legal systems. Hence, as a default, all sanctions search on the kyc-data.com portal include the UN Sanctions list.

Process

At www.kyc-data-com sanctions data is ingested and aggregated on a daily/weekly basis allowing subscribers to browse, search and view records in a user-friendly way.

The data presented on the portal, whilst not ingested from any third party other than the sanctions originator, can be validated if required, by visiting the origination source found in the GRD section of the portal. This can be achieved by following seven simple steps depicted in fig 1 and discussed below.

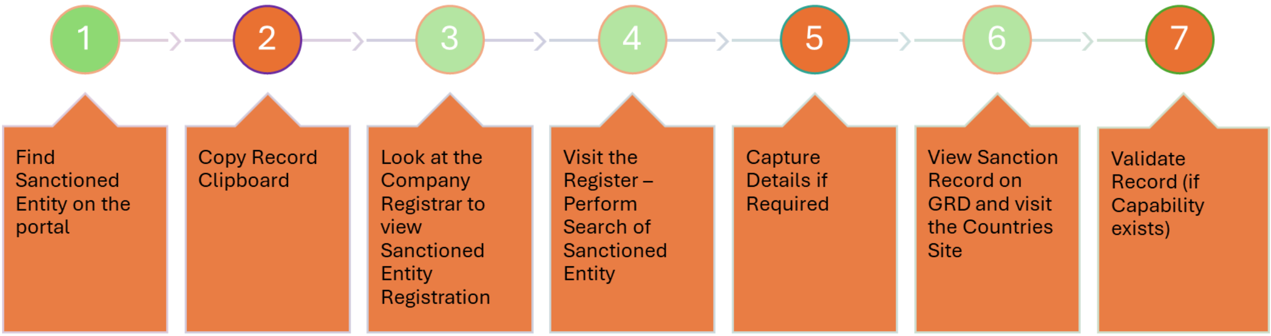


Figure 1 : Seven step process to validating a record on kyc-data.com

1. Find Sanctioned Entity on the Portal

Once you have entered the kyc-data.com portal and read initial disclaimer pop-ups, you are to the directed to the home screen, here you will find the menu options on the top right-hand side of the browser window.

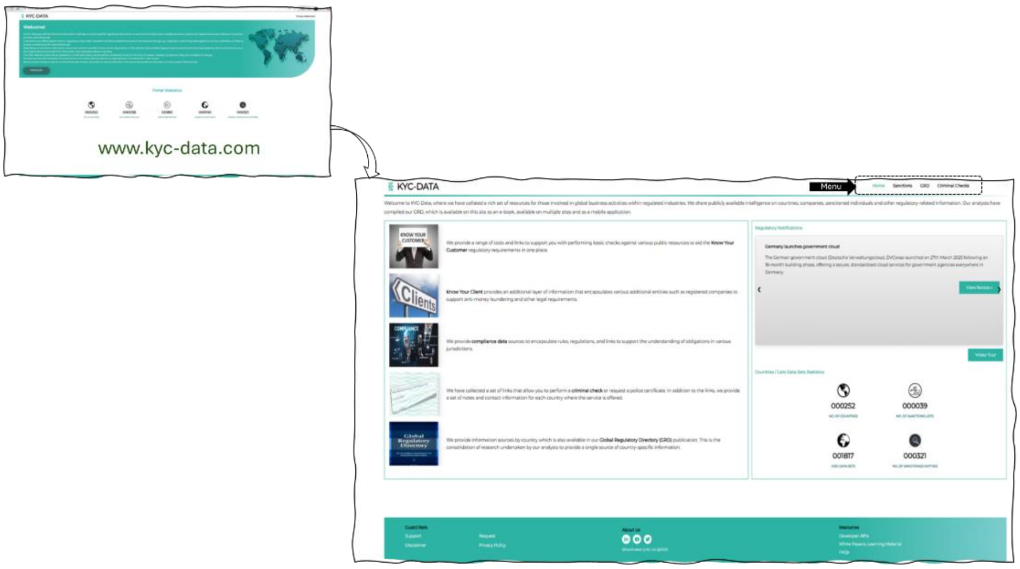


Figure 2: home screen on the portal.

