

Welcome to the business of certainty



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A Moody's Analytics Company

Masters of corporate ownership

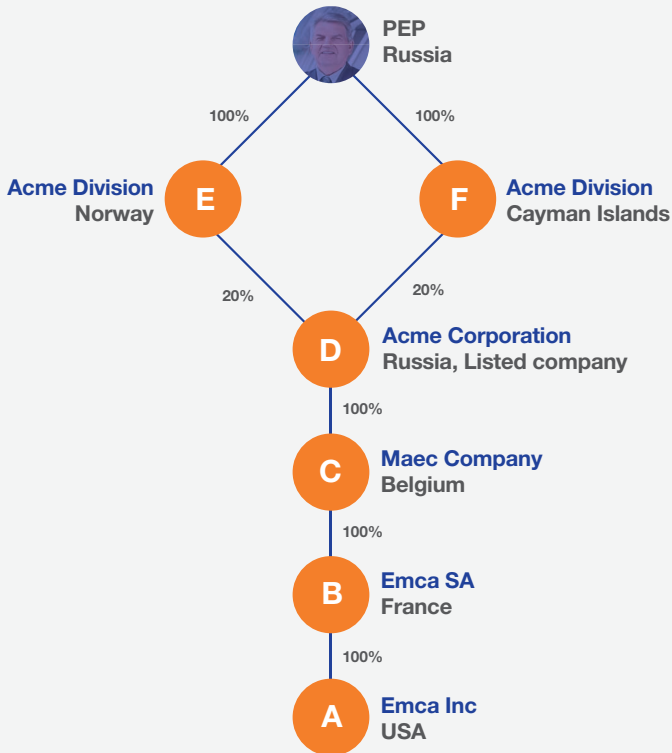
**We are the go-to resource for
corporate and beneficial ownership.**

Our corporate trees show the ownership structures of your potential and existing business partners and third-party associates, including the beneficial owners.

You can review their corporate group as a whole and check it for adverse news, as well as PEPs and sanctions. We can even show you indirect links from companies to sanctioned entities.

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| Russian beneficial owner of a US company



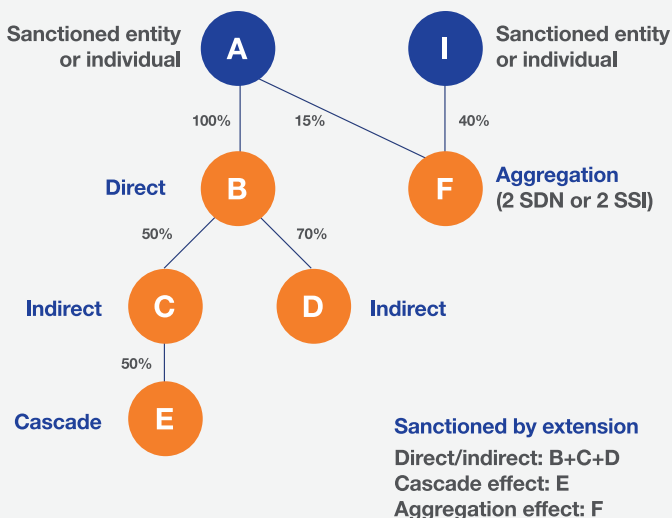
In this example you see a US company that is owned by a Russian PEP, with an aggregated percentage of 40%. The ownership structure has multiple levels and spans across Europe, as well as the Cayman Islands.

If this ownership structure was investigated manually, most would stop at Acme Corporation (D). However, using our extensive corporate structures, we can identify the full ownership of the company.

- Emca SA (B) is owned by Maec Company (C), which has been confirmed by information filed by both companies.
- C is owned by Acme Corporation (D), a Russian company that has two owners with 20% ownership – one in Norway (E) and the other in the Cayman Islands (F).
- E and F are both owned by the Russian PEP, which means his indirect ownership of Emra Inc (A) is 40%.

With a beneficial owner threshold of 25%, as per FinCEN's CDD Rule and EUAML4, it is only possible to identify the Russian PEP as a beneficial owner because we know the whole ownership structure.

| The 50% rule in sanctions compliance



OFAC (and EU) sanctions lists show just the tip of the sanctions iceberg. This is because they list only explicitly sanctioned persons and entities. However, a company is “sanctioned by extension” under the OFAC and EU “50% rule” if each of the ownership links in an unbroken chain between it and a person or entity on the list is 50% or more. Identifying these relationships is tough, and keeping up with frequent ownership percentage changes is even harder.

We help a lot of companies with sanctions compliance. Using our compliance solutions, you can create snapshot lists of companies that, at that point in time, are sanctioned by extension.