

CONTENT DEFINITION GUIDE



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Version Number	Revision Date	Revision Details
1.0	June 2015	Enhanced Country Risk – Russia/Ukraine SDN related Entities updated Special Interest Person – Lower Threshold updated Adverse Media (AME) updated Extent of coverage added Description of Active/Inactive Status added New risk icons added
1.1	March 2016	Sanctions Ownership Research (SOR) added Cities & Ports (“Locations”) added Description of Active/Inactive Status updated
1.2	October 2017	Removal of profiles from Dow Jones Risk & Compliance updated International NGO Officials category description updated Acquittal policy added to Special Interest Person section
1.3	November 2017	Expansion of Sanctions Ownership Research (SOR) content to include content previously categorised as Enhanced Country Risk Revision of Enhanced Country Risk vessel coverage
1.4	January 2018	Sanctions Lists and Other Official Lists descriptions updated
1.5	December 2018	International NGO removed PEP roles updated Icons revisions Updated ECR vessels
1.6	August 2019	Description of Other Official List Advisories added
1.7	January 2020	Changes to reflect revisions to the names of content sets: <ul style="list-style-type: none"> - Sanctions Ownership Research (SOR) to Sanctions Control & Ownership (SCO) - State Owned Companies (SOC) to State-Owned Companies (SOC) - Enhanced Country Risk (ECR) – Ships to Enhanced Country Risk (ECR) – Vessels Other Official Lists (OOL) description updated Vessels section under Sanctions Lists updated Vessels section under Other Official Lists added



		<p>Special Interest Person (SIP) Acquittals section updated</p> <p>Special Interest Persons (SIP) section updated to include link to Threshold document</p> <p>Political Pressure and Labour Group Officials PEP category definition updated</p> <p>Adverse Media Entities (AME) category definitions expanded</p> <p>Inactive status for Adverse Media Entities (AME) content updated</p>
1.8	June 2020	<p>Changes to reflect the new icon for Sanctions Control & Ownership (SCO) content</p>
2.0	June 2023	<p>Removal of profiles from Dow Jones Risk & Compliance updated</p> <p>Replacement of reference to IHS Markit with reference to S&P Global Market Intelligence</p> <p>Sanctions Control & Ownership (SCO) updated</p> <p>Definitions of company relationships updated</p> <p>Cities & Ports (Locations) updated</p> <p>Marijuana Related Businesses (MRB) added</p> <p>Money Services Businesses (MSB) added</p> <p>About Dow Jones updated</p> <p>About Dow Jones Risk & Compliance updated</p> <p>Minor specifications, rephrasing and style edits throughout the document</p>

1 Introduction

Dow Jones Risk & Compliance provides accurate, comprehensive and up-to-date solutions for risk management and corporate governance in the areas of anti-money laundering, anti-corruption, sanctions, counter-terrorism financing and international trade compliance.

Created and updated by Dow Jones, Risk & Compliance content comprises quality data that is structured, extensible and timely, with a market-leading quantity of secondary-level identifiers to help reduce false positives and save time and money during client and third-party screening.

Dow Jones Risk & Compliance has the following content components:

- Watchlist
- State-Owned Companies
- Adverse Media
- Cities & Ports (Locations)
- Marijuana Related Businesses¹
- Money Services Businesses²

2 Key Research Principles

In order to create, manage and maintain such a valuable resource, a solid infrastructure and rigorous procedures are obviously required. The Dow Jones Risk & Compliance Research team, based in London, Barcelona, Princeton (NJ), Singapore and Shanghai, works to the high editorial and integrity standards and guidelines of Dow Jones. All members of the Research team are in-house linguists recruited for their research skills, country expertise and understanding of the political and corporate landscape in their specialist regions. All members of staff receive continuous training to ensure consistently high standards are met. The team also benefits from having a Quality Director overseeing a Quality team focusing on data integrity and quality management, and a List Assurance team focusing on ensuring the accurate reflection in Risk & Compliance of sanctions data. A Standards team is in place to ensure conformity with data protection law and to handle data access requests.

Dow Jones ensures the Risk & Compliance content offering is accurate by using a research methodology that places particular emphasis on the following aspects:

¹ Depending on what service a user is subscribed to they may also have access to Marijuana Related Businesses (MRB) content.

² Depending on what service a user is subscribed to they may also have access to Money Services Businesses (MSB) content.

2.1 Coverage Definition

The key to a successfully structured Risk Database is defining what qualifies for inclusion. Before embarking on building a content set, Dow Jones analyses regulatory and market requirements relating to the particular risk. Where regulatory requirements are general and open to interpretation, Dow Jones builds out a definition. For example for Politically Exposed Persons (PEP), Dow Jones has created structured Occupation Categories to provide users with the flexibility to take a risk-based approach.

2.2 Adding Profiles on Dow Jones Risk & Compliance

The process of adding profiles to Dow Jones Risk & Compliance begins with ensuring the individuals or entities fit the coverage criteria, whether they are PEPs, relatives or close associates of PEPs, Sanctions Control & Ownership entities, State-Owned Companies or part of any other of the content sets.

2.3 Secondary Identifiers

In order to enable users to clear or confirm any possible name matches between their data and Dow Jones Risk & Compliance data, the Research team strives to find as many secondary identifiers for the individuals or entities as possible from publicly available information. Secondary identifiers for people include gender, original script name, date and place of birth, address, ID information such as passport numbers and image where available. Secondary identifiers for companies include address, company website, government ownership percentage, registration date, unique company registry numbers such as DUNS and industry name.

To provide as complete a picture as possible, the Research team provides information on Associated Entities linked to profiles of individuals in Watchlist and State-Owned Companies. This additional information is sourced from Dow Jones Companies & Executives.

2.4 Consolidated Profiles

In an effort to provide the most complete information, those people or entities falling into different Dow Jones Risk & Compliance categories will have only one consolidated profile. For example, a senior public official who also appears on a sanctions list will be classified both as a Politically Exposed Person as well as a Sanctioned individual.

2.5 Sources

Quality of output is determined by the quality of input, so it is key that only the most authoritative sources available are used when gathering data. The Research team draws on a variety of credible, respected, publicly available sources to ensure that the profile information is as accurate, complete and up-to-date as possible. Sources include government and other official websites, government directories, Factiva (the Dow Jones news archive of almost 33,000 sources such as newswires, newspapers, periodicals, press releases and other sources going back over 30 years), additional online newspapers and periodicals not available on Factiva, print or online directories and company websites for company data.

Where possible, information from one source is confirmed and verified from other sources. However, this might not be possible where publicly available information is very limited.

Where there is a conflict of information, every effort is taken to confirm the correct details.

2.6 Tracking Changes

The sanctions and political landscape around the world shifts continuously, with changes taking place regularly to sanctions designations and the ownership of major political posts. The corporate panorama also shifts, affecting the stakes held by the government, whether as the result of privatisations or nationalisations, or affecting stakes held by sanctioned subjects. In order to reflect these changes in a timely manner, the Research team monitors the news, websites of regulators, corporate registries, government websites and other sources for changes to ensure that any relevant updates are incorporated into the profiles as soon as possible after the events.

2.7 Scheduled Rewrites

As part of the process to keep the data current, profiles are refreshed on a regular basis, with those carrying potentially the most risk being monitored the most regularly.

2.8 Measuring Quality

Dow Jones Risk & Compliance data is subject to a quality-monitoring programme involving regular internal audits of data for each category to ensure the information is accurate, consistent, complete and current. Industry standard precision and recall scoring is applied to the audited data and the results fed back on an individual and team basis. Figures are compiled and reviewed every month in order to analyse the breadth and scope of information available and what is reflected on the Dow Jones profiles.

In addition, regular and ad-hoc reports are produced for the Research team as part of the quality review process with over 500 specific quality checks carried out on the entire database on a monthly basis.

In light of the importance of providing quality and timely data in the area of sanctions, an annual review is carried out by a Big 4 accountancy company into the suitability of the design and operating effectiveness of the controls around the Dow Jones sanctions platform and data set in order to maintain these high standards.

2.9 Feedback

Dow Jones welcomes client feedback on profiles on the database. Questions or comments can be escalated through a number of channels, such as Live Help, Feedback or Support buttons in the online versions of the product or direct contact with Dow Jones Customer Service via phone or email.


2.10 Removal of profiles from Dow Jones Risk & Compliance

Profiles may be removed if they are found to be duplicates (the details from the separate profiles are merged into one profile) or quality checks show the individual or entity does not fit current coverage criteria. Dow Jones reserves the right to withdraw names from Dow Jones Risk & Compliance where the information stored is incomplete because sources are unavailable and further information is not accessible to confirm the status of an individual or an entity.

Dow Jones will also remove Ships categorised as Enhanced Country Risk when they are no longer associated with a sanctioned country.

Special Interest Persons

Special Interest Person (SIP) profiles (as defined in section 3.4) will be removed in cases where 20 years have passed since conviction and the individual received a prison term of 20 years or less, or where 20 years have passed since the last update to the underlying case.



SIP profiles will also be removed in cases where the individual was acquitted and five years have elapsed since the acquittal became final.

Profiles will be removed in their entirety unless coverage is justified for other reasons, in which case only the SIP-related details will be removed.

[Individuals with Other Official Lists or Other Exclusion Lists category](#)

Profiles of individuals in the Other Official Lists (OOL) and Other Exclusion Lists (OEL) content sets will be removed 20 years after the expiry of their listing. In cases where a profile has more than one OOL and/or OEL listing, the profile's removal date will be determined by the expiry date of the most recent List Reference.

In addition, OOL and OEL profiles of individuals will be removed if we are aware that their listing relates to a criminal case that ended in acquittal more than five years ago.















Profiles will be removed in their entirety unless coverage is justified for other reasons, in which case only the OOL/OEL list-related details will be removed.