Selecting the sanctions option (fig 2) moves you to sanctions window, where on the top right hand side of the screen you will see a figure which represents the total number of sanctions and below the indicators highlighting the total number of sanctioned individuals, entities and vessels held in the system.

Figure 3 : Sanctions Window.

If you are a registered subscriber, you can select any of the sanctions list available for your plan, as shown in fig 2 above. If, however, you are a guest user, then some sanctions list will not be visible and shown as light grey text in the list.

If you simply want to view the sanction relating to a specific country i.e. the address related to the sanctioned individual, entity or vessel then select the country on the map.

NB: the number of records displayed on the map will vary dependent on your log in status at the time of request.

When selecting a list or a location on the map then entering BROWSE, a new pop-up will occur showing all records below, selecting entity will show you the companies that are on the sanctions list as depicted in fig 4 below:

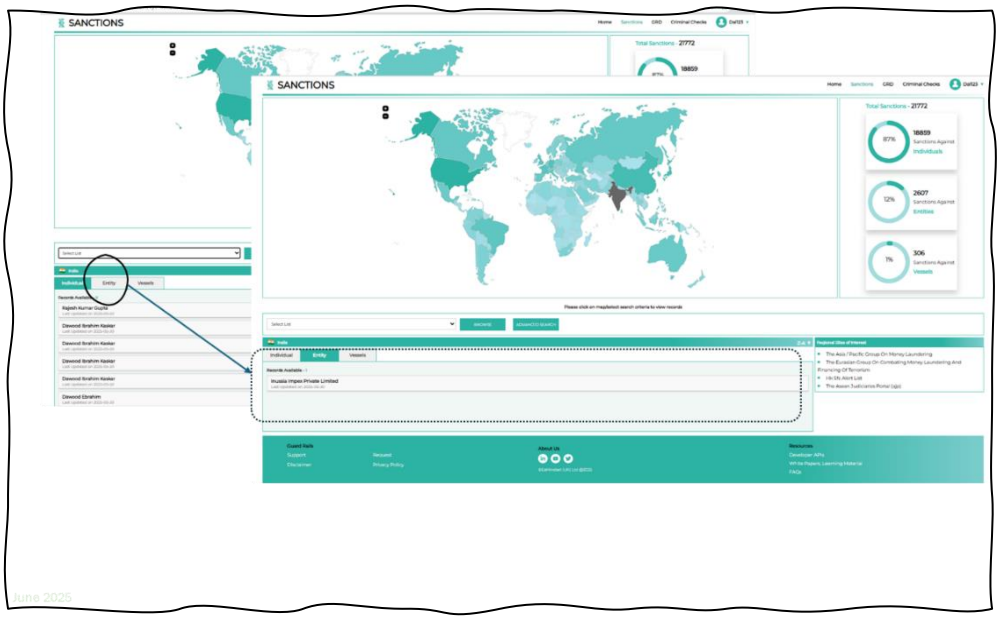


Figure 4 : Entities found on the country specific list.

When you select the record, you wish to validate or explore a record a window will pop with the record details as depicted in fig 5.

2. Copy Record Clipboard

When the record you wish to explore is selected a window will pop-up displaying the details associated with the record.

