



Compliance checks



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1 Politically Exposed Persons (PEPs)

1.1 PEP definition

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

- Current or former senior officials 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 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 consider, to comply with relevant regulations, it is not sufficiently elaborate for clients to conveniently refer to the PEP verification process in a comprehensive approach.

To address this issue, a PEP Tiering guidelines has been set up that serves as the research framework for analysts to follow consistently throughout systematic research and adhoc 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 approach , the categories are divided into different risk levels, which also form a systematic data development and maintenance procedure.

- A 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.

1 Politically Exposed Persons (PEPs)

1.2 PEPs classification

PEP Tier 1

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.

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).

PEP Tier 2

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.

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);

Presidents/Chairperson and board members of State Owned Enterprises (SOEs), businesses and organisations.

Senior officials of the military, judiciary, law enforcement agencies, central banks and 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).

Heads and senior members of mainstream religious groups (e.g. archbishop, patriarch, cardinal, bishop, imam, rabbi).

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.

1 Politically Exposed Persons (PEPs)

PEP Tier 3

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).

Alternate/deputy members of parliament/senate (not currently occupying seat).

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 civil servants at regional/provincial or equivalent levels; senior officials of administrative bodies at local levels (directors/secretaries of city governments).

PEPs by association

Family members and personal and business associates of PEPs, typically individuals who are not PEPs in their own capacity but serve on a board of directors alongside PEPs. Based on FATF, Close Associates are considered to be: (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).

1.3 PEPs in State-Owned Enterprises (SOEs)

High Risk – Tier 1 SoEs

Businesses which are 51%-100% state owned.

Medium to High Risk – Tier 2 SoEs

</=50% state owned and where government is represented on the company's board.

Low Risk – Tier 4 SoEs

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.

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.

(Where the government has an 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 Politically Exposed Persons (PEPs)

1.4 PEP Data Resources

Our sources include official government websites or national assemblies of 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. For example, those independent from the state control

Regular Updates:

- Selected media websites for regular (daily) media checks

2 Sanctions & Freeze

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

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

- **Consolidated list of financial sanctions targets (Asset Freeze Target List)**

- **Current Regimes**

- Afghanistan
- Belarus
- Burundi
- Central African Republic
- Democratic Republic of Congo
- Egypt
- Iran (Human Rights)
- Iran (Nuclear Proliferation)
- ISIL (Da'esh) and Al-Qaida
- Iraq
- 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 (Anti-Terrorism, Crime and Security Act 2001).
- 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
- Global Magnitsky 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)



2 Sanctions & Freeze

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 / 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)**



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2 Sanctions & Freeze

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
 - Democratic People's Republic of Korea (North Korea)
 - Lebanon
 - Libya
 - Mali
 - Moldova
 - Myanmar (Burma)
 - Russian Federation
 - Serbia and Montenegro
 - Somalia
 - South Sudan
 - China
 - Democratic Republic of Congo
 - Egypt
 - Eritrea
 - Republic of Guinea (Conakry)
 - Guinea-Bissau
 - Haiti
 - Iran
 - Iraq
 - 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 Sanctions & Freeze

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 our 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, we also monitor other national or unilateral sanctions which are only enforced locally rather than globally. Individuals and entities featuring local sanction list. This approach enables our 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 our coverage and not intended to provide a full disclosure of all sources regularly monitored:

- 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



2 Sanctions & Freeze

- 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



3 Adverse Media Categories - Designated categories of offences

Financial Action Task Force (FATF)

- participation in an organised criminal group and racketeering;
- terrorism, including terrorist financing;
- trafficking in human beings and migrant smuggling;
- sexual exploitation, including sexual exploitation of children;
- illicit trafficking in narcotic drugs and psychotropic substances;
- illicit arms trafficking;
- illicit trafficking in stolen and other goods;
- corruption and bribery;
- fraud;
- counterfeiting currency;
- counterfeiting and piracy of products;
- environmental crime;
- murder, grievous bodily injury;
- kidnapping, illegal restraint and hostagetaking;
- robbery or theft;
- smuggling; (including in relation to customs and excise duties and taxes);
- tax crimes (related to direct taxes and indirect taxes);
- extortion;
- forgery;
- piracy; and
- insider trading and market manipulation

When deciding on the range of offences to be covered as predicate offences under each of the categories listed above, each country may decide, in accordance with its domestic law, how it will define those offences and the nature of any particular elements of those offences that make them serious offences.

