



How to conduct sanctions screening?

Presentation by FIU Compliance

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Targeted Financial Sanctions (TFS) Screening

- TFS are sanctions imposed through United Nations Security Council Resolutions (UNSCRs) against specific individuals and entities identified by the UN Security Council (or relevant UN committees) as contributing to a particular threat to, or breach of, international peace and security.
- As a member state of the UN, and further to Recommendation 6 and 7 of the FATF, Mauritius has committed to implement the UNSCRs via legislation, namely The United Nations (Financial Prohibitions, Arms Embargo, and Travel Ban) Sanctions Act 2019 ('the **UN Sanctions Act**').
- TFS includes frozen assets of the specific individuals and entities identified in the UNSCRs, but also prohibitions on making funds or other assets available to them.

What is TFS Screening?

- Screening is defined as the comparison of one string of text against another to detect similarities which would suggest a potential match.
- As per clause 43 of the Guidelines on the implementation of TFS under the UN Sanctions Act ([‘UN Sanctions Act Guidelines’](#)) reporting persons are required to screen their clients against the United Nations Security Council Consolidated List ([UNSC Consolidated List](#)).



Ensuring Compliance with the UN Sanctions Act

- The FIU supervises and enforces compliance by its supervised reporting persons with the UN Sanctions Act 2019 ('the **Act**'), during offsite monitoring and onsite inspections.
- Reporting Persons are required to implement internal controls and other procedures to enable them to effectively comply with the Act. The FIU monitors and check the controls and procedures put in place by its regulates to ensure compliance with the Act.
- The FIU has also produced a [video presentation](#) which explains the main provisions of the Act and the obligations of the reporting persons.



What is expected from a reporting person?

- Have internal controls to screen the UNSC Consolidated List.
- Take immediate action with respect to any changes brought thereto.
- Regularly consult the newspapers for any notice which may be issued by the National Sanctions Secretariat (NSS) and goAML FIU Notifications and immediately act upon it.
- Immediately (i.e. without delay and not later than 24 hours), verify whether the details of the Listed Party match with the particulars of any of its customer.
- If there is a positive match, identify whether the customer owns any funds or other assets with it, including the funds or assets mentioned in section 23(1) of the Act and **report** to the NSS, its supervisory authority its supervisory authority [FIU Compliance] and the FIU (Intelligence) pursuant to section 14 of the FIAMLA (file STR).



When to Screen?

- On customer on-boarding.
- Throughout the life cycle of the customer relationship. This also includes directors and beneficial owners of corporate customers or legal arrangements.
- At regular intervals either upon a trigger event (change in directors or ownership) or when a sanctions list changes.



➤ Where to find the UNSC Consolidated List?

➤ [National Sanctions Secretariat website \(NSS\)](#)

➤ [FIU website](#)



➤ [United Nations Security Council website](#)



UNITED NATIONS SECURITY COUNCIL



Steps to follow to manually screen against the UNSC Consolidated List ?

Step 1 - Open the UNSC Consolidated List.

Step 2 - Search ('screen') your client for a match on the UNSC Consolidated List.

