

October 2019

RISK & COMPLIANCE BRIEFING

Anti-Money Laundering, Sanctions Compliance, Due Diligence

DOW JONES RISK & COMPLIANCE

- Over 19 years supplying Risk & Compliance data to Financial Institutions, Corporate and Governments.
- High growth business leveraging Dow Jones strengths
 - Access to open source information and research tools
 - Global footprint and infrastructure
 - Editorial standards and research methodologies
- Strategic area for Dow Jones and NewsCorp

GLOBAL RESEARCH EXPERTISE

- Five dedicated Dow Jones research and monitoring centers (Princeton, London, Barcelona, Singapore, Shanghai).
- Multilingual research team (over 70 languages), covering 30 risk categories
- Team combines human intelligence with sophisticated data discovery, entity extraction, machine learning
- Exclusive access to our proprietary risk and news









Research that goes beyond the internet



Quality:

- → Stringent processes are in place to ensure the highest possible quality of our sanctions data
- → Sanction data and quality processes reviewed by "Big 4" and accredited to international standards
 - First list provider to pass ISAE 3000 review
 - First list provider to pass accuracy and completeness testing

Key differentiators:

- One unique profile consolidates all details for each entity or individual.
- ✓ Profiles enriched with a higher level of 2nd level identifiers key for clearing false positives faster.
- Better structured and and more flexibility to make screening more efficient.
- No broken links, no paywalls. Our news links go to our own news database.



Risk data categories



Sanctions Ownership Research

Companies owned or controlled by people or entities sanctioned by the U.S. Office of Foreign Assets Control (OFAC) or the European Union:

- Minimum ownership stake of 10%
- A sanctioned individual has a possible controlling interest

Individual Ownership

Aggregated
Ownership:
SSI
sanctioned
subjects if part
of same
Directive

Aggregated
Ownership:
Multiple
sanctioned
subjects own
50% or more

Second level subsidiaries: Subsidiary of subsidiary of sanctioned subject

















Sanctions Ownership Research

Companies owned or controlled by people or entities sanctioned by the U.S. Office of Foreign Assets Control (OFAC) or the European Union:

- Minimum ownership stake of 10%
- A sanctioned individual has a possible controlling interest
- Companies owned/controlled by comprehensively sanctioned regions (Iran, North Korea, Syria, Cuba, Crimea)