Designated nonfinancial businesses and professions

Designated nonfinancial businesses and professions means:

- A) Casinos
- B) Real estate agents.
- C) Dealers in precious metals.
- D) Dealers in precious stones.
- E) Lawyers, notaries, other independent legal professionals and accountants – this refers to sole practitioners, partners or employed professionals within professional firms. It is not meant to refer to 'internal' professionals that are employees of other types of businesses, nor to professionals working for government agencies, who may already be subject to AML/CFT measures.
- F) Trust and Company Service Providers refers to all persons or businesses that are not covered elsewhere under these Recommendations, and which as a business, provide any of the following services to third parties:
 - acting as a formation agent of legal persons;
 - acting as (or arranging for another person to act as) a director or secretary of a company, a partner of a partnership, or a similar position in relation to other legal persons;
 - providing a registered office; business address or accommodation, correspondence or administrative address for a company, a partnership or any other legal person or arrangement;
 - acting as (or arranging for another person to act as) a trustee of an express trust or performing the equivalent function for another form of legal arrangement;
 - acting as (or arranging for another person to act as) a nominee shareholder for another person.

References to Casinos throughout the FATF Standards include internet and shipbased casinos.

3 Adverse Media Categories - Designated categories of offences

Designated person or entity

The term designated person or entity refers to:

- i) Individual, groups, undertakings and entities designated by the Committee of the Security Council established pursuant to resolution 1267 (1999) (the 1267 Committee), as being individuals associated with AlQaida, or entities and other groups and undertakings associated with AlQaida;
- ii) Individuals, groups, undertakings and entities designated by the Committee of the Security Council established pursuant to resolution 1988 (2011) (the 1988 Committee), as being associated with the Taliban in constituting a threat to the peace, stability and security of Afghanistan, or entities and other groups and undertakings associated with the Taliban;
- iii) any natural or legal person or entity designated by jurisdictions or a supranational jurisdiction pursuant to Security Council resolution 1373 (2001);
- iv) any natural or legal person or entity designated for the application of targeted financial sanctions pursuant to Security Council resolution 1718 (2006) and its successor resolutions by the Security Council in annexes to the relevant resolutions, or by the Security Council Committee established pursuant to resolution 1718 (2006) (the 1718 Sanctions Committee) pursuant to Security Council resolution 1718 (2006); and
- v) any natural or legal person or entity designated for the application of targeted financial sanctions pursuant to Security Council resolution 1737 (2006) and its successor resolutions by the Security Council in annexes to the relevant resolutions, or by the Security Council Committee established pursuant to paragraph 18 of resolution 1737 (2006) (the 1737 Sanctions Committee) pursuant to resolution 1737 (2006) and its successor resolutions.

Designation

The term designation refers to the identification of a person or entity that is subject to targeted financial sanctions pursuant to:

- United Nations Security Council resolution 1267 (1999) and its successor resolutions;
- Security Council resolution 1373 (2001), including the determination that the relevant sanctions will be applied to the person or entity and the public communication of that determination;
- Security Council resolution 1718 (2006) and its successor resolutions;
- Security Council resolution 1737 (2006) and its successor resolutions; and
- Any future Security Council resolutions which impose targeted financial sanctions in the context of the financing of proliferation of weapons of mass destruction.

[1] Natural or legal.

Domestic Wire Transfer

refers to any wire transfer where the ordering financial institution and beneficiary financial institution are located in the same country. This term therefore refers to any chain of wire transfer that takes place entirely within the borders of a single country, even though the system used to transfer the payment message may be located in another country. The term also refers to any chain of wire transfer that takes place entirely within the borders of the European Economic Area (EEA) (as this term is used in the Interpretive Note to Recommendation 16).

[1] An entity may petition the FATF to be designated as a supranational jurisdiction for the purposes of and limited to an assessment of Recommendation 16 compliance.

3 Adverse Media Categories - Designated categories of offences

Enforceable means

The term "Enforceable means" refers to regulations, guidelines, instructions or other documents or mechanisms that set out enforceable AML/CFT requirements in mandatory language with sanctions for noncompliance, and which are issued or approved by a competent authority. The sanctions for noncompliance should be effective, proportionate and dissuasive (see Recommendation 35) (as this term is used in the Note on the legal basis of requirements on financial institutions and DNFBPs).

