

# Russian counterparties sanctions compliance screening



*A solution for companies working in Russia or doing business with Russian entities.*

The large and growing list of sanctions against Russian businesses and individuals can be difficult to navigate. Risk Advisory can help you manage this with a new online tool for counterparty screening, giving you confidence that you are trading legally.

Our service screens the owners and directors of your counterparties to ensure they are not affiliated with sanctioned entities or individuals. Our extensive experience and access to information in Russia often enables us to identify beneficial owners even when steps have been taken to obscure them.

## **ABOUT US:**

Risk Advisory is a leading, independent global risk management consultancy. We provide intelligence, investigation and security services to clients that include many of the world's leading corporate entities, financial institutions and law firms.



## **KEY FEATURES:**

Quick turnaround & flexible pricing options

Batch uploads of multiple counterparties

Comprehensive research of official & commercial sources

Combination of automated & manual retrieval of data

Review & analysis by our experienced in-house staff

Secure cloud-based platform

You can access our free consolidated list of Ukraine-related sanctions [here](#)

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## EXAMPLE 1

Analysis of corporate disclosures (lists of affiliated parties, quarterly reports) used to reveal up-to-date ownership structure.

No	Name	Country	Shareholders / UBO				Sanctions	Comment	Source of information
			Level 1	Level 2	Level 3	UBO			
1	OAO Russian Company	Russia					No		
				PAO Company (98.28%), Russia			No		List of affiliated parties dated 31.12.2014
					Russian State (100%) via the Federal Agency for State Property Management		No		Quarterly report dated 16.02.2015
				Sergey Petrov (0.002%)			No		List of affiliated parties dated 31.12.2014
				Eduard Ivanov (0.002%)			No		Quarterly report of dated 16.02.2015
				Gennady Semionov (0.002%)			No		List of affiliated parties dated 31.12.2014

## EXAMPLE 3

Research established that the company is ultimately owned by a Russian bank subject to sectoral sanctions.

No	Name	Country	Shareholders / UBO				Sanctions	Comment	Source of information
			L1 shareholders	L2 shareholders	L3 shareholders	L4 shareholders			
3	ABC Italia s.p.a.	Italy					No		
				ABC Europe Energy & Gas AG (100%), Austria			No		Extract from the registry
					ABC Holding AG (100%), Austria		No		Extract from the registry
					ABC Holdings Ltd (100%), Cyprus		No		Extract from the registry
					ABC Bank (100%), Russia	<b>Sanctional</b>	ABC Bank is subject to the capital markets restrictions (EU OFAC's directive 1) imposed by the US, EU, Canada, Switzerland, Japan.	Public information	

## EXAMPLE 2

Suggested ultimate beneficial owners identified through public domain research.

No	Name	Country	Shareholders / UBO				Sanctions	Comment	Source of information
			Level 1	Level 2	Level 3	UBO			
2	Sample Company Ltd	Jersey					No		According to the media, Sample Company Ltd is controlled by Russian businessmen Alexey Pavlov and Alexander Vinogradov
				Sample Holding N.V. (100%), Netherlands Antilles	n/a		No		Extract from the registry
						Alexey Pavlov	No		Press reports
						Alexander Vinogradov	No		Press reports

## EXAMPLE 4

Research identified a company owned by a sanctioned individual.

No	Name	Country	Shareholders / UBO				Sanctions	Comment	Source of information
			Level 1	Level 2	Level 3	UBO			
4	OOO Company X	Russia					Yes		The company is at least 50%-owned by sanctioned individuals or entities
				Company Y (50%)			No		Extract from the registry
					Individual Y (100%)		Yes		Individual Y is subject to 'blocking' sanctions by the US (SDN List)
				Company Z (50%)			No		Extract from the registry
					Individual Z (100%)		No		Individual Z is the son of Individual Y

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