Individual Ownership

Aggregated
Ownership:
SSI
sanctioned
subjects if part
of same
Directive

Aggregated
Ownership:
Multiple
sanctioned
subjects own
50% or more

Second level subsidiaries: Subsidiary of subsidiary of sanctioned subject







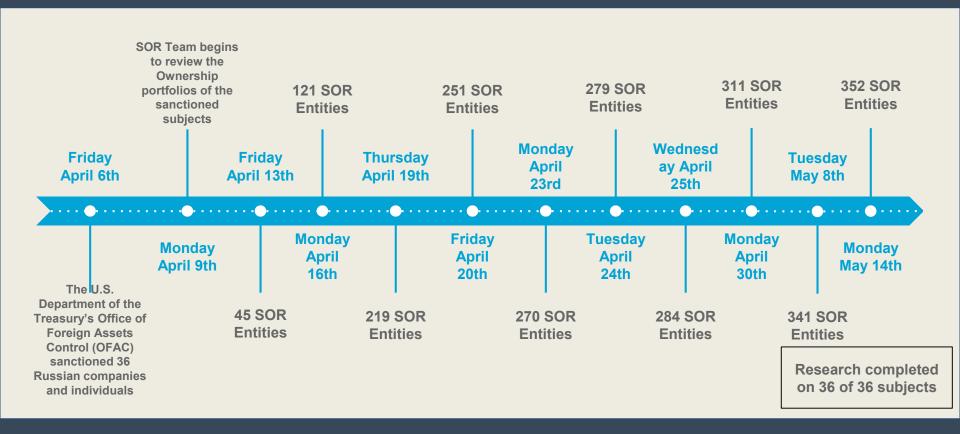




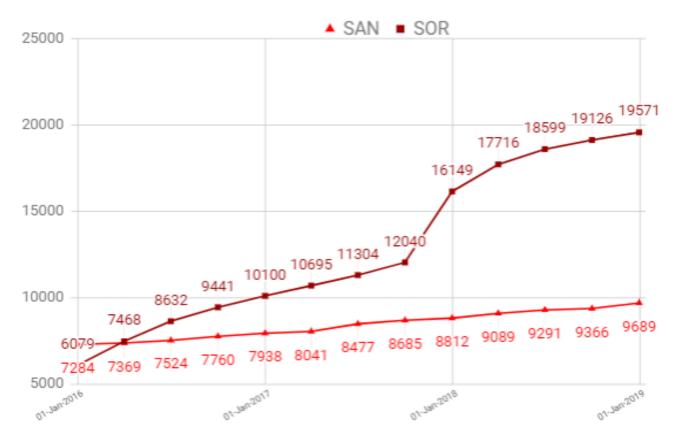
20,000+ entities in 172 countries



April 6th Russian OFAC Sanctions - SOR In Real-Time



SOR Entities Behind OFAC/EU Sanctioned Subjects



Close to 1,000 of these entities have been added last 6 months

So far 450+ SOR were later sanctioned with an average time of 650 days

SOR Categories

Direct Targets

- **OFAC Related Majority Owned (OFAC subject owns 50%-100%)**
- **OFAC Related Minority Owned (OFAC subject owns 10%-49.99%)**
- OFAC Related Ownership Unknown (OFAC subject owns an unknown stake or holds a position of control)
- Formerly OFAC Related (no longer owned by OFAC subject/sanctions removed/ceased to exist)
- **EU Related Majority Owned** (EU subject owns 50%-100%)
- **EU Related Minority Owned** (EU subject owns 10%-49.99%)
- **EU Related Ownership Unknown** (EU subject owns an unknown stake or holds a position of control)
- Formerly EU Related (no longer owned by EU subject/sanctions removed/ceased to exist)

Research Methodology

- Daily monitoring of additions and modifications to the OFAC and EU Sanctions Lists.
- Research conducted in local languages by native speakers, e.g. Russian, Ukrainian, Farsi, Arabic, Korean, Spanish and more.
- Business registers, official gazettes, government web pages, corporate reports, corporate websites and reputable media publications.
- Ongoing regular review.
- Even subjects who have no holdings must be researched to prove the lack of ownership.