3 Watchlist (WL)








Watchlist is made up of the following:

- Politically Exposed Person (PEP)
- Sanctions Lists (SAN)
- Sanctions Control & Ownership (SCO)
- Other Official Lists (OOL)
- Other Exclusion Lists (OEL)
- Enhanced Country Risk (ECR)
- Special Interest Person (SIP)
- Special Interest Person – Lower Threshold (SIP LT)
- Relative or Close Associate (RCA)

Below shows the profile types and their descriptions, to understand the profile categorization behind each type refer to the FAQ [here](#):

Profile Type	Description
 PEP	Politically Exposed Person
 SAN	Sanctions List – Person
 SAN	Sanctions List – Entity
 SAN	Sanctions List – Entity (Ship/Vessel)
 SAN	Sanctions List – Entity (Aircraft)
 SAN	Sanctions List – Entity (Country)
 SAN	Sanctions List – Entity (Bank)
 SCO	Sanctions Control & Ownership – Entity
 SCO	Sanctions Control & Ownership – Entity (Bank)
 OOL	Other Official Lists – Person
 OOL	Other Official Lists – Entity
 OOL	Other Official Lists – Entity (Ship/Vessel)
 OOL	Other Official Lists – Entity (Aircraft)
 OOL	Other Official Lists – Entity (Country)



 OOL	Other Official Lists – Entity (Bank)
 OEL	Other Exclusion Lists – Person
 OEL	Other Exclusion Lists – Entity
 ECR	Enhanced Country Risk – Entity (Ship/Vessel)
 SI	Special Interest – Person (Lower Threshold)
 SI	Special Interest – Person
 RCA	Relative or Close Associate

3.1 Politically Exposed Person (PEP), Relative or Close Associate (RCA)

3.1.1 Politically Exposed Person (PEP)

Watchlist is a global guide to the identities of senior ranking public officials (Politically Exposed Persons), including government officials, politicians and their relatives or close associates (RCA).

Watchlist contains profiles of people who have held senior political roles at any time since January 2001.

For ease of use and to enable users to take a risk-based approach, the roles are organised into 22 carefully defined Occupation Categories. Each PEP profile contains an Occupation Title and this determines the Occupation Category to which the PEP profile is assigned. The list of Occupation Categories has been modelled on international AML guidelines, as well as national definitions from around the world.

The Occupation Category structure provides a uniform template that can be applied to every country and territory in the world and ensures consistent and complete coverage of senior political figures.

PEP Occupation Category Definitions

The Dow Jones PEP definition was drawn up using as a basis FATF Recommendation 6, as it was at the time, since revised in 2012 to Recommendation 12, along with other regulatory definitions, in conjunction with feedback from clients and industry comment. The aim of this definition is to provide the best possible coverage of senior political figures for every single country in the world. Middle-ranking and junior-ranking officials are deliberately not included within the scope of the Dow Jones PEP definition, as identifying these types of persons is not required by PEP regulations. Concentrating our research and monitoring on senior officials also ensures Watchlist clients are kept up-to-date with the highest areas of potential PEP risk without the challenges of managing an enormous list of low-level, low-risk officials.

Additional Domestic Screening Requirement (ADSR)

Several governments around the world incorporate a specific domestic PEP definition in their anti-money laundering regulations. These definitions can be broad, often including lower level individuals. In order to help clients comply with those countries' regulations, Dow Jones includes the lower level individuals as PEPs. As not all clients are required to screen for these domestic PEPs, such content is clearly marked: Category 2/Description 2 value Additional Domestic Screening Requirement is applied to all PEP profiles that are not part of the Dow Jones global PEP definition, but are included in a domestic definition. Clients can use this description to include or exclude PEPs that are part of the enhanced domestic definition of a certain country. For additional information and the list of countries with ADSR content refer to the [FAQ here](#).

Inactive PEP

When a PEP moves out of a PEP role and has no current one, their status will become Inactive and their Occupation Title will read "See Previous Roles". If a PEP has died, the Occupation Title will read "Deceased". The profiles of inactive PEPs will not be removed from the database even after they leave their roles or after their death. For further details about the active/inactive status on profiles see Appendix 2.

The following PEP Occupation Categories are available:

- Heads & Deputies State/National Government
- National Government Ministers
- Members of the National Legislature
- Senior Civil Servants–National Government
- Senior Civil Servants–Regional Government
- Embassy & Consular Staff
- Senior Members of the Armed Forces
- Senior Members of the Police Services
- Senior Members of the Secret Services
- Senior Members of the Judiciary
- State Corporation Executives
- State Agency Officials
- Heads & Deputy Heads of Regional Government
- Regional Government Ministers
- Religious Leaders
- Political Party Officials
- International Organisation Officials
- City Mayors
- Political Pressure and Labour Group Officials
- Other
- Local Public Officials
- International Sporting Organisation Officials

Heads & Deputies State/National Government

Presidents, Premiers, Chancellors, Prime Ministers and their deputies and royal heads of state can be found in this category.

National Government Ministers

This category contains a country's government ministers, e.g., Minister of Finance, Minister of Foreign Affairs and Secretary of Defense (U.S.).

Members of the National Legislature

This category contains members of the bodies/assemblies making up the national legislature – whether unicameral, bicameral, tricameral, e.g., members of the House of Commons (lower house) and House of Lords (upper house) for the U.K., House of Representatives and Senate for the U.S., members of the State

Duma and Federal Council for Russia, the Bundestag and Bundesrat for Germany and the Nationalrat and Ständerat for Switzerland.

Senior Civil Servants–National Government

This category contains the uppermost levels of the national civil service. For instance, it contains those in the position of Permanent Secretary in the U.K., Staatssekretär in Germany, Deputy Secretary in the U.S. or equivalent, that is the top level tier in the civil service, plus the next level down (this is Director General level in the U.K.). As a general rule, deputy government ministers such as Deputy Minister of Finance, First Deputy Minister of Transport are to be found in this category.

This approach works for countries where structured information is available. For other countries, where Watchlist relies on news coverage only, names and occupation titles may arise in the press and it is difficult to assess the exact seniority of the individual. If they seem suitably senior, they will be included.

Senior Civil Servants–Regional Government

This category contains the uppermost levels of the regional civil service. Titles vary depending on the country concerned, but include those like State Secretary for a particular region, General Secretary, Director. Getting data for the uppermost tiers of regional civil service works for countries where structured information is available. For other countries, where Watchlist relies on news coverage only, names may arise in the press and it is difficult to assess the exact seniority of the individual. If they seem suitably senior, they will be included.

Please note not all countries have what would be classified as a regional civil service system and so not all countries will have entries in this category.

Embassy and Consular Staff

Watchlist aims to cover the top two positions at a country's foreign representations and the top position at a country's consulates. Roles included are: Ambassador, Deputy Head of Mission, Chargé d'Affaires, Consul General.

A country's Permanent Representative to the U.N. and other international organisations also come under this category.

Please note Honorary Consuls are not covered.

Senior Members of the Armed Forces

Watchlist covers the top post holders for the army, navy and air forces. Positions such as Chief of General Staff, Deputy Chief of Staff, Commander are included. In addition, Watchlist follows the structure of the country's armed forces and ensures the coverage of all the roles that are deemed senior within that structure.

This approach works for countries where structured information is available. For other countries, where Watchlist relies on news coverage only, names may arise in the press and it is difficult to assess the exact seniority of the individual. If their role seems suitably senior, they will be included. People of lesser rank in some countries have a significant role; often it is the role rather than the military rank that is important.

Where available (this tends to be for developed countries) Watchlist includes the military rank and job title by putting the job title in Occupation Title with rank in the title field.

For less developed countries or where less information is available, the only details available for Watchlist might be the military rank in which case it will go into the Occupation Title.

Senior Members of the Police Services

Watchlist aims to include the chief of the national police and the chief of regional police forces as a minimum for each country. For some countries where information is more readily available Watchlist has been able to extend coverage.

Senior Members of the Secret Services

This category contains the names of senior members of the secret services/intelligence community as available in directories/press/government websites. The nature of this role means there are unlikely to be many entries in this particular category for each country.

Senior Members of the Judiciary

Watchlist contains details of judges from a country's highest judicial bodies, such as supreme courts, high courts, constitutional courts.

State Corporation Executives

This category contains senior executives (including all board members) of corporations that are directly majority owned by the national government, operate in key industries at a national level and are not subsidiaries. These profiles carry an additional Description, Board Member.

State Agency Officials

This category contains top officials at the main state agencies including central banks, financial market supervisors and other regulatory bodies.

Heads & Deputy Heads of Regional Government

Regional/state prime ministers, presidents, premiers, governors, chief ministers and their deputies are to be found in this category.

Regional Government Ministers

This category contains ministers in regional government, where these exist. Not all countries have regional governments and so not all countries will have entries in this category.

Religious Leaders

This category contains leaders of major faith traditions.

Political Party Officials

This category contains leaders, deputy leaders, directors and members of the national councils/executives/boards of political parties with representation in national parliaments.

International Organisation Officials

This category contains leaders and senior officials of international organisations, e.g., the United Nations, European Union, Organization of American States, Association of Southeast Asian Nations, World Trade Organization and North Atlantic Treaty Organization.

City Mayors

This category contains the mayors of capitals, regional capitals and major large cities (those with a population of over 100,000).

Political Pressure and Labour Group Officials

This category contains leaders and senior officials of major interest groups that seek to influence public policy and legislation in relation to their particular priorities, for example major national labour groups, trade unions and employers' associations.

Other

The use of this occupational category is defined on a country-by-country basis and the roles included are those that are considered senior within a certain region/country but do not have an equivalent in others. Some examples of roles included here are:

Political power brokers for a particular country but for whom no general global occupation category applies, for example, tribal chiefs in certain African countries

Political power brokers where a global occupation category could be applied, but who are exercising their occupation in a territory that is not recognized by the majority of countries as an independent country, for example, the Nagorno-Karabakh Government in Azerbaijan.

Local Public Officials

This category is for officials defined by official national PEP regulations but who fall outside any of the existing PEP Occupation Categories. Examples would be Members of Regional Parliaments and Members of Local Councils. This category is not populated for every country as only a limited number of countries have defined local public officials in their national PEP regulations.

International Sporting Organisation Officials

This category contains senior officials of the International Olympic Committee and executives from international sporting organisations representing official Olympic sports, e.g., FIFA, FIBA and the International Golf Federation. Coverage of this category began in January 2012.