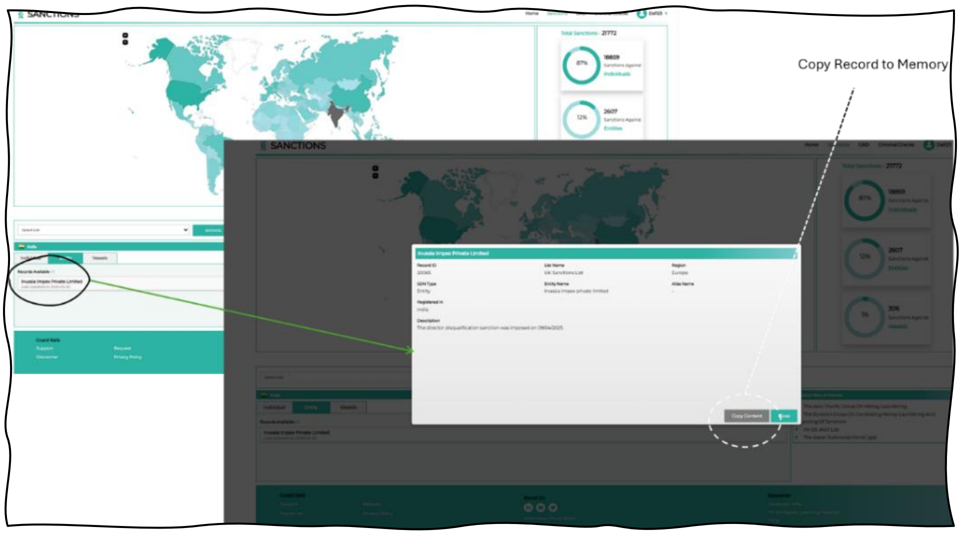


Figure 5 : Record details extracted from the sanctions list.

Individual records vary from entity records, as in most cases, the entity is named with its country of Origin, and the beneficial ownership information of the entity must be examined in the country of origins company register.

Selecting Copy Content will copy the record details into the local systems clipboard, allowing you to edit or paste the record on your local system which can is viewed in the notepad application when pasted as shown in fig 6 below.

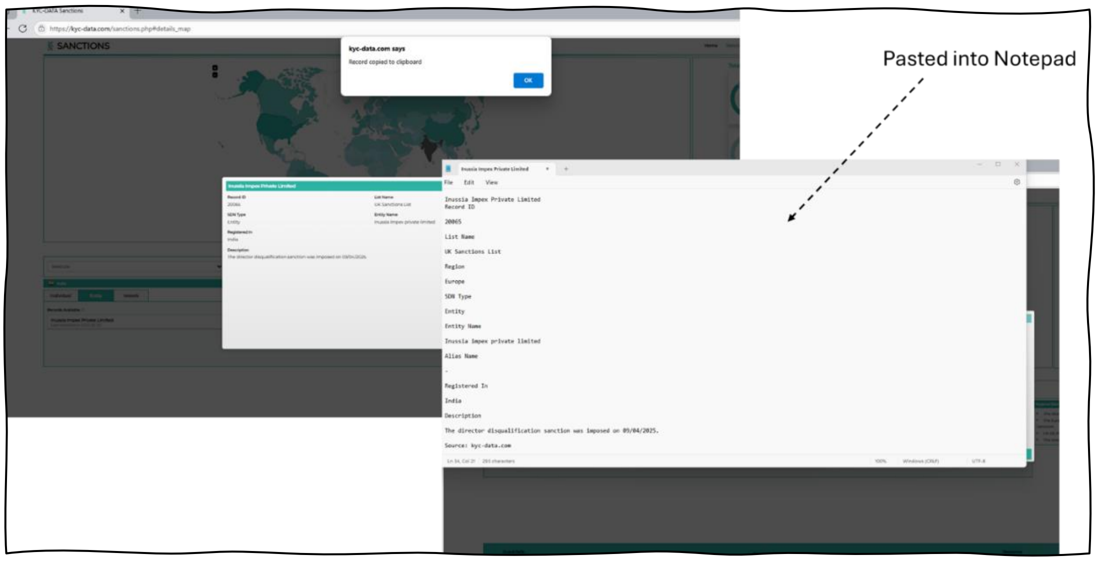


Figure 6 : Record pasted into the local machines notepad.

Here you can view the record and copy the record or sections of it to your local machine – highlighting the name then copying the record will allow you to paste the partial details required into the subsequent browser screens discussed below.

Please note the level of information presented will vary between entities and individuals where passport details and the reason for the sanction is highlighted in the latter.

3. Look at the Company Registrar to view Sanctioned Entity Registration

Once you have found the record you wish to explore you should visit the country of registration company register.

Details of the registrar can be found by visiting the country GRD page as show in fig 7 below.