کی سفعه اسلی ا فواتین و مقررات تکهی های فاتونی کردات الگارونیش ا مشغرات

👊 البنواک نسخه کاغذی 🐠 بخشنامه های رئیس قوه قضائیه 🎎 مشروح مذاکرات مجلس

انتشارات

ورود اعضا

روزنامه رسمی جمهوری اسلامی ایران



STAY COME PROGRAM	ويژه همكاران	واهتما	حرياره ها	رتياط با ما	
			جزنیات آگھی		
			شماره روزنامه ۱۳۹۱ تهزان شماره صفحه روزنامه ۱۴ تاریخ روزنامه ۱۳۹۷/۵/۲۹ شماره نامه اداره دید. ۹۰۵/۵۲۹۸۷		
			PAY/O/PF		
به تیماره های ۱۳۳۹/۳۳۱ به نمایسگی از شرکت ۱۳۲۲ به نمایسگی از شرکت پیشفارات بخوان ویست بر از شرکت توسیح تجران محارف سیارها برناملی و ضو فیلت محربه استان شدند کلیه اوراق لمراه با مهر شرکت و مبارق باشار از پنج میلیارد ریال با اگ فیلت مدرس فغراه با مهر شرکت مصر می	. آقای سیدهای قروزآبادی به شماره هنی ۱۳۶۳/۱۵ به ساید. (۱۳۶۰-۱۳۰۲ به ساید.) و پرویکنش به شماره داد است ۱۳۶۲/۱۳ به ساید. به ساید این به شماره های ۱۳۶۴/۱۳ به ساید. عدر نا ساقف بهج میتباد ریاف با افضاه مشدری دو بخو از از اصله مشدری دو نظر از اصله مشدری دو نظر از اصله مشدری دو نظر از اصد از از ۱۳۰۰ از ۱۳۰ به صد	۱۹۷۰ - ۱۷۰ - سمیه ۱۹۷۰ - ۱۹۳۱ - ۱۳۳۱ - ۱۹۳۱ - ۱۹۳۱ - ۱۹۳۱ - ۱۹۳۱ - ۱۹۳۱ - ۱۹۳۱ - ۱۳۳	پخسته هیلت مدیره مورد و گذری در ساخل ایراد ۱ به عیوان عمو هیلت د ۱ به میوان عمو هیلت د ایر میوان عمو هیلت در ایر مالی از جمله چکه سد آن و یک عمو هیلت مدیره آن و یک عمو هیلت مدیره	به استناد صور اسکانا این ۱-۲۹۸۷۵۵۶۰۰ ۱-۲۹۹۱۶۹۰۰ و استاد صور الاصاء عدیرخان باشد. اختیاران	
الاستما شده اکهی دانتود کردد،	ت ابرازهای جانبی تازم دانتود و نصب و سیس فایل DF		س به نسخه درجینال فایا ت بیشتر به راهنما مراجعه		
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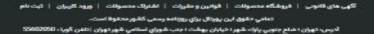
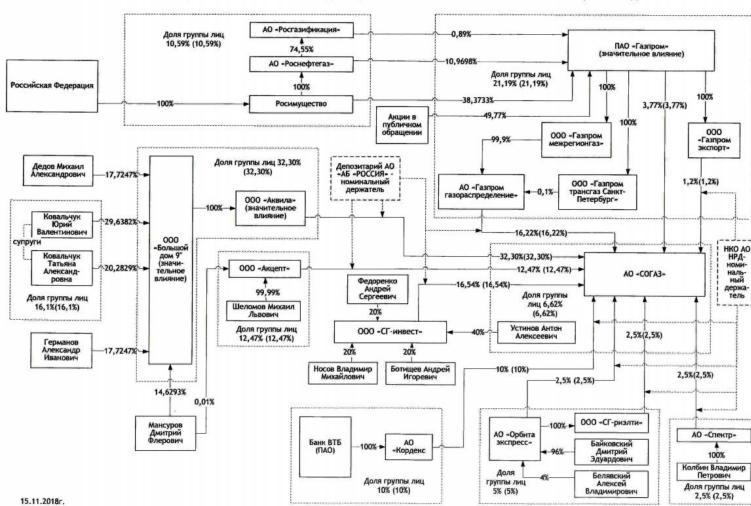
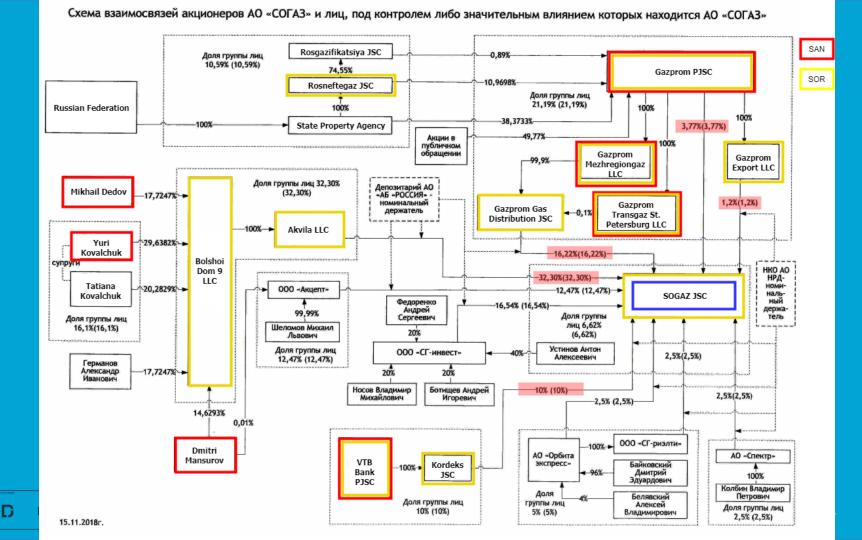


Схема взаимосвязей акционеров АО «СОГАЗ» и лиц, под контролем либо значительным влиянием которых находится АО «СОГАЗ»





Date of Search: 06-Oct-2019 15:06:56 (06-Oct-2019 14:06:58 GMT)

Profile ID Number:

11011758

Record Type:

Entity

Names

Primary Name

Name

Ashtead Technology

Language

Arabic

Suffix

Limited

Original Script Name

أشتيد للتكنولوجيا

Country Details

Country of Registration

United Kingdom

Addresses

Address

Ashtead House Discovery Drive, Arnhall Business Park, Westhill

City Aberdeen State

Scotland

Zip Code AB32 6FG Country United Kingdom URL

http://www.ashtead-technology.com

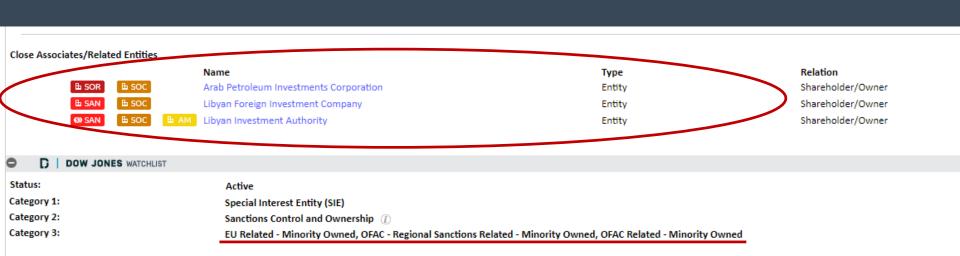
Dates

Type

Date of Registration

12-Feb-1985





DOW JONES

Close Associates/Related Entities

B SOR

B soc

Name
Arab Petroleum Investments Corporation

Libyan Foreign Investment Company Libyan Investment Authority Type Entity Entity

Entity

Relation

Shareholder/Owner Shareholder/Owner

Source Language: English

Translate

(Beta)

Shareholder/Owner



Profile Notes

DOW JONES NOTES: PROFILE CREATED: 05-Jul-2017 UPDATE ADDED: 18-Nov-2017 UPDATE ADDED: 10-Jul-2018

05-Jul-2017

As of 2016, This company is reportedly owned by Arab Petroleum Investments Corporation, which is 15% owned by OFAC E013566 sanctioned Libyan Foreign Investment Company, a fully owned subsidiary of OFAC E013566 and EU sanctioned Libyan Investment Authority.

PROFILE UPDATED: 18-Nov-2017

As of 2016, this company is owned by Arab Petroleum Investments Corporation, which is 15% owned by OFAC E013566 sanctioned Libyan Foreign Investment Company, a fully owned subsidiary of OFAC E013566 and EU sanctioned Libyan Investment Authority. In addition, the OFAC comprehensively sanctioned Government of Syria holds undisclosed shareholding in this company via Arab Petroleum Investments Corporation.

PROFUE UP DATED: 10-Jul-2018

This company is 35% owned by Arab Petroleum Investments Corporation, which is 15% owned by OFAC EO13566 sanctioned Libyan Foreign Investment Company, a fully owned subsidiary of OFAC EO13566 and EU sanctioned Libyan Investment Authority. In addition, the OFAC comprehensively sanctioned Government of Syria holds 1.05% in this company via Arab Petroleum Investments Corporation.

Sources

http://akhbar-alkhaleej.com/news/article/1016012

http://www.albayan.ae/economy/capital-markets/2016-04-20-1.2621750

http://www.apicorp-arabia.com/apicorp-acquires-stake-in-oil-services-company-ashtead-technology

http://www.apicorp-arabia.com/files/AR-2016/APICORP_Annual_Report_2016_English.pdf

http://www.apicorp-arabia.com/Financials/Moody_Credit_Analysis_2017.pdf

http://www.dfsa.ae/CMSPages/GetFile.aspx?guid=e7e9edd8-0e42-4212-bd09-97fe0926f871

https://opencorporates.com/companies/gb/SC091624

https://s3-eu-west-1.amazonaws.com/document-api-images-prod/docs/cXmv57BLt5zOf581EhavAPWxRn-SsvMLRxx1b2jKECM/application-pdf?

https://www.ca-cib.com/sites/default/files/2019-03/Prospectus_Arab%20Petroleum%20Investments%20Corporation%20U.S.%24300%2C000%2C000%20Floating%20Rate%20Notes%20due%202024.pdf



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