3.1.2 Relative or Close Associate (RCA)

Apart from establishing the need to identify Politically Exposed Persons, Anti-Money Laundering regulations stipulate relatives and close associates of PEPs should be monitored to the same extent as Politically Exposed Persons. Watchlist defines Relatives or Close Associates (RCA) as the immediate family members of a person and their closest non-familial associates.

Relatives of a person include wife, husband, siblings, children, parents, aunts and uncles, nieces and nephews, cousins, step-children, etc.

Close associates are people who have a close business or personal relationship with a PEP. All relationships must be sourced from reputable and publicly available information. If a relationship is found to no longer be current, it will be marked to show it is a former relationship (e.g. Ex-Husband).

Type	Definition
WIFE	Female partner by marriage
HUSBAND	Male partner by marriage
BROTHER	Male sibling
SISTER	Female sibling
SON	Male child (including adopted)
DAUGHTER	Female child (including adopted)
MOTHER	Female parent (including of adopted children)
FATHER	Male parent (including of adopted children)
COUSIN	Male or female first cousin
STEP-SON	Son of spouse or partner by their former partner
STEP-DAUGHTER	Daughter of spouse or partner by their former partner
BROTHER-IN-LAW	Brother of spouse or partner; husband or partner of sister
SISTER-IN-LAW	Sister of spouse or partner; wife or partner of brother
UNCLE	Brother of father or mother
AUNT	Sister of father or mother
MOTHER-IN-LAW	Mother of spouse or partner
FATHER-IN-LAW	Father of spouse or partner
GRANDFATHER	Father of father; father of mother

GRANDMOTHER	Mother of father; mother of mother
SON-IN-LAW	Husband or partner of daughter
DAUGHTER-IN-LAW	Wife or partner of son
NIECE	Female child of brother or sister
NEPHEW	Male child of brother or sister
GRANDSON	Male child of child
GRANDDAUGHTER	Female child of child
STEPFATHER	Husband or partner of mother, but not person's biological father
STEPMOTHER	Wife or partner of father, but not person's biological mother
BUSINESS ASSOCIATE	Business partners or associates, especially those who share (beneficial) ownership of legal entities with the PEP
FRIEND	Where sources indicate a close personal relationship
FINANCIAL ADVISER	Those acting as financial advisers for person
LEGAL ADVISER	Those acting as lawyers for person
COLLEAGUE	Those working as colleagues with person, excluding colleagues working in the same environment, e.g. a member of the national legislature will not be linked as a colleague to all other members of the national legislature
AGENT/REPRESENTATIVE	Those acting as agents/representatives for person
EMPLOYEE	Those being employed by person or entity
ASSOCIATE	Any non-relative closely associated with a person where the type of association is not specified
CHILD	For those children whose gender cannot be ascertained from sources
FAMILY MEMBER	Individuals where sources state an individual is closely related to person but where no further information on the nature of the family relationship is available
POLITICAL ADVISER	Political advisers who do not hold such a post in an official PEP capacity
SENIOR OFFICIAL	Officials who hold a senior position at a sanctioned entity but who are not sanctioned



UNMARRIED PARTNER	Male or female partner, without being married to person. This includes common-law partners.
SAME-SEX SPOUSE	Spouse of the same gender
EMPLOYER	Those who employ the person

It should be noted that this relationship grid is not exclusive to the PEP content and many of these relationships can be used to link other types of profiles, for example those on Sanctions and Other Official Lists or Special Interest Persons.

3.2 Sanctions Lists (SAN), Other Official Lists (OOL), Other Exclusion Lists (OEL), Enhanced Country Risk (ECR) - Vessels

Risk & Compliance profiles contain the names of individuals, companies, organisations, aircraft, banks and vessels contained in over 900 current national and international official lists, covering more than 70 jurisdictions. Lists published by the U.S. Office of Foreign Assets Control (OFAC), the United Nations and the European Union are included.

A document providing full details of list coverage is updated weekly and is available at:

<https://customer.dowjones.com/faq/list/9114?pos=5&page=1>

All critical information, such as names, aliases and dates of birth, are included in these profiles. The Research team also includes identification numbers (e.g., passport, national ID cards), place of birth and citizenship details when these are specified in the official list. Persons and entities cited on more than one list will have all list citations consolidated into a single profile. All Sanctions Lists, Other Official Lists and Other Exclusion Lists profiles are sourced directly from official government and agency sources. Where appropriate and available, additional details and information are taken from reliable, publicly available sources.

This content is monitored and updated regularly to ensure that any additions, modifications or deletions from these sensitive lists are reflected in the Risk & Compliance products in a timely manner. The monitoring process uses a combination of sources: email alerts, official websites, automated and manual checks.

3.2.1 Sanctions Lists (SAN)

The Sanctions Lists category includes lists of persons and entities subject to comprehensive or targeted restrictive measures. People and entities are added to Sanctions Lists for various reasons, including: having links to terrorism, terrorist financing, proliferation of weapons of mass destruction, arms trafficking, narco-trafficking, human rights abuse or war crimes.

Such lists are issued by government agencies or bodies, including Financial Intelligence Units (FIUs), regulators or police, and are government instructions that regulated institutions have a legal obligation to screen against.

Examples of the effects of Sanctions Lists include the freezing of funds and economic resources, admission restrictions on certain persons, arms embargoes, trade/export restrictions and a ban on the provision of certain services to certain countries.

Financial Sanctions

Financial sanctions refers to either i) the freezing or blocking of funds and/or economic resources or ii) the rejection of prohibited business transactions, under conditions defined by the regulator.

Visa/Travel Ban

These lists contain the names of persons on whom travel restrictions have been placed by governments. They are often placed in conjunction with financial sanctions. Vessels may also be subject to restrictive measures regarding entry to ports if designated by a sanctioning body.

Exclusion List

This type of list contains persons and/or entities barred from certain activities by government bodies. Examples of the type of activity that may be barred are: exporting out of/importing into the jurisdiction in question or a complete operating ban in the jurisdiction.

Examples of the kind of body that issues this type of list are: interior, defence and finance ministries and international organisations such as the European Union.

Examples of the kind of action that may result in a person/entity being listed are: violating arms export regulations or arms embargoes, suspected terrorist activity, suspected dealing in weapons of mass destruction (WMDs) and the unsafe operation of air carriers.

Trade Restrictions

This type of list covers arms embargoes or other trade restrictions against certain countries or parties.

Examples of the type of body issuing this kind of list are: finance/trade ministries and international organisations such as the United Nations.

War Crimes

War Crimes content is taken from official list sources only. All war crimes-related Lists are categorised as either Sanctions Lists or Other Official Lists. Additionally, each profile contains the extra category of War Crimes. These lists contain the names of people who have been formally charged with war crimes. They may be in custody or at large. Such lists are generally published by foreign affairs ministries, international or special courts or attorney-general's offices.

Sanctioned Vessels

Watchlist contains information about vessels that are explicitly sanctioned by a number of regulators, including those sanctioned by OFAC under the Specially Designated Nationals (SDN) List.

Profiles for sanctioned vessels are enriched with data licensed from the official provider of vessel information, [S&P Global Market Intelligence](#), including:

- Current and former names
- Current Flag
- IMO numbers

Vessels blocked under a sanctions listing are categorised as follows:

DOW JONES Watchlist	
Status:	Active
Category 1:	Special Interest Entity (SIE)
Category 2:	Sanctions Lists
Category 3:	Ship

Please note any vessels that are linked to OFAC-sanctioned countries Cuba, Iran, North Korea, and/or Syria are categorised with Description 2 Enhanced Country Risk (ECR) - please see section 3.2.4 below for further information.

The Dow Jones Research team monitors the S&P Global Market Intelligence data for updates to vessel content to make sure any relevant changes are reflected. In order to help clients identify the owner and other companies linked to vessels as well as the countries associated with these companies, additional identifying information sourced from S&P has been included in the Profile Notes of ship profiles. This information is in the following format and appears at the top of the Profile Notes:

ADDITIONAL IHS SHIP DATA:

Group Beneficial Owner:

Group Beneficial Owner Country of Control:

Group Beneficial Owner Country of Domicile:

Group Beneficial Owner Country of Registration:

Operator:

Operator Country of Control:

Operator Country of Domicile:

Operator Country of Registration:

Registered Owner:

Registered Owner Country of Control:

Registered Owner Country of Domicile:

Registered Owner Country of Registration:

Ship Manager:

Ship Manager Country of Control:

Ship Manager Country of Domicile:

Ship Manager Country of Registration:

Technical Manager:

Technical Manager Country of Control:

Technical Manager Country of Domicile:

Technical Manager Country of Registration:

3.2.2 Other Official Lists (OOL)

The Other Official Lists category includes lists of persons and entities, including vessels and aircraft, associated with one or more of the categories of potentially high-risk activities listed below. Examples of the type of body issuing this kind of list are supervisory authorities/regulators and law enforcement agencies.

Advisories

This type of list includes content issued by sanctioning bodies where the subjects are not sanctioned, yet are explicitly associated with potential sanctions risks. These lists aim to alert persons globally to sanctions risks for parties involved.

Enforcement Orders

These are penalties issued by government regulatory authorities and supervisory bodies against the persons and/or entities they regulate.

Examples of the kind of body that publishes this type of list are securities commissions, stock exchanges, and insurance regulators, futures industry regulators, banking supervisory bodies, finance ministries and central banks.

Examples of the kind of action resulting in an enforcement order are: insider dealing, fraud, unregistered trading and violations of regulatory requirements.

Examples of the kind of penalty that may be incurred are: jail sentences, fines, placing under receivership, withdrawal of registration, cease-trade orders and temporary or permanent bans on holding directorships.

Visa/Travel Ban

These lists contain the names of persons on whom travel restrictions have been placed by governments. Immigration restrictions and visa bans without economic sanctions are categorised as Visa/Travel Ban under Other Official Lists.