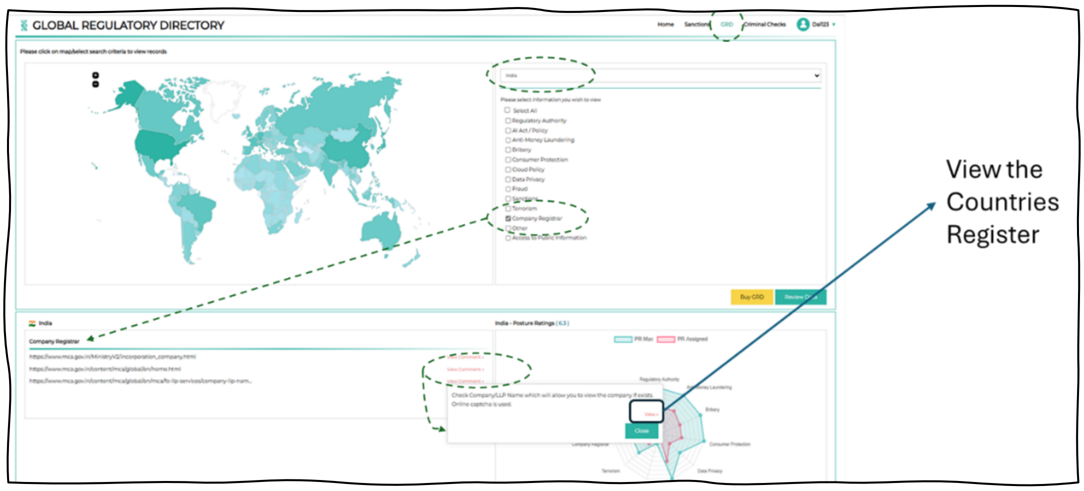


Figure 7 : GRD Page where selecting 'Company Registrar' highlights registrar related information.

Selecting the Country and highlighting the registrar will present the various URLS and notes for the country . Selecting the relevant link and choosing View » will open a new browser window to the URL of the company registrar.

4. Visit the Register – Perform Search of Sanctioned Entity

The new browser window will land on the country registrar as shown in fig 8 below, where in most cases, a company search can be performed. Pasting the entity name from the notepad into the search / look up bar will allow you to find the relevant record if it exists.

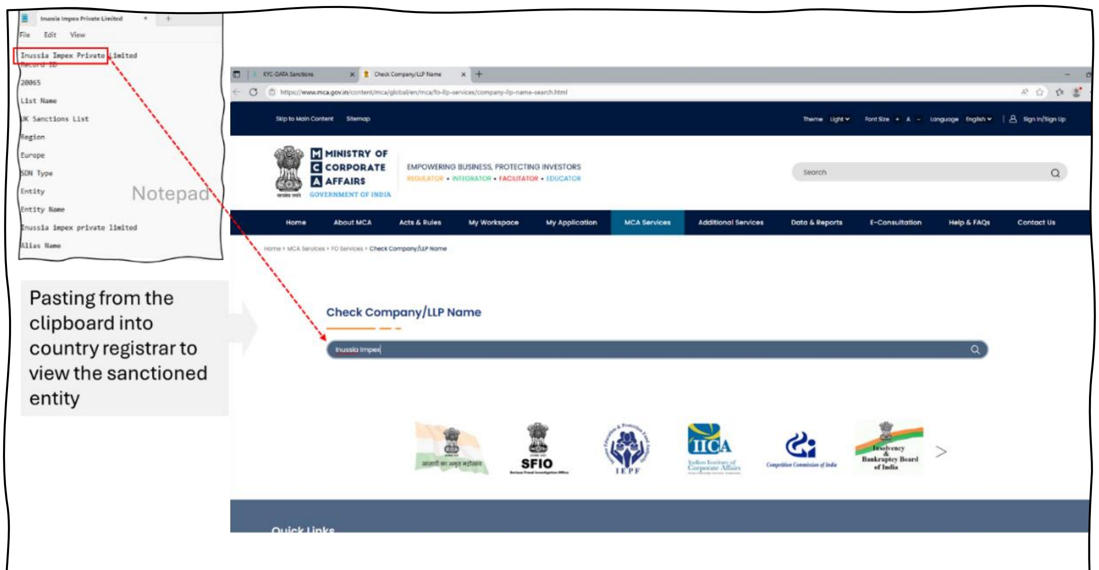


Figure 8 : New window for the Registrar of the Country

5. Capture Details if Required

The search / look up function will return the result and display the record/s as shown in the example in fig 9. And highlights the fact that the sanctioned entity is still trading despite being on a foreign countries sanction list.