Step 3 - Keep record of the screening done & the results

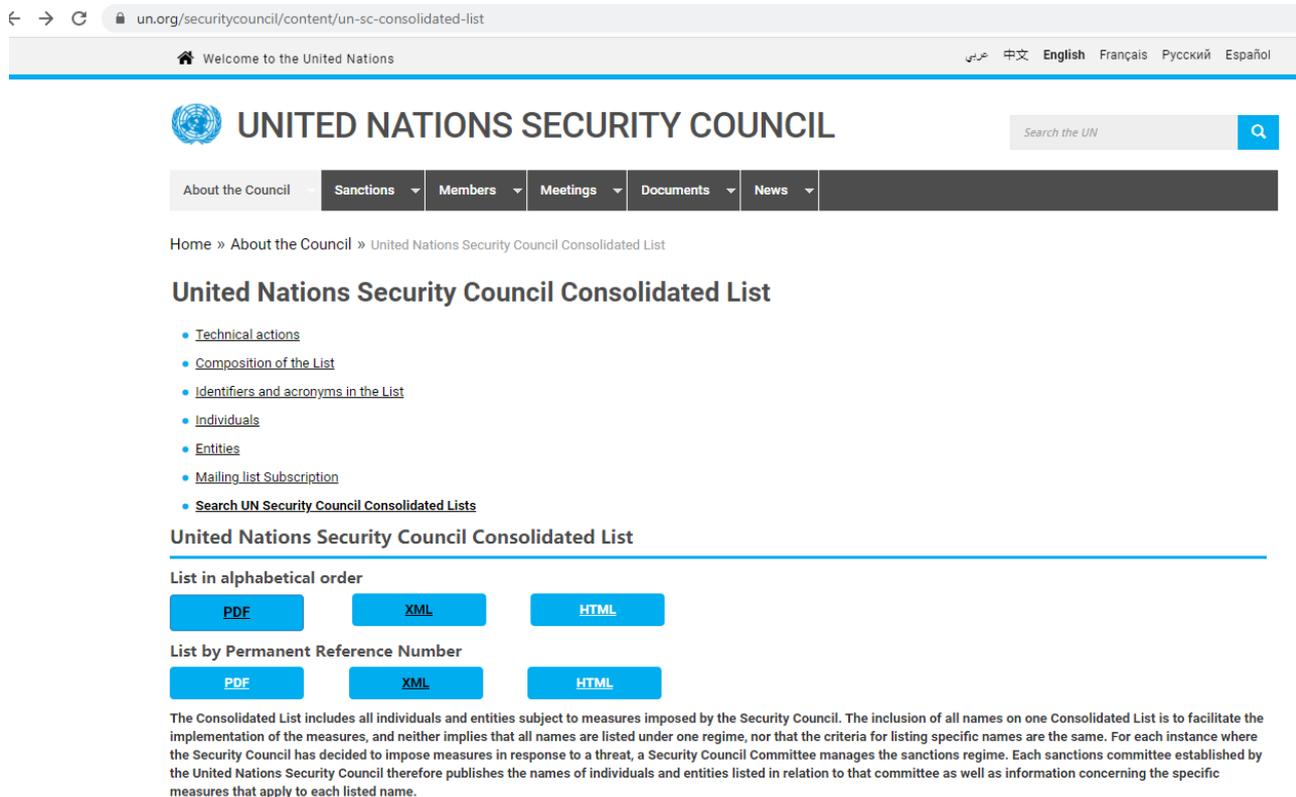
Step 4 - If match found, proceed with reporting to NSS & FIU



Step 1 - Open the UNSC Consolidated List

(a) Access the UNSC Consolidated list webpage on the link:

[\[https://www.un.org/securitycouncil/content/un-sc-consolidated-list\]](https://www.un.org/securitycouncil/content/un-sc-consolidated-list)