Vessels that are subject to de-flagging, prohibited from entering specified waters and/or transferring cargo in specified ports owing to their association with sanctioned subjects or jurisdictions are also categorised as Visa/Travel Ban under Other Official Lists. Profiles of OOL vessels are also enriched with data licensed from the official provider of vessel information, S&P Global Market Intelligence, please refer to the section on Sanctioned Vessels for the details of such enrichment.

Exclusion List

This type of list contains persons and/or entities who are barred from certain activities by government bodies.

Examples of the type of activity that may be barred are: importing/exporting of certain goods/services, doing business with the list-issuing body or any government agency in that jurisdiction or an operating ban in that jurisdiction.

Examples of the kind of body that issues this type of list are: export-control or non-proliferation authorities, interior ministries, international financial institutions and gaming commissions.

Examples of the kind of action that may result in a person/entity being listed are: violating arms-export regulations or arms embargoes, contravening the list-issuing body's guidelines and the violation of gaming laws.

Law Enforcement

This covers wanted lists issued by international, national, regional or local law enforcement agencies and other bodies responsible for investigating crimes or bringing the names of fugitives to the public's attention. Examples of this type of body are: police departments, drug enforcement agencies, intelligence agencies, interior ministries, defence ministries, corruption commissions, crimestoppers programmes, attorney-general's offices and prison services.

Trade Restrictions

This type of list contains persons/entities that may be subject to extended licence requirements for certain exports/imports, or that may require further investigation before certain exports can take place. The types of body issuing these lists are likely to be export-control or non-proliferation authorities.

War Crimes

All war crimes-related Lists are categorised as either Sanctions Lists or Other Official Lists. Please refer to 3.2.1 for War Crimes content.

Warnings

These lists are published by regulatory authorities, central banks and investor-protection organisations and contain the names of persons/entities that are not authorised to provide certain financial services in the country of jurisdiction. These lists aim to warn potential investors of the risk they may be taking in investing in these companies.

Removal of profiles from Dow Jones Risk & Compliance

For details about the removal of OOL and profiles, see section 2.10.

3.2.3 Other Exclusion Lists (OEL)

This category was added in April 2013 as a result of client requests to include lists that are not primarily used for Anti-Money Laundering purposes and which were therefore not included in our Sanctions and Other Official Lists coverage. A separate category was created in order to allow clients to easily include or exclude the content as required. Lists in the OEL category tend to have an anti-corruption focus and impose specific exclusions from public sector activities against people and/or entities operating in a particular jurisdiction, sector or industry, usually for a set period of time.

Examples of OELs include:

HHS OIG (U.S.) List of Excluded Individuals and Entities - a U.S. healthcare-related list excluding named subjects from federally funded healthcare programmes in the United States

CEIS (Brazil) National Register of Debarred and Suspended Companies - a Brazilian list of people and entities restricted from taking part in government tenders or government contracts in Brazil

Okinawa Prefectural Government (Japan) Exclusion List - a Japanese list of entities barred from participating in local government tenders.

Removal of profiles from Dow Jones Risk & Compliance

For details about the removal of OEL profiles, see section 2.10

3.2.4 Enhanced Country Risk (ECR) – Vessels

In addition to profiles for vessels that are explicitly listed on Sanctions or Other Official Lists, Watchlist leverages the Description 2 Enhanced Country Risk (ECR) to help clients identify vessels that are linked to one of the following comprehensively sanctioned countries: Cuba, Iran, North Korea, Syria. For clarity, "linked to" means that the vessel is currently under the flag of one of the sanctioned countries, and/or at least one of the sanctioned countries is associated with the ship's operator, group beneficial owner, registered owner, manager or technical manager as the country of control, domicile or registration. Only

vessels that are reported to still exist or be active are included. The country or countries that prompted the addition of the Enhanced Country Risk category are provided under Country Type Enhanced Risk Country.

The ECR categorisation can appear as a standalone description on a vessel profile, or in conjunction with SAN and/or OOL descriptions.

Once a vessel is no longer associated with a comprehensively sanctioned country, or the country itself is no longer subject to comprehensive sanctions, the profile will be removed if there is no other reason to maintain it on the database. If the vessel continues to meet coverage criteria as a current or formerly listed vessel, only the Enhanced Country Risk description and any associated data will be removed.

The data used to identify links to comprehensively sanctioned jurisdictions is sourced from the official provider of vessel information, [S&P Global Market Intelligence](#). To help clients identify the owner and other companies linked to vessels as well as the countries associated with these companies, additional identifying information sourced from S&P Global Market Intelligence has been included in the Profile Notes of ship profiles. This information is in the following format and appears at the top of the Profile Notes:

ADDITIONAL IHS SHIP DATA:

Group Beneficial Owner:

Group Beneficial Owner Country of Control:

Group Beneficial Owner Country of Domicile:

Group Beneficial Owner Country of Registration:

Operator:

Operator Country of Control:

Operator Country of Domicile:

Operator Country of Registration:

Registered Owner:

Registered Owner Country of Control:

Registered Owner Country of Domicile:

Registered Owner Country of Registration:

Ship Manager:

Ship Manager Country of Control:

Ship Manager Country of Domicile:

Ship Manager Country of Registration:

Technical Manager:

Technical Manager Country of Control:

Technical Manager Country of Domicile:

Technical Manager Country of Registration:



DOW JONES Watchlist	
Status:	Active
Category 1:	Special Interest Entity (SIE)
Category 2:	Enhanced Country Risk
Category 3:	Ship

The Dow Jones Research team monitors the S&P data for updates to ship content to make sure the relevant changes to these ships are accurately reflected.

3.3 Sanctions Control & Ownership (SCO)

Dow Jones Sanctions Control & Ownership (SCO) content covers companies owned or controlled by people or entities sanctioned by the U.S. Office of Foreign Assets Control (OFAC), the European Union (EU) and/or HM Treasury (HMT) in the United Kingdom. In addition, companies owned or controlled by the governments of countries or regions which are subject to comprehensive sanctions imposed by these regulators are included. This includes Iran, North Korea, Syria, Cuba, the region of Crimea and (formerly sanctioned) Sudan.

In order for entities to be included, they must have a corporate structure and commercial or business purpose in addition to being owned or controlled by a sanctioned subject. Profiles for these entities are linked to the profiles of related sanctioned subjects as subsidiaries or assets. Subsidiaries are covered irrespective of the level of ownership. For relationships where an entity or individual has control or where a sanctioned individual sits on the board of directors or holds a position of influence, these are linked as associates.

3.3.1 SCO Sanctioned Subject Related Content

The scope of the Sanctions Control & Ownership (SCO) content extends to identifying holdings of subjects sanctioned by the U.S. Office of Foreign Assets Control (OFAC), the European Union and/or HM Treasury in the United Kingdom. The full list of sanctions programs considered for the SCO coverage is available [here](#).

SCO Category/Descriptions

Profiles within Sanctions Control & Ownership (SCO) content are categorised in the following way:

Category 1/Description 1: Special Interest Entity (SIE)

Category 2/Description 2: Sanctions Control and Ownership

Category 3/Description 3: One or more of the following depending on the ownership level/control and the sanctioning body:

OFAC Related - Majority Owned: Identifies an entity where an actively OFAC sanctioned subject owns, directly or indirectly, 50% or more.

OFAC Related - Minority Owned: Identifies an entity where an actively OFAC sanctioned subject owns, directly or indirectly, between 10% and 49.999%.

OFAC Related - Ownership Unknown: Identifies an entity where an actively OFAC sanctioned subject owns, directly or indirectly, an unknown percentage.

OFAC Related - Control: Identifies an entity where an actively OFAC sanctioned subject is in a relationship of control*.

Formerly OFAC Related: Identifies an entity as formerly having been owned, directly or indirectly, or formerly controlled* by an actively OFAC sanctioned subject or where it has been determined that the subject which owns or controls the entity is no longer sanctioned by OFAC.

EU Related - Majority Owned: Identifies an entity where an actively EU sanctioned subject owns, directly or indirectly, 50% or more.

EU Related - Minority Owned: Identifies an entity where an actively EU sanctioned subject owns, directly or indirectly, between 10% and 49.999%.

EU Related - Ownership Unknown: Identifies an entity where an actively EU sanctioned subject owns, directly or indirectly, an unknown percentage.

EU Related - Control: Identifies an entity where an actively EU sanctioned subject is in a relationship of control*.

Formerly EU Related: Identifies an entity as formerly having been owned, directly or indirectly, or formerly controlled* by an actively EU sanctioned subject or where it has been determined that the subject which owns or controls the entity is no longer sanctioned by the EU.

UK Related - Majority Owned: Identifies an entity where an actively HMT sanctioned subject owns, directly or indirectly, 50% or more.

UK Related - Minority Owned: Identifies an entity where an actively HMT sanctioned subject owns, directly or indirectly, between 10% and 49.999%.

UK Related - Ownership Unknown: Identifies an entity where an actively HMT sanctioned subject owns, directly or indirectly, an unknown percentage.

UK Related - Control: Identifies an entity where an actively HMT sanctioned subject is in a relationship of control*.


Formerly UK Related: Identifies an entity as formerly having been owned, directly or indirectly, or formerly controlled* by an actively HMT sanctioned subject or where it has been determined that the subject which owns or controls the entity is no longer sanctioned by HMT.

*As OFAC, EU and UK regulators have broad and varying definitions of control, Dow Jones applies its own unique definition which can be represented in our Risk & Compliance data. Control related Description 3 will be used in cases where a sanctioned subject, either person or entity, or a sanctioned government holds a position of control or influence in a company. For example, where an individual sits on the Board of Directors or has an executive level role, or in the rare instances where a company has no holdings in an entity but may be listed as a sole executive body or superior governing body. Control descriptions are typically only applied in cases where a sanctioned subject is in a direct relationship with an SCO entity. It is not cascaded to entities with an indirect relationship. In the event that multiple designations apply a Control description may be used in combination with an ownership one.

In cases where an entity is owned by both a directly targeted sanctioned subject and as part of a comprehensively sanctioned government, it is possible that multiple tags may be applied detailing different levels of ownership by the targeted subject and the comprehensive program. For example a profile could be majority owned by an OFAC SDN sanctioned subject and minority owned as part of an OFAC regional sanctions program.