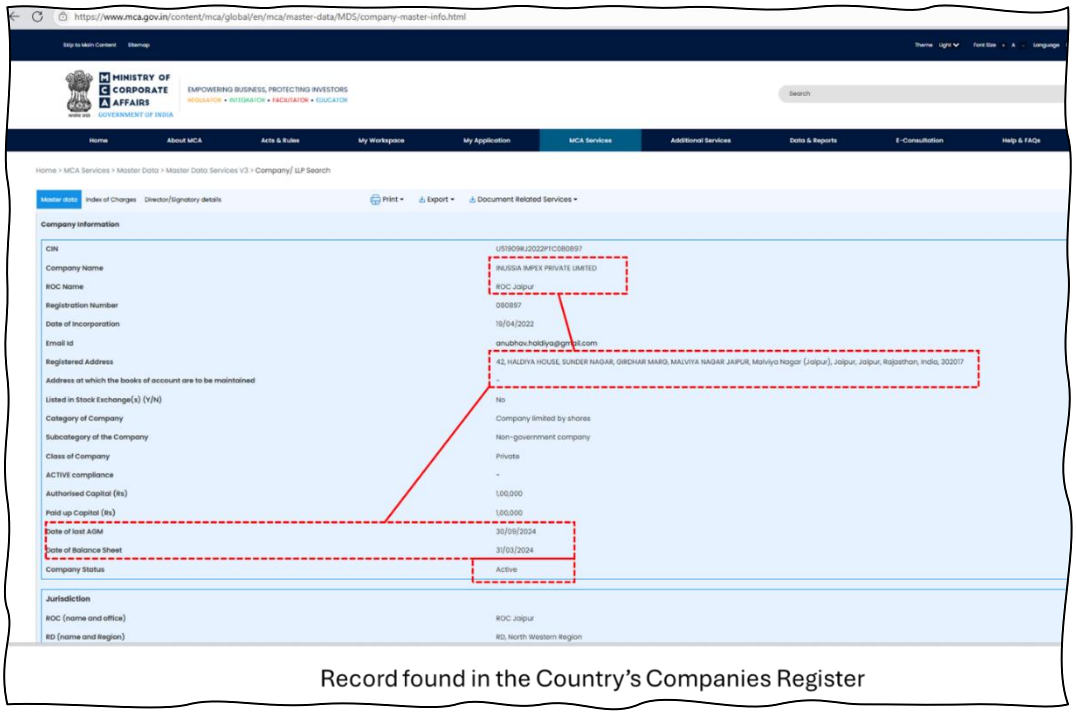


Figure 9 : Returned Result - The Record as per the Country Register

6. View Sanction Record on GRD and visit the Countries Site

Once the record has been viewed in the sanctioned entities country register it would be prudent to cross validate the record by viewing the original sanctions source.