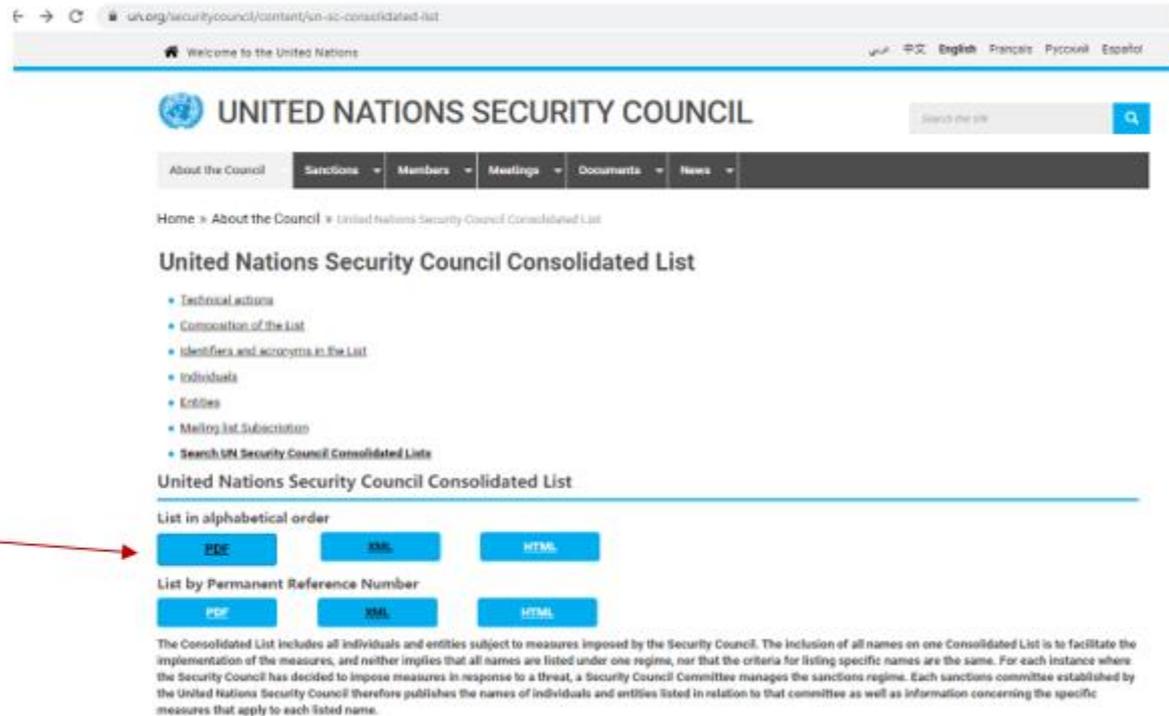


The screenshot shows the United Nations Security Council website. The browser address bar displays the URL: [un.org/securitycouncil/content/un-sc-consolidated-list](https://www.un.org/securitycouncil/content/un-sc-consolidated-list). The page header includes the United Nations logo and the text "UNITED NATIONS SECURITY COUNCIL". A search bar is visible with the placeholder text "Search the UN". The main navigation menu includes "About the Council", "Sanctions", "Members", "Meetings", "Documents", and "News". The breadcrumb trail reads: "Home » About the Council » United Nations Security Council Consolidated List". The page title is "United Nations Security Council Consolidated List". A list of links is provided: [Technical actions](#), [Composition of the List](#), [Identifiers and acronyms in the List](#), [Individuals](#), [Entities](#), [Mailing list Subscription](#), and [Search UN Security Council Consolidated Lists](#). Below this, the section "United Nations Security Council Consolidated List" is displayed. Under the heading "List in alphabetical order", there are three buttons: "PDF", "XML", and "HTML". Under the heading "List by Permanent Reference Number", there are also three buttons: "PDF", "XML", and "HTML". At the bottom, a paragraph explains: "The Consolidated List includes all individuals and entities subject to measures imposed by the Security Council. The inclusion of all names on one Consolidated List is to facilitate the implementation of the measures, and neither implies that all names are listed under one regime, nor that the criteria for listing specific names are the same. For each instance where the Security Council has decided to impose measures in response to a threat, a Security Council Committee manages the sanctions regime. Each sanctions committee established by the United Nations Security Council therefore publishes the names of individuals and entities listed in relation to that committee as well as information concerning the specific measures that apply to each listed name."



Step 1 - Open the UNSC Consolidated List

(b) Select the PDF version as indicated by the arrow below to access the UNSC Consolidated list.