Ex Parte

The term ex parte means proceeding without prior notification and participation of the affected party.

Express trust

Express trust refers to a trust clearly created by the settlor, usually in the form of a document e.g. a written deed of trust. They are to be contrasted with trusts which come into being through the operation of the law and which do not result from the clear intent or decision of a settlor to create a trust or similar legal arrangements (e.g. constructive trust).

Ex Parte

Express trust refers to a trust clearly created by the settlor, usually in the form of a document e.g. a written deed of trust. They are to be contrasted with trusts which come into being through the operation of the law and which do not result from the clear intent or decision of a settlor to create a trust or similar legal arrangements (e.g. constructive trust).

False declaration

Refers to a misrepresentation of the value of currency or BNIs being transported, or a misrepresentation of other relevant data which is required for submission in the declaration or otherwise requested by the authorities. This includes failing to make a declaration as required (as this term is used in the Interpretive Note to Recommendation 32).

False disclosure

Refers to a misrepresentation of the value of currency or BNIs being transported, or a misrepresentation of other relevant data which is asked for upon request in the disclosure or otherwise requested by the authorities. This includes failing to make a disclosure as required (as this term is used in the Interpretive Note to Recommendation 32).

Financial Group

Financial group means a group that consists of a parent company or of any other type of legal person exercising control and coordinating functions over the rest of the group for the application of group supervision under the Core Principles, together with branches and/or subsidiaries that are subject to AML/CFT policies and procedures at the group level.

3 Adverse Media Categories - Designated categories of offences

Financial Institutions

Financial institutions means any natural or legal person who conducts as a business one or more of the following activities or operations for or on behalf of a customer:

- 1) Acceptance of deposits and other repayable funds from the public.
- 2) Lending.
- 3) Financial leasing.
- 4) Money or value transfer services.
- 5) Issuing and managing means of payment (e.g. credit and debit cards, cheques, traveller's cheques, money orders and bankers' drafts, electronic money).
- 6) Financial guarantees and commitments.
- 7) Trading in:
 - A) money market instruments (cheques, bills, certificates of deposit, derivatives etc.);
 - B) foreign exchange;
 - C) exchange, interest rate and index instruments;
 - D) transferable securities;
 - E) commodity futures trading.
- 8) Participation in securities issues and the provision of financial services related to such issues.
- 9) Individual and collective portfolio management.
- 10) Safekeeping and administration of cash or liquid securities on behalf of other persons.
- 11) Otherwise investing, administering or managing funds or money on behalf of other persons.
- 12) Underwriting and placement of life insurance and other investment related insurance.
- 13) Money and currency changing.
 - This also captures private banking.
 - This includes inter alia: consumer credit; mortgage credit; factoring, with or without recourse; and finance of commercial transactions (including forfeiting).
 - This does not extend to financial leasing arrangements in relation to consumer products.
 - It does not apply to any natural or legal person that provides financial institutions solely with message or other support systems for transmitting funds. See the Interpretive Note to Recommendation 16.
 - This applies both to insurance undertakings and to insurance intermediaries (agents and brokers).

FIU

Financial Intelligence Unit

Foreign counterparts

Foreign counterparts refers to foreign competent authorities that exercise similar responsibilities and functions in relation to the cooperation which is sought, even where such foreign competent authorities have a different nature or status (e.g. depending on the country, AML/CFT supervision of certain financial sectors may be performed by a supervisor that also has prudential supervisory responsibilities or by a supervisory unit of the FIU).

Freeze

In the context of confiscation and provisional measures (e.g., Recommendations 4, 32 and 38), the term freeze means to prohibit the transfer, conversion, disposition or movement of any property, equipment or other instrumentalities on the basis of, and for the duration of the validity of, an action initiated by a competent authority or a court under a freezing mechanism, or until a forfeiture or confiscation determination is made by a competent authority.

For the purposes of Recommendations 6 and 7 on the implementation of targeted financial sanctions, the term freeze means to prohibit the transfer, conversion, disposition or movement of any funds or other assets that are owned or controlled by designated persons or entities on the basis of, and for the duration of the validity of, an action initiated by the United Nations Security Council or in accordance with applicable Security Council resolutions by a competent authority or a court. In all cases, the frozen property, equipment, instrumentalities, funds or other assets remain the property of the natural or legal person(s) that held an interest in them at the time of the freezing and may continue to be administered by third parties, or through other arrangements established by such natural or legal person(s) prior to the initiation of an action under a freezing mechanism, or in accordance with other national provisions. As part of the implementation of a freeze, countries may decide to take control of the property, equipment, instrumentalities, or funds or other assets as a means to protect against flight.