OFAC and EU Aggregation of Ownership Stakes

Where more than one sanctioned subject holds shares in a company we add these shares together to determine the majority or minority stake. For OFAC-related subjects we apply OFAC's aggregate rule: if more than one subject from the Specially Designated National (SDN) list or more than one subject from



the OFAC Sectoral Sanctions Identifications (SSI) list (within the same SSI directive) owns shares in an entity and the total aggregated share percentage reaches 50% or more we assign OFAC Related – Majority Owned. If the total is less than 50% we assign OFAC Related – Minority Owned. Where an entity is owned by two or more sanctioned subjects not classified under the same designation or SSI directive, we do not aggregate the holding percentage. Similarly, there is no aggregation between sanctions programs, for example, between the OFAC and European Union sanctions programs, or between EU programs or UK programs.

In addition, aggregation is now applied for EU programs using the same logic as is applied to OFAC aggregation. If more than one subject from the EU Consolidated list or more than one subject from the EU sectoral sanctions list own shares in an entity and the total aggregated percentage reaches 50% or more we assign EU Related – Majority Owned. Unlike OFAC SSI sanctions which are aggregated by Directive, EU sectoral sanctions are aggregated regardless of which annex they are listed under.

UK sanctions are not aggregated.

Sanctions Control & Ownership ID Types

Additional ID Types are included in these profiles which detail the program indicators and unique IDs of the sanctioned subjects that own or control the entities or did so in the past:

Related OFAC Program ID

Related OFAC Unique ID

Related EU Sanctions Programme Indicator

Related EU Consolidated Electronic List ID

Related HM Treasury Regime

Related HM Treasury Group ID

Each SCO entity is assigned at least one of these Related ID Types. In cases where the SCO entity is owned or controlled by multiple sanctioned subjects (regardless of the program or designating body) related ID types are added for each sanctioned subject.

International Securities Identification Number (ISIN)

Owing to OFAC, EU and UK rules prohibiting certain transactions in debt or equity under SSI or Investment Ban programs, Dow Jones monitors the issuance of securities and where new debt or equity is issued after the effective date of sanctions by any SSI-related entity (both those directly sanctioned as well as any holdings of the sanctioned subject included in the SCO content). These securities are added to the profiles using the ID type International Securities Identification Number (ISIN). In addition to the ISIN itself, where the date of issue and/or the date of maturity can be determined, those dates are also included. In the event that the ownership or control by a sanctioned subject ceases for an entity, the monitoring of ISINs is discontinued for that entity.

Additional information on ISIN coverage can be found [here](#).

Sanctioned Bank branches

As part of SCO content, profiles are created for all branches of banks sanctioned by OFAC, EU or the UK that have SWIFT BIC codes. These are categorised as Sanctions Control and Ownership - Bank.

Description 2: Sanctions Control and Ownership is added to these profiles to identify that they form part of the Sanctions Control & Ownership content.

Description 3: Bank is added to all banks and their branches which are included within the Sanctions Control & Ownership content. All sanctioned bank branches contain a SWIFT BIC code and are linked as Associates to the sanctioned bank.

In addition to the above, all bank branches have Description 3: OFAC Related – Majority Owned, EU Related – Majority Owned or UK Related – Majority Owned to reflect the sanctions imposed on the parent bank.

3.3.2 SCO Sanctioned Region Related Content

The Sanctions Control & Ownership (SCO) content set also includes entities owned or controlled by the governments of comprehensively sanctioned countries or regions. Profiles are given the categorisation of Sanctions Control and Ownership if they are owned in whole or in part (or have been owned in whole or in part since 1 January 2015) by the government of countries or regions which are or were subject to comprehensive sanctions imposed by OFAC. Currently these are Iran, North Korea, Syria, Cuba and Crimea, previously also Sudan. At this time the EU and UK do not have comprehensive sanctions by region. Please note that entities owned by the Government of Crimea are given the country value Russia. Depending on the ownership interest held by the sanctioned country or region in an entity which the Research team is able to identify, the entities are given one of the following Description 3 categories:

OFAC - Regional Sanctions Related - Majority Owned: Identifies an entity where an actively OFAC sanctioned government owns, directly or indirectly, 50% or more.

OFAC - Regional Sanctions Related - Minority Owned: Identifies an entity where an actively OFAC sanctioned government owns, directly or indirectly, between 1% and 49.999%.

OFAC - Regional Sanctions Related - Ownership Unknown: Identifies an entity where an actively OFAC sanctioned government owns, directly or indirectly, an unknown percentage.

OFAC - Regional Sanctions Related - Control: Identifies an entity where an actively OFAC sanctioned government is in a relationship of control*.

Formerly OFAC Regional Sanctions Related: Identifies an entity as formerly having been owned, directly or indirectly, or formerly controlled* by an actively OFAC sanctioned government or where it has been determined that the government which owns or controls the entity is no longer sanctioned by OFAC.

EU - Regional Sanctions Related - Majority Owned: Identifies an entity where an actively EU sanctioned government owns, directly or indirectly, 50% or more. This description is not currently in use.

EU - Regional Sanctions Related - Minority Owned: Identifies an entity where an actively EU sanctioned government owns, directly or indirectly, between 1% and 49.999%. This description is not currently in use.

EU - Regional Sanctions Related - Ownership Unknown: Identifies an entity where an actively EU sanctioned government owns, directly or indirectly, an unknown percentage. This description is not currently in use.

EU - Regional Sanctions Related - Control: Identifies an entity where an actively EU sanctioned government is in a relationship of control*. This description is not currently in use.

Formerly EU Regional Sanctions Related: Identifies an entity as formerly having been owned, directly or indirectly, or formerly controlled* by an actively EU sanctioned government or where it has been determined that the government which owns or controls the entity is no longer sanctioned by the EU. This description is not currently in use.

*See the section above on the application of Control descriptions within Sanctions Control & Ownership profiles.

OFAC 50% rule and Aggregation of Ownership Stakes for Regional Sanctions

Where more than one comprehensively sanctioned country or region holds shares in a company, holding percentages are not aggregated. Therefore if two sanctioned countries each hold 25% in an entity, it is assigned the Description 3 category OFAC Regional Sanctions Related – Minority Owned.

In accordance with OFAC’s guidelines on indirect ownership, where a comprehensively sanctioned region holds a stake of 50% or more in a company and such company, in turn, owns 50% or more in its subsidiary, OFAC Regional Sanctions Related – Majority Owned is applied to the subsidiary. In addition to the above-mentioned descriptions, entities owned by comprehensively sanctioned countries are given the Country Type “Sanctioned Region”. Where sanctions are lifted on one of the above-mentioned comprehensively sanctioned countries, the Country Type is changed to “Formerly Sanctioned Region”. ID Types related to program indicators and unique IDs of the comprehensively sanctioned countries that own or control the entities are not added to these profiles unless there is also ownership held by people or entities directly sanctioned under the OFAC, EU or UK programs.

3.3.3 Related Entities of Sanctions Control & Ownership Entities

Parent/Subsidiary	For entities and their ultimate parent company only, which is defined as the last company in the chain where the ownership is more than 50 percent at each level.
Shareholder/Asset	For person to entity relationships and for entities that are not the ultimate parent. A sanctioned individual or entity should have some shareholding in the SCO entity.
Associate/Associate	For sanctioned individuals with positions of control or influence in the company (Chairman, Director etc.), bank branches, government bodies which execute control via funds or other organisations, where they hold no shares but are able to execute control, and in rare instances where an entity has some control but no ownership (0% shareholding).

3.4 Special Interest Person (SIP)

SIP coverage encompasses individuals reported in licensed sources on Factiva as implicated in specific types of criminal activity (further detailed in 3.4.1 – 3.4.3 below). It comprises three content sets: Special Interest Person; Special Interest Person – Lower Threshold; and Organised Crime Japan.

3.4.1 Special Interest Person (SIP)

This content set contains profiles of individuals formally accused of, arrested for or convicted of serious crime within six categories:

- Corruption
- Financial Crime
- Trafficking
- Organised Crime
- Terror
- Tax Crime

In March 2006 Watchlist started to create profiles for individuals who might be considered of Special Interest owing to their reported implication in specific criminal activity. The aim of this coverage, which extends back to 2000, is to include those individuals who are prominent in the news from licensed publications on Factiva owing to their reported association with the six crime categories.

Dow Jones researchers monitor licensed Factiva publications to identify individuals to be included in these categories and write short profiles outlining the case against the individuals and providing details of the news articles from Factiva containing the information. A Politically Exposed Person can also be categorised to the above crime types as a Special Interest Person if there are news articles on Factiva linking the individual to a particular crime.

Watchlist will consider assigning SIP status to anyone who has formally been declared wanted for an offence pertaining to one or more of the crime categories; has been charged with and/or arrested on suspicion of such a crime; or has been tried/convicted/sentenced with regard to such a crime. Watchlist does not regard rumours or allegations that are not substantiated in formal legal proceedings as sufficient basis for assigning SIP status to an individual. Only criminal cases are covered; civil cases and lawsuits are not included.

Cases in which there is evidence that criminal action against an individual may be politically motivated are covered, although Watchlist editors will take care to record any claim on the part of the defendant that a case might be politically influenced and to reflect outside opinion that this may be so, provided such information is available in licensed Factiva publications.

Removal of SIP profiles

Special Interest Person (SIP) profiles will be removed in cases where 20 years have passed since the date of conviction and the individual received a prison term of 20 years or less.

Profiles will also be removed where 20 years have passed since the last update to the underlying case and no further update is available.

Profiles will be removed in their entirety unless coverage is justified for other reasons, in which case only the SIP-related details will be removed.

Acquittals

If news of an acquittal is found, information about the acquittal is added to the profile notes. The profile will be retained for a period of five years after the acquittal is final, at which point it will be removed from the database unless coverage is justified for other reasons (e.g., there is another trigger for assigning SIP status).

The same procedure is followed if individuals have charges against them dropped, are arrested but released without charge or die without being convicted.

Although SIP profiles are only created on the basis of licensed content on Factiva, information about acquittals or the resolution of cases in favour of a profile subject may be taken from other credible and respected publicly available sources.

