COUNTERPARTY AML AND KYC DUE DILIGENCE REPORT

AML / KYC

AML / KYC Due Diligence

ISSUE	ENGAGEMENT 00
CADENCE	PER ENGAGEMENT
HANDLING	CLIENT CONFIDENTIAL

BOTTOM LINE UP FRONT

Counterparty C, a logistics group proposed as a joint venture partner in the UAE, is legitimately trading, but its ownership runs through two nominee layers. One ultimate beneficial owner has a close relative named in a regional sanctions action. Enhanced review is required.

7
ENTITIES IN OWNERSHIP CHAIN

3
BENEFICIAL OWNERS IDENTIFIED

1.4K
SANCTIONS AND PEP LIST HITS

COUNTERPARTY RISK SCORE

4 / 5

HIGH

LOW — CRITICAL

Scored on TAM-C's 1 to 5 risk method. Driven by opaque ownership and an indirect sanctions link.

01 Key findings

OWNERSHIP — HIGH

Ownership hidden behind nominees

Counterparty C is held by [redacted] Ltd in the BVI, itself owned by a nominee firm in Cyprus. Filings and trust records point to three beneficial owners, one of whom was never disclosed.

SOURCE · CORPORATE REGISTRIES

SANCTIONS — HIGH

Owner's relative on a sanctions list

The undisclosed owner is the brother of [redacted], named in a 2025 regional sanctions action. No direct sanctions apply to the counterparty, but the link raises secondary exposure for the client.

SOURCE · SANCTIONS LISTS

ADVERSE MEDIA — MODERATE

Past customs dispute resolved

Regional press reported a 2021 customs dispute over misdeclared cargo at Jebel Ali. The [redacted] case closed with a fine and no charges. No money laundering allegations were found in any source.

SOURCE · REGIONAL PRESS

02 Due diligence risk factors

FACTOR	TREND	EXPOSURE
Beneficial ownership transparency	▼ Easing	HIGH
Sanctions and PEP proximity	▲ Rising	HIGH
High-risk jurisdiction routing	■ Steady	ELEVATED
Adverse media and litigation	■ Steady	MODERATE

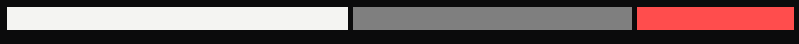
03 Analyst recommendations

01 Request certified ownership documents for every layer before signing any agreement.

02 Seek legal advice on secondary sanctions exposure tied to the undisclosed owner.

03 Add sanctions and change-of-control clauses to the joint venture agreement.

SOURCE MIX THIS ENGAGEMENT



Registries 44% · Watchlists 36% · Media 20%

WHAT THE CLIENT RECEIVES

→ Analyst-written due diligence report

→ Full ownership chart to the UBOs

→ Sanctions, PEP and media screening

→ Risk score with clear next steps

ILLUSTRATIVE SAMPLE. ENTITIES, PERSONS AND FIGURES ARE ANONYMIZED OR REDACTED. FULL REPORTS ARE DELIVERED TO CLIENTS ONLY.

OPERATIONS@TAMCINTEL.COM · +1.202.922.0068