3 Adverse Media Categories - Designated categories of offences

Fundamental principles of domestic law

This refers to the basic legal principles upon which national legal systems are based and which provide a framework within which national laws are made and powers are exercised. These fundamental principles are normally contained or expressed within a national Constitution or similar document, or through decisions of the highest level of court having the power to make binding interpretations or determinations of national law. Although it will vary from country to country, some examples of such fundamental principles include rights of due process, the presumption of innocence, and a person's right to effective protection by the courts.

Funds

The term funds refers to assets of every kind, whether corporeal or incorporeal, tangible or intangible, movable or immovable, however acquired, and legal documents or instruments in any form, including electronic or digital, evidencing title to, or interest in, such assets.

Funds or other assets

The term funds or other assets means any assets, including, but not limited to, financial assets, economic resources, property of every kind, whether tangible or intangible, movable or immovable, however acquired, and legal documents or instruments in any form, including electronic or digital, evidencing title to, or interest in, such funds or other assets, including, but not limited to, bank credits, travellers cheques, bank cheques, money orders, shares, securities, bonds, drafts, or letters of credit, and any interest, dividends or other income on or value accruing from or generated by such funds or other assets.

Identification data

The term identification data refers to reliable, independent source documents, data or information.

IN

Interpretive Note to the [FATF Recommendations](#).

Intermediary financial institution

Refers to a financial institution in a serial or cover payment chain that receives and transmits a wire transfer on behalf of the ordering financial institution and the beneficiary financial institution, or another intermediary financial institution (as this term is used in the Interpretive Note to Recommendation 16).

International organisations

International organisations are entities established by formal political agreements between their member States that have the status of international treaties; their existence is recognised by law in their member countries; and they are not treated as resident institutional units of the countries in which they are located. Examples of international organisations include the United Nations and affiliated international organisations such as the International Maritime Organisation; regional international organisations such as the Council of Europe, institutions of the European Union, the Organization for Security and Cooperation in Europe and the Organization of American States; military international organisations such as the North Atlantic Treaty Organization, and economic organisations such as the World Trade Organisation or the Association of Southeast Asian Nations, etc.

4 List of Sources Monitored (A-Z)

(Financial and Market Regulators, Ministries, Law Enforcement and Anti-Corruption Units)

Country	Source	Organization
A		
Albania	Albanian Financial Supervisory Authority	
Argentina	Comision Nacional de Valores Policia Federal Argentina	
Australia	Attorney-General's Department Australian Prudential Regulation Authority Australian Securities & Investments Commission (ASIC) Australian Transaction Reports and Analysis Centre (AUSTRAC) Commonwealth of Australian Law Crimenet Crime Stoppers Australian Capital Territory Crime Stoppers Queensland Crime Stoppers South Australia Crime Stoppers Victoria Crime Stoppers Western Australia Department of Foreign Affairs and Trade New South Wales Police Force Reserve Bank of Australia (RBA)	
Austria	Bundeskriminalarnt (Austrian Federal Police) Finanzmarktaufsicht (Financial Market Authority / FMA)	
B		
Bahamas	Central Bank of Bahamas Securities Commission of the Bahamas Royal Bahamas Police Force	
Bahrain	Central Bank of Bahrain	
Bangladesh	Securities and Exchange Commission of Bangladesh	
Belgium	Banking, Finance and Insurance Commission (CBFA) now Financial Services and Markets Authority (FSMA) Belgian Federal Police	
Belize	Central Bank of Belize International Financial Services Commission	
Bermuda	Bermuda Monetary Authority Bermuda Police Service	
Bolivia	Bolsa Boliviana de Valores	
Bosnia and Herzegovina	Securities Commission of the Republic of Srpska Securities Commission of the Federation of Bosnia and Herzegovina	
Brazil	Departamento de Investigacoes Sobre Narcoticos	

4 List of Sources Monitored (A-Z)

(Financial and Market Regulators, Ministries, Law Enforcement and Anti-Corruption Units)