The crime categories can be defined as follows:

- Corruption covers cases where those in a public position have allegedly abused that position and are reported to have been arrested on suspicion of, charged with or convicted of corrupt activities. Such cases might typically involve allegations of bribery, kickbacks or breach of trust. The category covers those involved in scandals such as Lava Jato (Car Wash) in Brazil and also features various current and former heads of state, for example Silvio Berlusconi of Italy and Park Geun-hye of South Korea.
- Financial Crime covers activities such as fraud, theft, money laundering and tax evasion. The reported criminal activity may be of the same type as that in the Corruption category but is committed by private individuals rather than people in public positions. Sanctions evasion is included in this category.
- Organised Crime covers crime reported as being carried out by criminal gangs and organisations.
- Trafficking covers the illegal trafficking or smuggling of narcotics, firearms, people, wildlife or commodities such as diamonds.
- Terror contains individuals arrested on suspicion of, charged with or convicted of acts relating to terrorism. The category covers those associated with or inspired by known, established or significant terrorist organisations, although not necessarily acting directly on their behalf. Coverage includes financing of terrorist acts or organisations.
- Tax Crime, which was introduced in April 2014, is applied to individuals who are reported to have committed a tax-related offence. The category covers offences such as tax fraud and tax evasion. It is never used on its own and is always applied in conjunction with another category.

Tax Crime has been added retrospectively to SIP profiles created before April 2014 whose profile notes contain the keywords *tax evasion*, *tax fraud*, *tax crime* and *fiscal crime*.

SIP coverage is designed to capture serious or high-level cases. Where possible, coverage is based on the financial value of the reported offence. The financial value – or threshold – at or above which a case is covered varies from country to country. For example, fraud involving the equivalent of just a few thousand dollars may be relatively as serious in one country as fraud involving billions of dollars in another. In the same way, the seriousness of narcotics offences and the volumes of narcotics involved in those offences may vary widely from country to country, but the relative gravity of the offences and the severity with which they are dealt may be similar. Therefore, where there is a financial aspect to the reported crime, coverage is determined by the sums involved, with SIP profiles being given to those individuals involved

in crimes above a certain financial threshold. A document containing the full list of current country thresholds is available at:

<https://customer.dowjones.com/notifications/142e21633c2f32afb78890a112347fbf>

SIP profiles contain secondary identifiers such as gender, date of birth, address and image where these are found in publicly available sources.

Watchlist links SIP involved in the same criminal case using the description Associated Special Interest Person. Such linking involves only Special Interest Persons and not individuals who are mentioned in a peripheral way without being SIP themselves. Some linked SIP profiles will also be related by blood or marriage. The family relationship takes precedence over the SIP relationship. So if, for example, a criminal case involves a father and a son, the two SIP are linked as father-son/son-father rather than as Associated Special Interest Persons.

Coverage may also include family members linked to SIP who are not themselves SIP.

The Country Type “Country of Reported Allegation” allows SIP profiles to be filtered according to the country in which the reported criminal activity took place and/or where the judicial process took place, regardless of the individual’s citizenship or residency.

3.4.2 Special Interest Person – Lower Threshold (SIP LT)

The Special Interest Person – Lower Threshold (SIP LT) content set was launched in February 2014. This content covers the United States, Canada and Asia. It captures individuals who are reported in licensed Factiva publications to have committed offences that are below the monetary-value thresholds applied to SIP content (see above for notes on SIP thresholds).

Coverage of the United States dates back to the beginning of 2000, while Canada coverage dates from September 2013. Coverage of Asia starts from 2008.

SIP LT ASIA COVERS:

Afghanistan
Bangladesh
Bhutan
British Indian Ocean Territory
Brunei
Cambodia
China
East Timor/Timor Leste
Hong Kong
India
Indonesia
Japan
Laos
Macau



Malaysia
Maldives
Mongolia
Myanmar
Nepal
North Korea
Pakistan
Philippines
Singapore
South Korea
Sri Lanka
Taiwan
Thailand
United Arab Emirates
Vietnam

SIP LT covers individuals who are reported to have committed crimes in the following areas:

- Financial Crime
- Corruption
- Organised Crime
- Trafficking
- Tax Crime

Watchlist editors will consider assigning SIP LT status to anyone who has been formally declared wanted for an offence pertaining to one or more of the crime categories; has been charged with and/or arrested on suspicion of such a crime; or has been tried/convicted/sentenced with regard to such a crime. Watchlist does not regard rumours or allegations that are not substantiated in formal legal proceedings as sufficient basis for assigning SIP LT status to an individual. Only criminal cases are covered; civil cases and lawsuits are not included. In the United States, the case must involve a felony, not a misdemeanour, to qualify for inclusion.

The crime categories can be defined as follows:

- Corruption covers cases where those in a public position have abused that position and are reported to be involved in corrupt activities. Such cases might typically involve bribery, kickbacks or breach of trust.
- Financial Crime covers activities such as fraud, theft, money laundering and tax evasion. The reported criminal activity may be of the same type as that in the Corruption category but is committed by private individuals rather than people in public positions.
- Organised Crime covers crime reported as being carried out by criminal gangs and organisations.

- Trafficking covers the illegal trafficking or smuggling of narcotics, firearms, people, human organs, wildlife or commodities.
- Tax Crime, which was introduced in April 2014, is applied to individuals who are reported to have committed a tax-related offence. The category covers offences such as tax fraud and tax evasion. This category is never used on its own and is always applied in conjunction with another category.

In SIP LT coverage the criminal activities reported in each profile are referred to as Reported Allegations (RA). The financial value of the RA is included in the SIP LT profile if this information is provided in sources on Factiva. This value is referred to as the Reported Monetary Value (RMV).

In the United States, SIP LT covers those cases in which the RMV is between USD 50,000 and USD 1 million. Individuals involved in a case with a value of USD 1 million or more are categorised as SIP.

In Canada, SIP LT covers cases where the RMV is between CAD 50,000 and CAD 250,000. Cases above CAD 250,000 are treated as SIP.

Monetary thresholds for Asian countries vary from country to country. Coverage is determined by the threshold set for SIP, with cases below that threshold being covered in SIP LT. There is no lower RMV limit for these countries, with the following exceptions:

Bangladesh: BDT 25,000 (all categories)

India: INR 100,000 (Financial Crime, Organised Crime, Trafficking); INR 5,000 (Corruption)

Pakistan: PKR 100,000 (all categories)

“Unknown” is used as the RMV where no actual values are available. In coverage of the United States and Canada it is used in cases where the value of a case is not known but there is a high probability that it matches or exceeds the lower limit for coverage.

SIP LT profiles contain secondary identifiers such as gender, date of birth, address and image where these are found in publicly available sources.

SIP LT individuals involved in the same criminal case are linked using the description Associated Special Interest Person. Some linked SIP LT will also be related by blood or marriage. The family relationship takes precedence over the Associated Special Interest Person relationship. If, for example, a criminal case involves a father and a son, the two SIP LT are linked as father-son/son-father rather than as Associated Special Interest Persons.

Coverage may also include family members linked to SIP LT who are not themselves SIP LT.

The Country Type “Country of Reported Allegation” allows SIP LT profiles to be filtered according to the country in which the reported criminal activity took place and/or where the judicial process took place, regardless of the individual’s citizenship or residency.

Summary of SIP and SIP LT coverage

A number of core parameters are shared by the SIP and SIP LT content sets:

- Details of the offences that form the basis of both SIP and SIP LT profiles must be taken from information contained in licensed Factiva publications (although identifiers can be derived from reliable sources outside Factiva).
- Both content sets focus exclusively on criminal cases in which the individual profiled is a defendant in a formal legal process.

- Five crime categories are common to both content sets (Corruption, Financial Crime, Organised Crime, Trafficking and Tax Crime), with a financial threshold being the determining factor in whether a case should be SIP or SIP LT.

The key differences between the two content sets are as follows:

- SIP coverage is global while SIP LT coverage is not.
- Terror cases are only covered at SIP level.
- Presentation of content. SIP profiles contain notes that give a narrative summary of the case, while SIP LT profiles contain a Crime Details table that provides an indication of the value of the case plus links to the source articles.

3.4.3 Organised Crime Japan (OCJ)

Dow Jones enhanced its Watchlist content in January 2011 with the addition of profiles with the category Organised Crime Japan. This content, dating back to 1986, contains the names of those individuals and entities associated with organised crime groups in Japan.

These individuals and organised crime groups are often referred to as Anti-Social Forces. The organised crime groups are known as *bōryokudan* (or *yakuza*). Japanese regulations require banks and corporates to take appropriate precautions to ensure they are not dealing with individuals or entities that might be considered anti-social forces.

Those profiles qualifying for the Organised Crime Japan category are:

- Individuals named in Japanese and English news articles from licensed publications on Factiva as being involved in organised or yakuza-related crime (coverage back to 1986)
- Individuals and Entities from Sanction Lists related to organised crime in Japan
- Individuals and Entities from Other Official Lists related to organised crime in Japan
- Individuals and Entities from Other Exclusion Lists related to organised crime in Japan.

Sanction Lists are lists such as the United States Office of Foreign Assets Control (OFAC) Specially Designated National List.

Other Official Lists are lists such as the Japanese Designated Organized Criminal Syndicates List, the National Police Agency (Japan) Significant Wanted List and the most wanted and arrest lists from the police in each prefecture in Japan. Other Exclusion Lists are lists such as the MOD (Japan) Okinawa Defense Bureau Exclusion List, the Okinawa Prefectural Government (Japan) Exclusion List and the Fukuoka City Government (Japan) Exclusion List.

Coverage notes



The bulk of the Organised Crime Japan profiles are for individuals named in news articles from licensed publications on Factiva as being involved in organised or yakuza-related crime. In order to qualify for inclusion by Dow Jones, the individuals must be wanted, under investigation, arrested for, charged with or convicted of being involved in organised or yakuza-related crime or anti-social activity.

The crimes covered include extortion, gambling, prostitution, murder, kidnapping, battery or assault and possession of a gun or knife. The full list of crimes covered is derived from the Japanese National Police Agency's white papers on organised crime in which they describe the main crimes linked to gang crime.