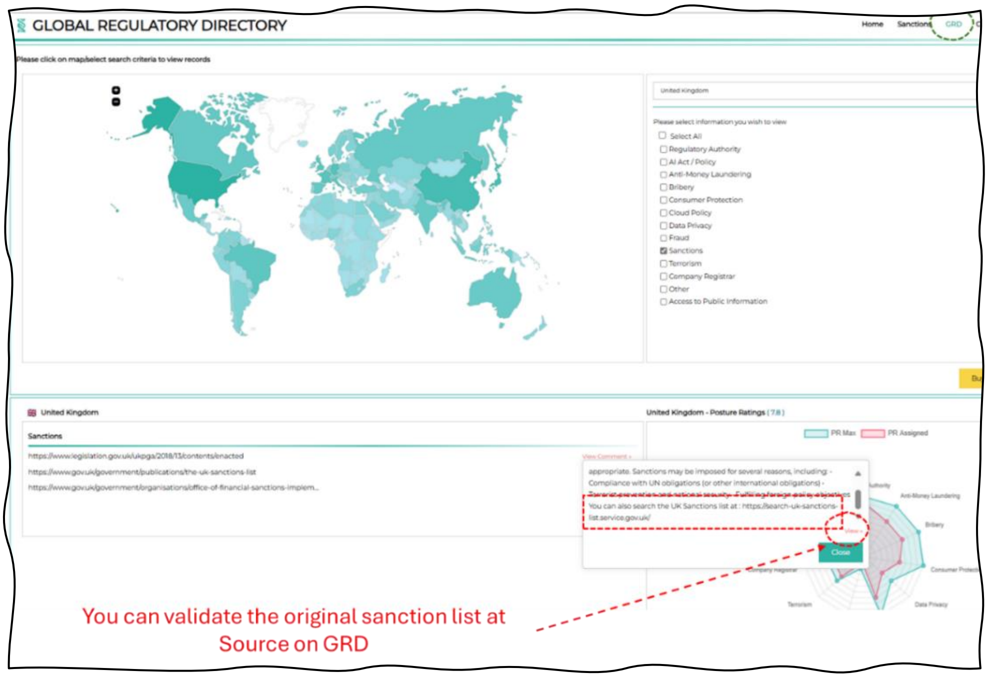


Figure 10 : Using the GRD to find the original Sanctions List

7. Validate Record (if Capability Exists).

Visiting the originator of the sanctions, in this example the United Kingdom, we can explore the original sanctions list.

We have found some countries who publish sanctions list simply publish the name and limited information, however in our example the UK Sanctions list has sufficient detail to extrapolate sufficient context.

When pasting the sanctioned entities name into the Search bar the details will appear as shown in fig 11.

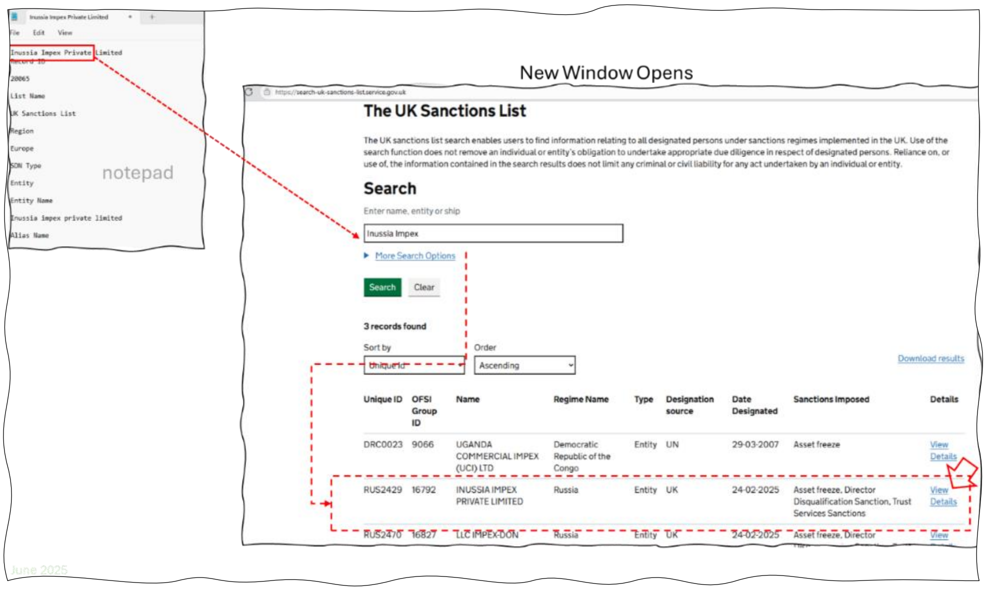


Figure 11 : Record found on the original Sanction list and still valid.

Further analysis highlights we have the correct details and that the record presented on the kyc-data.com portal is a true representation of the record on the sanctions list.