Brazil	Comissão de Valores Mobiliários (CVM /Securities and Exchange Commission)
British Virgin Islands	Financial Services Commission
Bulgaria	Financial Supervision Commission
C	
Canada	Alberta Securities Commission British Columbia – Combined Forces Special Enforcement Unit British Columbia Securities Commission Canadian Securities Administrators Department of Foreign Affairs and International Trade Department of Public Safety Financial Transactions and Reports Analysis Centre of Canada Government of Quebec - Autorité des Marchés Financiers (AMF) Investment Dealers Association Investment Industry Regulatory Nova Scotia Securities Commission Organization of Canada (IROC) Prince Edward Island Securities Office Manitoba Securities Commission Mutual Fund Dealers Association of Canada Office of the Superintendent of Financial Institutions Ontario Securities Commission (OSC) Quebec Most Wanted Royal Canadian Mounted Police Saskatchewan Financial Services Commission Securities Commission of Newfoundland and Labrador The College of Nurses of Ontario
Cayman Islands	Cayman Islands Monetary Authority
Chile	Superintendencia de Valores y Seguros de Chile
China	China Securities Regulatory Commission People's Bank of China
Colombia	Superintendencia Financiera de Colombia Comision Nacional Supervisor de Empresas Y Valores Departamento Administrativo de Seguridad
Costa Rica	Superintendencia General de Valores de Costa Rica (SUGEVAL)
Croatia	Croatian Financial Services Supervisory Agency
Cyprus	Cyprus Securities and Exchange Commission
Czech Republic	Police of Czech Republic



4 List of Sources Monitored (A-Z)

(Financial and Market Regulators, Ministries, Law Enforcement and Anti-Corruption Units)

D

Denmark	Finanstilsynet (Danish Financial Supervisory Authority)
Dominica	Ministry of Finance
Dominican Republic	Superintendencia de Valores

E

Egypt	The Egyptian Exchange
El Salvador	Superintendencia del Sistema Financiero
Estonia	Finantsinspektsioon (Financial Supervision Authority)
Ethiopia	Ethiopia Commodity Exchange (ECE)

F

Finland	Finanssivalvonta (Finish Financial Supervision Authority)
France	Autorite des Marches Financiers (AMF) Avis de recherche de la Police Nationale Banque de France - Commission Bancaire Ministry of Economy, Finance and Industry

G

Germany	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin / Federal Financial Supervisory Authority) Bundeskriminalamt (Federal Criminal Police Office) Polizei Bayern (Bavarian State Police)
Ghana	Securities and Exchange Commission (SEC) Ghana Anti-Corruption Coalition
Gibraltar	Financial Services Commission
Greece	Hellenic Capital Market Commission (HCMC) Hellenic Police
Guatemala	Bolsa de Valores Nacional, S.A.
Guernsey	Financial Services Commission

H

Honduras	Central Bank of Honduras
Hong Kong	Hong Kong Government News Hong Kong Monetary Authority (HKMA) Hong Kong Police Force Hong Kong Special Administrative Region Gazette Hong Kong SFC Investor Education Panel Independent Commission Against Corruption (ICAC) Securities and Futures Commission (SFC) Hungarian Financial Supervisory Authority

I

Iceland	Financial Supervisory Authority
India	Central Bureau of Investigation Central Vigilance Commission

4 List of Sources Monitored (A-Z)

(Financial and Market Regulators, Ministries, Law Enforcement and Anti-Corruption Units)

India	Ministry of Home Affairs Reserve Bank of India Securities and Exchange Board of India (SEBI) Ministry of Corporate Affairs
Indonesia	Indonesian Capital Market Executive Agency (Bapepam)
Ireland	Central Bank of Ireland Chartered Accountants Ireland
Ireland	Companies Registration Office Office of the Director of Corporate Enforcement Irish Tax & Customs – Revenue
Isle of Man	Financial Supervision Commission
Israel	Customs and Excise Bank of Israel Israel Securities Authority Ministry of Defence
Italy	Commissione Nazionale per la Società e la Borsa Ministero Dell'Interno
J	
Jamaica	Financial Services Commission
Japan	Financial Services Agency (FSA) Ministry of Agriculture, Forestry and Fisheries Ministry of Economy, Trade and Industry Ministry of Finance National Police Agency Securities and Exchange Surveillance Commission
Jersey	Financial Services Commission
Jordan	Jordan Securities Commission
K	
Kenya	Capital Markets Authority (CMA) Kenya Revenue Authority (KRA) Kenya Anti Corruption Commission (KACC)
Korea, South	Foreign Trade of Korea Financial Services Commission/Financial Supervisory Service (FSC/FSS) Financial Intelligence Unit
L	
Latvia	Financial and Capital Market Commission
Liberia	Liberia Anti-Corruption Commission (LACC)
Liechtenstein	Financial Market Authority (FMA) Landespolizei Liechtenstein
Lithuania	Insurance Supervisory Commission Securities Commission