4 State-Owned Companies (SOC)

State-Owned Companies, is an accurate, comprehensive and up-to-date resource to help financial institutions and multinational companies comply with global anti-bribery and anti-corruption regulations.

There are two main strands of content: State-Owned Companies (SOC) and the Board Members (BRD) linked to these entities.

Profile Type	Description
 SOC	State-Owned Company
 BRD	Board Member

4.1 State-Owned Companies (SOC)

Business organisations with a corporate structure for which the supra-national, national, regional, provincial or local government (including governmental departments and agencies as well as international organisations)

- Holds 1 percent or more of the issued shares in the enterprise
- Holds majority voting control (such as through a “golden share”) and thus has the power to veto shareholder decisions of the enterprise
- Has the power to appoint a majority of the members of the enterprise’s administrative, managerial or supervisory bodies

Corporations in every country around the world are researched to determine if they fit any of the coverage criteria. The aim is to identify for each country those that can be classified as State-Owned Companies.

In cases where it is unclear what percentage of issued shares the government owns, how much voting control it has or how many members of the enterprise’s administrative, managerial or supervisory body it can appoint, the public enterprise will be covered if reliable sources refer to the business organisation as owned by the government (supra-national, national, regional and local, including government departments and agencies).

Coverage includes those enterprises that meet any of the above conditions as of the start of 2008. If these conditions no longer apply or the company has ceased to exist, the company’s status will be changed to inactive, but the profile will not be removed.

State-Owned Companies may be owned by a single government or by multiple governments, and there may be current government ownership that differs from past ownership. The Current and Past Countries of Ownership are indicated on the company profile. A Country of Ownership may be different from the company’s Country of Registration or location(s).

Coverage notes

Subsidiaries: These are defined as entities that are at least 50% owned by a State-Owned Company. Coverage includes first-level and second-level subsidiaries. (Third-level subsidiaries, or subsidiaries of subsidiaries of subsidiaries, are not generally covered.)

Assets: Coverage extends to those entities that are 10%–49% owned by a State-Owned Company and these are labelled as Assets. Holdings of these Assets are not covered.

Branches: Coverage does not include separate profiles for every branch location for a State-Owned Company. For example, for a State-Owned hotel company, the company and its first and second-level subsidiaries are covered, but profiles are not created for every hotel location. Similarly, for a State-Owned bank profiles are not created for every branch office. An exception to this rule has been made for the branches of all directly sanctioned banks that are covered on Watchlist under Sanctions Control & Ownership.

Investment SOC: In the case of investment SOC, holdings are covered if the investment SOC owns at least 10% of the holding. An example of an investment SOC is a sovereign wealth fund (SWF.)

As a matter of practicality, schools, hospitals, museums, parks and similar small entities are not covered, even if they have a corporate structure. Government departments and ministries are not covered as these are deemed to be the government itself. Customers dealing with such entities should be aware that some sort of government involvement is likely.

4.1.1 Board Members (BRD)

Board members and senior executives are included for those State-Owned Companies that are directly majority owned by the national government, operate in a key industry at a national level and are not a subsidiary of another entity. All of these profiles are double-tagged as Politically Exposed Persons (PEP) and are also part of the Watchlist content set.

4.1.2 Close Associates/Related Entities of State-Owned Companies

The relationships that are used in State-Owned Companies are:

Parent Company/Subsidiary	For entities and their ultimate parent company only, which is defined as the last company in the chain where the ownership is more than 50 percent at each level.
Shareholder/Asset	For entities and their direct owner when the latter has an ownership stake of less than 50%.
Employee/Employer	For entities and their board members/senior executives.

5 Adverse Media

5.1 Adverse Media Entities (AME)

Profile Type	Description
 AM	Adverse Media - Entity

Dow Jones Risk & Compliance launched the Adverse Media Entities (AME) content set in August 2013.

AME focuses on companies with a corporate structure and commercial purpose that may have had adverse/negative media coverage on Regulatory, Competitive, Financial, Environmental, Production, Social and Labour related topics.

The content set provides coverage of material from licensed sources on Factiva starting from January 2012 and covers companies from every country in the world. Research is carried out in all languages covered by Factiva where there is relevant content.

Profiles include information on the company, including secondary identifiers; information on the category or categories to which the company has been linked in the news; a Government Action identifier and links to the Factiva article or articles. For the purposes of the Adverse Media Entities content set, Government Action is defined as a reported action involving a public authority or public body. Examples of Government Action are official announcements, investigations, rulings or decisions, criminal or civil court filings and proceedings, complaints filed with law enforcement bodies and police actions. An example of adverse media that does not fit the Government Action criteria is a report of alleged wrongdoing that does not involve a public authority or body.

Profiles will be created for all companies involved in a lawsuit or dispute. For example, if one company is sued by another, both defendant and plaintiff will be profiled. The exception to this is copyright or patent disputes, where only the defendants are covered.

THE ADVERSE MEDIA ENTITY CATEGORIES:

1. Regulatory

- Corruption Issues
- Fraud Issues
- Regulatory Issues
- Sanctions

2. Competitive/Financial

- Anti-Competitive Issues
- Association Risk
- Information Rights/Copyright/Patent Issues
- Financial Difficulty
- Management Issues
- Ownership Issues

3. Environment/Production

- Environmental Issues
- Product/Service Issues
- Production/Supply Chain Issues

4. Social/Labour

- Discrimination/Workforce Rights Issues
- Human Rights Issues
- Workforce Disputes
- Workplace Health/Safety Issues

The category definitions:

Regulatory	Definition
Corruption Issues	<p>Covers reports or allegations that those in a public position have abused that position or that they are involved in corrupt activities. Such cases might involve bribery, kickbacks or breach of trust. It also includes reported</p> <ul style="list-style-type: none"> • involvement in active bribery (which is the promising or giving of a financial or other advantage); • passive bribery (agreeing to receive or accepting a financial or other advantage); • bribery of public officials for the purpose of obtaining or keeping business; • failure of commercial organisations to prevent bribery by an associated person. <p>All of these are offences under the UK Bribery Act and/or U.S. Foreign Corrupt Practices Act (FCPA).</p> <p>Also covers reported laundering of funds derived from corruption, fixing of bids for public contracts or public bid irregularities resulting in fraud and extortion.</p> <p>Note: Only reported government investigations or criminal proceedings will be covered in this category.</p>
Fraud Issues	<p>Covers reports or allegations of fraud (internal or external), money laundering, market abuse such as insider dealing, manipulation of rates or indexes or prices, bid-rigging that doesn't involve a government body or government official, tax crime, false claims submitted to government programs and kickbacks paid to other companies and procurement fraud.</p>

Regulatory Issues	Covers reported investigations and fines/penalties imposed on a company by a government, professional, industrial or other regulatory body in connection with possible or actual breaches or violations of regulations. It also includes articles about settlements by companies linked to these regulations.
Sanctions	Covers reports of companies/entities that have breached sanctions or allegations suggesting they have breached sanctions/restrictions upon international trade or finance that a country or group of countries has imposed on another for political reasons. This includes those put in place against certain companies by the United Nations, European Union or Office of Foreign Asset Control.
Competitive/Financial	
Anti-Competitive Issues	Covers reports of monopolies, antitrust, restrictive practices and other competition issues; reports on companies being involved in practices that lead them to have a dominant or abusive impact on markets. It also includes news of regulator/court decisions connected to antitrust issues. For example, if a company merger or acquisition is rejected by regulators on antitrust grounds, or if the company challenges that decision.
Association Risk	Covers reported or alleged association with an individual or entity with a negative reputation which is damaging the company.
Information Rights/Copyright/Patent Issues	Covers reported disagreement over patents, copyright, intellectual property. It also includes allegations of theft of trade secrets, abuses of privacy law, libel, defamation, illegal posting on electronic media sites and other information-rights issues. Only defendants in copyright or patent disputes will be covered. Profiles will not be created for plaintiffs.
Financial Difficulty	Covers reported declarations of bankruptcy, insolvency and other severe funding/cashflow problems. Issues such as stock-price fluctuations are excluded.
Management Issues	Covers negative reports related to senior management changes or the failure of senior management to meet expectations. It includes negative news about management issues such as weak financial controls that have had an adverse impact on the company, lawsuits by senior management or former senior management against the company, or the dismissal or resignation of senior management in controversial circumstances.

Ownership Issues	Covers adverse media related to ownership changes, shareholder disputes, nationalisation/privatisation, initial public offerings.
Environment/Production	
Environmental Issues	Covers reported pollution, damage to ecosystems, damage to wildlife, damage/overuse of natural resources and controversial actions affecting the environment. Alleged company actions can be either wilfully or accidentally damaging or overexploiting natural resources. It includes lawsuits linked to environmental issues and governmental decisions related to environmental concerns that are described as negative for a company.
Product /Service Issues	<p>Covers reports of product recalls and bans; the failure of products or services; malpractice and professional negligence.</p> <p>It includes cybercrime issues such as data breaches, hacking, database break-ins, etc. that negatively affect a company's products/services.</p> <p>In general, issues related to the cancellation of products or services under development will be tagged Product/Service Issues.</p> <p>Issues related to production/supply of products/services are categorised Production/Supply Chain Issues.</p>
Production/Supply Chain Issues	<p>Covers reports of a sudden and severe threat to crucial functions that affects the short-term, and perhaps long-term, ability of the company to function.</p> <p>It includes news of potential, either temporary or lasting, disruption to the supply chain such as shortages of key components or materials for products or services, transport strikes affecting component/product deliveries, disruption of power supply, production issues such as factory shutdowns and issues around the failure of a company to provide products or services as required by agreements.</p>
Social/Labour Issues	
Discrimination/Workforce Rights Issues	Covers reports of discrimination against workers, clients, prospects or other entities. It includes workforce rights issues, child labour, forced labour and discrimination. It also covers alleged discriminatory practices that represent a business/reputational risk.
Human Rights Issues	Covers reports related to human rights issues such as genocide, rape, torture or war crimes. It also includes allegations of complicity in the commission of human rights abuse.