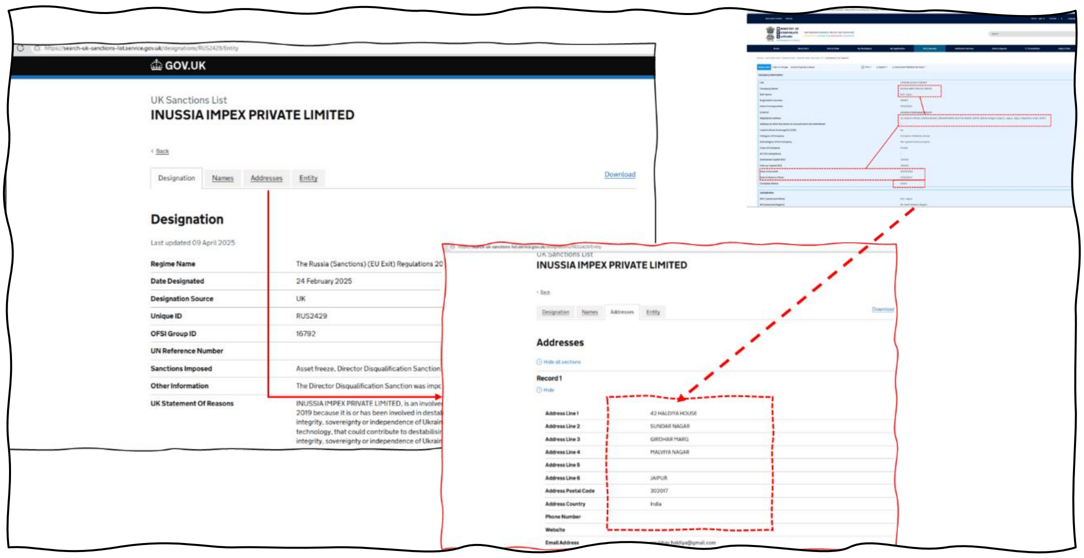


Figure 12 : Records Match

Conclusion

In this short paper we highlighted some simple steps to validate a sanction record on the www.kyc-data.com portal and how to gather additional context associated with the record.

Using both the Sanctions and GRD menu options provide you with the capability to view and validate by:

1. Using the Sanctions option to view a sanctioned individual, entity, or vessel
2. Reverting to the original published sanctions list to validate whether the record exists by obtaining the information from the GRD section.

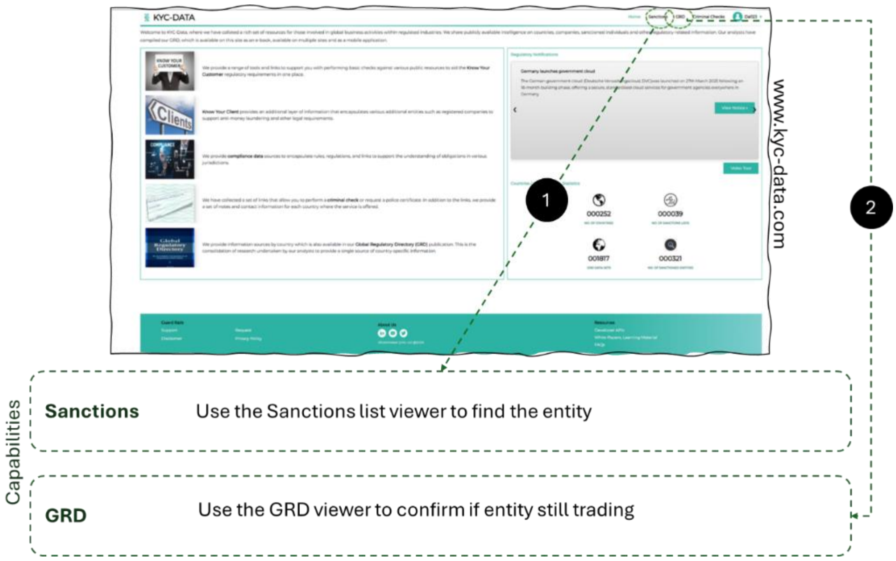


Figure 13 : Summary.