4 List of Sources Monitored (A-Z)

(Financial and Market Regulators, Ministries, Law Enforcement and Anti-Corruption Units)

Luxembourg Commission de Surveillance du Secteur Financier (CSSF)

M

Macao (China)

Monetary Authority of Macao

Macedonia

Directorate for Prevention of Money Laundering and Terrorism Financing

Malawi

Malawi Anti-Corruption Commission

Malaysia

Labuan Offshore Financial Services Authority

Malaysian Securities Commission

Royal Malaysian Police

Maldives

Capital Market Development Authority (CMDA)

Malta

Malta Financial Services Authority (MFSA)

Moldova

Centre for Combating Economic Crimes and Corruption

Montenegro

Securities Commission

Mauritius

Financial Services Commission

Mexico

Centro Mexicano Para La Filantropia

Comisión Nacional Bancaria y de Valores (CNBV)

Morocco

Conseil deontologique des valeurs mobilières (CDVM)

N

Namibia

Corruption Watch (Namibia)

Namibia Financial Institutions Supervisory Authority (NAMFISA)

Anti-Corruption Commission

Nepal

Commission for the Investigation of Abuse of Authority

Netherlands

Autoriteit Financiële Markten (AFM)

De Juridische Helpdesk

De Nederlandsche Bank

Insolvency Register

Netherlands Most Wanted

Opgelicht

The Dutch Police

Netherlands Antilles

Bank van de Nederlandse Antillen

New Zealand

Ministry of Foreign Affairs and Trade

Ministry of Consumer Affairs

New Zealand Police

Securities Commission

Serious Fraud Office

Reserve Bank of New Zealand

Nicaragua

Superintendencia de Bancos y de otras Instituciones Financieras de Nicaragua

Nigeria

Securities and Exchange Commission

National Insurance Commission (NIA)

Investments and Securities Tribunal (IST)

Federal Inland Revenue Services (FIRS)



4 List of Sources Monitored (A-Z)

(Financial and Market Regulators, Ministries, Law Enforcement and Anti-Corruption Units)

Norway	Code of Conduct Bureau (CCB - Legal Matters) Independent Corrupt Practices and Other Related Offences Commission (ICPC) Economic and Financial Crimes Commission (EFCC) Nigerian Financial Intelligence Unit (NFIU) Finanstilsynet (Financial Supervisory Authority of Norway)
P	
Pakistan	Federal Investigation Agency National Accountability Bureau Securities and Exchange Commission of Pakistan State Bank of Pakistan
Panama	Comisión Nacional de Valores República de Panamá
Paraguay	Comisión Nacional de Valores
Peru	Comision Nacional Supervisora de Empresas Y Valores Superintendencia del Mercado de Valores
Philippines	Philippines National Police Securities and Exchange Commission
Poland	Polish Financial Supervision Authority
Portugal	Comissão do Mercado de Valores Mobiliários (CMVM / Portuguese Securities Market Commission)
Puerto Rico	Oficina Del Comisionado De Instituciones Financieras (OCIF)
Q	
Qatar	Qatar Financial Centre Regulatory Authority
R	
Romania	Comisia Nationala a Valorilor Mobiliare Directia Nationala Anticoruptie
Russian Federation	Ministry of the Interior The Presidential Office
Rwanda	Rwanda Revenue Authority (RRA) Rwanda Public Procurement Authority (RPPA) National Public Prosecution Authority (NPPA)
S	
Saint Kitts and Nevis	St. Kitts Financial Services Nevis Financial Services
Saudi Arabia	Capital Market Authority (CMA) Ministry of Interior
Serbia	Securities Commission
Sierra Leone	Sierra Leone Anti-Corruption Commssion
Singapore	Commercial Affairs Department Central Narcotics Bureau

4 List of Sources Monitored (A-Z)

(Financial and Market Regulators, Ministries, Law Enforcement and Anti-Corruption Units)