Workforce Disputes	Covers reported strikes, stoppages, disputes over collective bargaining agreements or disputes over representation on supervisory boards.
Workplace Health/Safety Issues	Covers reported issues, such as litigation, relating to death, injury, illness of employees (a single employee or more than one). It also includes reports of accidents that have just taken place, for example fires.

Consolidated profiles are offered for those entities that also meet the Watchlist and/or State-Owned Companies definitions.

6 Cities & Ports (Locations)

Profile Type	Description
 ECR	Enhanced Country Risk - Entity (Country)
 ECR	Enhanced Country Risk - Entity (Airport)
 ECR	Enhanced Country Risk - Entity (City)
 ECR	Enhanced Country Risk - Entity (Free Trade Zone)
 ECR	Enhanced Country Risk - Entity (Port)
 ECR	Enhanced Country Risk - Entity (Region)
 ECR	Enhanced Country Risk - Entity (Sub-Region)

Dow Jones provides structured reference data for regions, sub-regions, cities, seaports, airports and free trade zones in sanctioned countries either as a separate Cities & Ports feed or within RiskCenter under “Locations”. The data can help identify sanction risks and manage exceptions to compliance policy in the area of payment message filtering, trade finance, Anti-Money Laundering compliance and Know Your Client due diligence. Coverage includes variations of the place names in English, Chinese, French, German, Spanish, Japanese and the official language of the country.

Countries are included within this content set if they are sanctioned by at least two* of the following bodies:

- European Union (EU)
- United Nations (UN)
- United States Office of Foreign Assets Control (OFAC)


The specific Sanctions Programs are:

- EU Embargoes On Arms And Related Materiel
- OFAC – Country Sanction Programs
- UN Security Council Sanctions Committees Arms Embargoes

*As a result of client feedback, Cuba and Yemen are also covered. Both are part of the OFAC – Country Sanction Programs

*As a result of client feedback, Crimea, sanctioned by EU Embargoes on Arms and Related Materiel and OFAC – Country Sanction Programs, was added as a region to the coverage from March 2015. Please note that Russia was added owing to Russia’s relationship with Crimea. All other regions and points of entry in Russia, which is sanctioned by EU Embargoes on Arms and Related Materiel, have not been included.

Countries included: Belarus, Central African Republic, Côte d’Ivoire, Cuba, Democratic Republic of Congo, Eritrea, Iran, Iraq, Lebanon, Liberia, Libya, Myanmar, North Korea, Somalia, South Sudan, Sudan, Syria, Venezuela, Yemen, and Zimbabwe.



Crimea, Donetsk People's Republic, Luhansk People's Republic, Kherson and Zaporizhzhia are also included as standalone regions.

For up-to-date information on the content see FAQ [here](#).

7 Marijuana Related Businesses (MRB)

Profile Type	Description
 MRB	Marijuana Related Business - Entity

The Marijuana Related Businesses (MRB) content set covers licensed marijuana companies in the United States and Canada. For the states or provinces (and Washington, D.C. and Guam) where there is some form of marijuana legalisation and an official, publicly available list of licensees, Dow Jones covers names on those lists.

Marijuana legalisation can refer to medical or recreational marijuana legislation, or both. MRB covers entities with valid and active licences as of 1 October 2014.

Dow Jones monitors published lists of licensees on regulator websites and creates and updates profiles when licences are issued or changed.

News and specialist sites are monitored on votes to legalise marijuana, and new lists of licensees are added when that data becomes available.

Entities with licences having expired or been suspended prior to October 2014 are excluded from coverage. The profiles are made inactive if the entity no longer holds at least one active licence.

As of June 2023 the following states are covered:


Coverage in the U.S.

Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Hawaii, Illinois, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Montana, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Dakota, Texas, Utah, Vermont, Washington, West Virginia, Guam and Puerto Rico.

Coverage in Canada

Canada (federal level), Alberta, British Columbia, Manitoba, New Brunswick, Newfoundland and Labrador, Northwest Territories, Nova Scotia, Nunavut, Ontario, Prince Edward Island, Quebec, Saskatchewan and Yukon.

8 Money Services Businesses (MSB)

Profile Type	Description
 MSB	Money Services Business - Entity
 MSB	Money Services Business - Person

The Money Services Businesses (MSB) content set covers entities and individuals that are licensed providers of money transfer services, including currency exchange, cheque cashing and issuing, cashing or selling money orders, virtual currency dealers and digital payment token services*. Coverage includes MSB in Canada, Hong Kong, Malaysia, the Philippines, Singapore, and the United States. Profiles are created based on lists made publicly available in these countries.

MSB coverage extends to licensed or registered entities and individuals that appear on a public list and, in most cases, have a unique licence number or company identification number. Please note that Malaysia, Singapore and the Philippines do not provide licence numbers.

MSB covers entities and individuals with valid and active licences as of 1 January 2018, except for the Philippines, for which the coverage started on 1 September 2020. Entities and individuals with licences having expired or been suspended prior to that date are excluded from coverage. The profiles are made inactive if the entity no longer holds at least one active licence.

MSB focuses on providing information from the regulating bodies. This information is structured for ease of use.

Countries covered and the source of information:

- Canada (FINTRAC)
- Hong Kong (Customs and Excise Department)
- Malaysia (Central Bank of Malaysia)
- Philippines (Central Bank of the Philippines)
- Singapore (Monetary Authority of Singapore)
- United States (FinCEN)

*Virtual currency dealers are included for Canada and digital payment token services for Singapore.

9 Appendix 1 – Extent of Coverage

Summary of coverage start dates and extent of archive:



























Content	Date first included	Extent of archive
Politically Exposed Persons (PEP)	2001	January 2001*
Sanctions and Other Official Lists	2002	Varies according to the list**
Other Exclusion Lists (OEL)	2013	Varies according to the list
Special Interest Persons (SIP)	2006	January 2000
Special Interest Persons – Lower Threshold (SIP LT) United States	2014	January 2000
Special Interest Persons – Lower Threshold (SIP LT) Canada	2014	September 2013
Special Interest Persons – Lower Threshold (SIP LT) Asia	2014	January 2008
Organised Crime Japan	2011	January 1986
State-Owned Companies (SOC)	2008	January 2008
Adverse Media Entities (AME)	2013	January 2012
Sanctions Control & Ownership (SCO)	2015	January 2015

*People who have held senior political roles at any time since January 2001 and people who have held a Head of State role at any time since January 1975 are included. These profiles will include any PEP roles held before 2001, if any.













Roles that fall within the Additional Domestic Screening Requirement (ADSR) are only added to the profiles if they were held at any time since the corresponding AML regulation establishing these roles as politically exposed entered into force.

**First lists were added in 2002, since then new sanctions and other official lists have been added every year. The extent of the archive varies per list.

10 Appendix 2 – Description of Active/Inactive Status

Content in Dow Jones Risk & Compliance profiles is tagged as either Active or Inactive depending on the following criteria ³ :		
	Politically Exposed Persons (PEP) with a current Primary Occupation	Active
	PEPs with no current Primary Occupation (those with See Previous Roles in the Occupation Title field) or deceased PEPs	Inactive
             	Profiles categorised as Sanctions Lists, Other Official Lists or Other Exclusion Lists that have at least one active List Reference (i.e. at least one List Reference does not have a To date)	Active
 	All Special Interest Person (SIP) profiles, as defined in section 3.4	Active
         	Profiles categorised as Sanctions Lists, Other Official Lists or Other Exclusion Lists that have no current listing (i.e. all List References have a To date)	Inactive
	Enhanced Country Risk (ECR) – vessels that are associated with at least one comprehensively sanctioned country	Active

³ The mentioned criteria apply to profiles with one content type. In cases of profiles with multiple content types, each content type will be tagged with the applicable status within the profile.

	Sanctions Control & Ownership (SCO) entities where any control or ownership by sanctioned subjects is current	Active
	Sanctions Control & Ownership (SCO) entities where all control or ownership by sanctioned subjects has ceased, where the company has ceased to exist or where the sanctions have been lifted	Inactive
	All Relatives or Close Associates (RCA) attached to at least one Active parent profile (e.g. an Active PEP), unless deceased	Active
	Deceased Relatives or Close Associates (RCA) and all other RCAs attached only to Inactive parent profiles	Inactive
	State-Owned Companies (SOC) with either Voting Control, or Board Appointing Control or current Government Ownership	Active
	State-Owned Companies (SOC) that have ceased operations or those with no current Government Ownership and no Voting Control and no Board Appointing Control	Inactive
	Adverse Media Entities (AME) with at least one active Adverse Media issue	Active
	Adverse Media Entities (AME) that have ceased operations	Inactive
	Profiles of Marijuana Related Businesses (MRB) with at least one active licence	Active
	Profiles of Marijuana Related Businesses (MRB) with no active licence (i.e. all licences are expired or suspended)	Inactive
	Profiles of Money Services Businesses (MSB) with at least one active licence	Active
	Profiles of Money Services Businesses (MSB) with no active licence (i.e. all licences are expired or suspended)	Inactive



About Dow Jones

Dow Jones is a global provider of news and business information, delivering content to consumers and organisations around the world across multiple formats, including print, digital, mobile and live events. Dow Jones has produced unrivaled quality content for more than 130 years and today has one of the world's largest news-gathering operations globally. It is home to leading publications and products including the flagship Wall Street Journal, America's largest newspaper by paid circulation; Barron's, MarketWatch, Mansion Global, Financial News, Investor's Business Daily, Factiva, Dow Jones Risk & Compliance, Dow Jones Newswires, OPIS and Chemical Market Analytics. Dow Jones is a division of News Corp (Nasdaq: NWS, NWSA; ASX: NWS, NWSLV).

About Dow Jones Risk & Compliance

Dow Jones Risk & Compliance is a global provider of regulatory compliance and risk management solutions covering financial crime, third-party risk management, sanctions and international trade. Offering best-in-class screening data, trusted due diligence, and innovative technology platforms, we help organisations manage regulatory and reputational risks efficiently and effectively.

Find out more at: www.dowjones.com/professional/risk