Slovakia	Monetary Authority of Singapore Narodna Banka Slovenska General Police Directorate Securities Market Agency (ATVP)
South Africa	Ministry of the Interior Financial Services Board National Credit Regulator (NCR) Corruption Watch (South Africa) Securities and Exchange Commission (SEC- Sotuh Africa) South African Police Service National Prosecuting Authority (NPA)
Spain	Comision Nacional Del Mercado de Valores (CNMV) Cuerpo Nacional de Policía
Sri Lanka	Securities and Exchange Commission of Sri Lanka
Sweden	Finansinspektionen
Switzerland	State Secretariat for Economic Affairs
Switzerland	Swiss Financial Market Supervisory Authority (FINMA) Swiss Police
Syria	Syrian Commission on Financial Markets and Securities Damascus Securities Exchange
T	
Taiwan	Financial Supervisory Commission Ministry of Justice – Investigation Bureau
Tanzania	Capital Markets Authority Prevention and Combating of Corruption Bureau (PCCB) Capital Market and Securities Authority
Thailand	Securities and Exchange Commission
Tunisia	Conseil du Marché Financier (CMF)
Turkey	Capital Markets Board
U	
Uganda	Capital Markets Authority (CMA - Uganda) The Inspectorate of Government (IGG) Directorate of Public Prosecutions Uganda (DPP) The Public Procurement Disposal of Public Assets Authority (PPDA)
United Arab Emirates	Dubai Financial Services Authority (DFSA)
United Kingdom	Action Fraud Bank of England Charity Commission Cheshire Constabulary Child Exploitation and Online Protection Centre City of London Police

4 List of Sources Monitored (A-Z)

(Financial and Market Regulators, Ministries, Law Enforcement and Anti-Corruption Units)

United Kingdom

Companies House
Crimestoppers
Criminal Cases Review Commission
Crown Prosecution Service
Devon and Cornwall Police
Financial Services Authority (FSA)
General Medical Council
Hampshire Constabulary
Health & Safety Executive
HM Revenue and Customs
HM Treasury
Home Office
Insolvency Service
Insolvency Service (IVA)
Investment Management Regulatory Organisation
Insurance Fraud Investigators Group
Lancashire Constabulary
Law Society Gazette
Lloyd's Insurance Market
Metropolitan Police
National Extremism Tactical Coordination Unit
News Distribution Service
NHS Business Services Authority
Personal Investment Authority
Royal Institution of Chartered Surveyors
Scottish Solicitors' Discipline Tribunal
Securities and Futures Authority
Serious Fraud Office
Serious Organised Crime Agency
Solicitors Regulation Authority
The Institute of Chartered Accountants in England and Wales
The Institute of Chartered Accountants Scotland
Tribunals Service

United States of America

America's Most Wanted
Bureau for International Narcotics and Law Enforcement Affairs
Bureau of International Security & Non- Proliferation Sanction
Central Intelligence Agency
Commodity Futures Trading Commission
Court of International Trade
Department of State



4 List of Sources Monitored (A-Z)

(Financial and Market Regulators, Ministries, Law Enforcement and Anti-Corruption Units)

United States of America

- Department of State – Directorate of Defense Trade Controls
- District Attorney’s Office
- Department of Commerce - Bureau of Industry and Security
- Department of Health & Human Services - Office of Inspector General
- Department of Health & Human Services – US Food and Drug Administration
- Department of Homeland Security – US Customs and Border Protection
- Department of the Treasury
- Department of the Treasury - Financial Crimes Enforcement Network (FinCEN)
- Department of the Treasury - Office of the Comptroller of the Currency (OCC)
- Department of the Treasury - Office of Environmental Protection Agency
- Excluded Parties List System (EPLS)
- Federal Bureau of Investigation
- Federal Deposit Insurance Corporation
- Federal Reserve Board
- Federal Trade Commission
- Financial Crimes Enforcement Network
- Financial Industry Regulatory Authority
- Food and Drug Administration
- Foreign Assets Control (OFAC)
- Federal Deposit Insurance Corporation (FDIC)
- Federal Reserve Board
- Federal Trade Commission
- Financial Industry Regulatory Authority (FINRA)
- Immigration and Customs Enforcement
- National Association of Securities Dealers
- National Credit Union Administration
- National Futures Association
- Naval Criminal Investigative Service (NCIS)
- Occupational Safety and Health Administration
- Office of Inspector General
- Office of the Comptroller of the Currency
- Office of Thrift Supervision
- Rewards for Justice
- Securities and Exchange Commission (SEC)
- United States Bureau of Alcohol, Tobacco, Firearms and Explosives
- United States Department of Justice – Antitrust Division

4 List of Sources Monitored (A-Z)

(Financial and Market Regulators, Ministries, Law Enforcement and Anti-Corruption Units)

United States of America	United States Department of Justice – Civil Division
	United States Department of Justice – Executive Office for Immigration Review (EOIR)
	United States Department of Justice – Office of the Pardon Attorney
	United States Department of Justice – Office of Public Affairs
	United States Department of Justice – Office of the Coordinator for Counterterrorism
	United States Department of Justice – Bureau of Diplomatic Security
	United States Drug Enforcement Administration
	United States Marshals Service
	United States Naval Criminal Investigative Service
	United States Postal Inspection Service
	US Air Force Office of Special Investigations
	US Secret Service
	US Treasury
	Alabama Securities Commission
	Alabama Medicaid Agency
	Arizona Department of Insurance
	Attorney’s Office (Regional)
	Douglas County Sheriff
	Federal Bureau of Investigation (Regional)
	Idaho Medicaid Provider
	Kansas Bureau of Investigation
	Kentucky State Police
	National Credit Union Administration
	Nevada Gaming Commission and State Gaming Board
	New Jersey State, Department of Labour and Workforce Development
	New York Department of Taxation and Finance
	New York State Banking Department
	New York State Insurance Department
	New York State Office of the Medicaid Inspector General
	New York Stock Exchange
	Office of Securities (State of Maine)
	Oklahoma County Sheriff’s Office
	Pennsylvania Department of Public Welfare
	Pennsylvania Department General Services
	State of Connecticut Department of Social Services
	State of New Jersey Casino Control Commission

4 List of Sources Monitored (A-Z)

(Financial and Market Regulators, Ministries, Law Enforcement and Anti-Corruption Units)

United States of America	<p>South Carolina Department of Health and Human Services</p> <p>Tennessee Bureau of Investigation</p> <p>Tennessee Department of Health</p> <p>Texas Department of Aging and Disability Services</p> <p>Texas Department of Public Safety US Law Enforcement (Regional)</p> <p>Washington State Department of Financial Institutions</p> <p>Washington State Office Of The Insurance Commissioner</p> <p>Wisconsin Department of Transportation</p>	
Uruguay	Banco Central del Uruguay	
V		
Venezuela	Superintendencia Nacional de Valores	
Z		
Zambia	<p>Zambia Revenue Authority (ZRA)</p> <p>Securities and Exchange Commission (SEC)</p> <p>Zambia Anti-Corruption Commission</p>	
Zimbabwe	<p>Securities Commission of Zimbabwe (SCZ)</p> <p>Reserve Bank of Zimbabwe</p> <p>Zimbabwe Revenue Authority (ZRA)</p>	
Other	<p>Eastern Caribbean Central Bank</p> <p>Restrictive measures (sanctions) in force</p> <p>4th EU Money Laundering Directive</p> <p>European Parliament</p> <p>European Sanction</p> <p>West African Economic and Monetary Union</p> <p>West African Monetary Union</p> <p>Union Conseil regional de l'épargne publique et des marchés financiers (CREPMF)</p> <p>Commercial Crime Services</p> <p>Red Corner Notices etc</p> <p>UNCAC</p> <p>Security Council – Sanctions</p> <p>Listing of Ineligible Firms & Individuals</p> <p>De Barred List</p> <p>Financial Action Task Force</p> <p>Joint Anti Money Laundering Steering Group</p> <p>Wolfsberg Group</p> <p>CIA World Factbook</p> <p>CIA World Leaders</p> <p>List of Debarred Entities</p> <p>The FBI Ten Most Wanted Fugitive List</p>	<p>European Union</p> <p>European Union</p> <p>European Union</p> <p>European Union</p> <p>International Chamber of Commerce (ICC)</p> <p>Interpol</p> <p>United Nations</p> <p>United Nations</p> <p>World Bank</p> <p>World Bank</p> <p>G7</p> <p>CIA</p> <p>CIA</p> <p>African Development Bank</p> <p>FBI</p>