UN.org/securitycouncil/content/un-sc-consolidated-list

Welcome to the United Nations

English Français Русский Español

UNITED NATIONS SECURITY COUNCIL

About the Council | Sanctions | Members | Meetings | Documents | News

Home » About the Council » United Nations Security Council Consolidated List

United Nations Security Council Consolidated List

- Technical actions
- Composition of the List
- Identifiers and acronyms in the List
- Individuals
- Entities
- Meeting List Substitution
- Search UN Security Council Consolidated Lists

United Nations Security Council Consolidated List

List in alphabetical order

PDF XML HTML

List by Permanent Reference Number

PDF XML HTML

The Consolidated List includes all individuals and entities subject to measures imposed by the Security Council. The inclusion of all names on one Consolidated List is to facilitate the implementation of the measures, and neither implies that all names are listed under one regime, nor that the criteria for listing specific names are the same. For each instance where the Security Council has decided to impose measures in response to a threat, a Security Council Committee manages the sanctions regime. Each sanctions committee established by the United Nations Security Council therefore publishes the names of individuals and entities listed in relation to that committee as well as information concerning the specific measures that apply to each listed name.

PDF version of
the UN
Consolidated
list

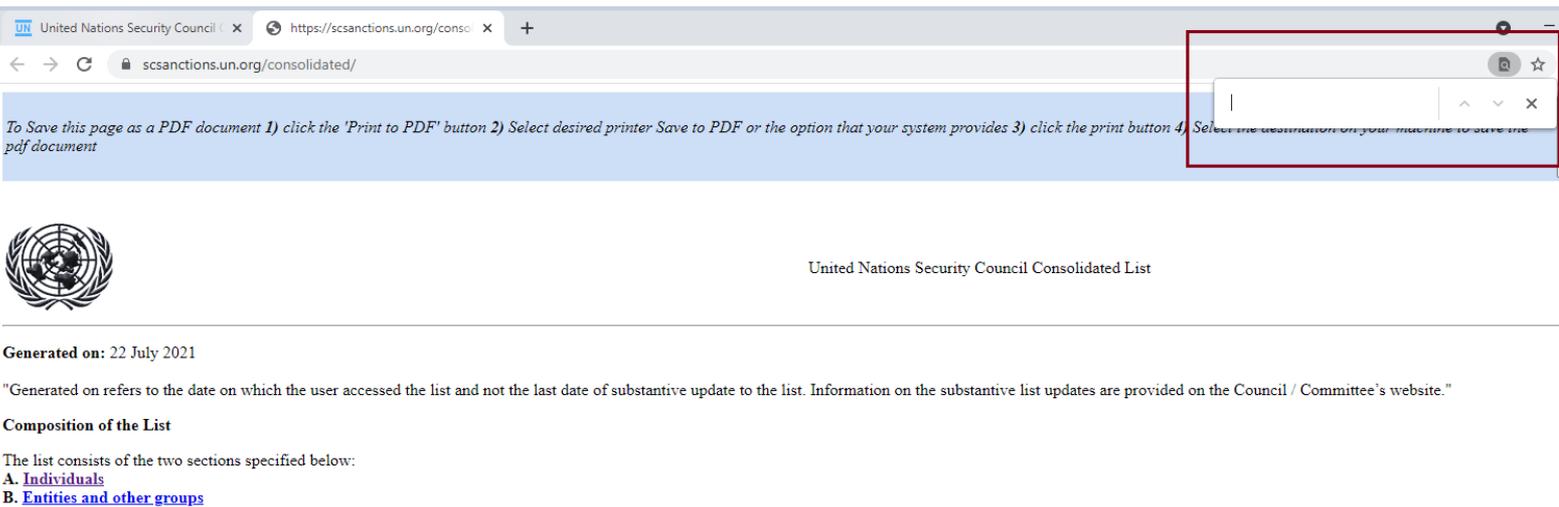


Step 2 - Screen the UNSC Consolidated List

(a) Once the list is open, on your keyboard, press Ctr



to open the Find field.



United Nations Security Council Consolidated List

Generated on: 22 July 2021

"Generated on refers to the date on which the user accessed the list and not the last date of substantive update to the list. Information on the substantive list updates are provided on the Council / Committee's website."

Composition of the List

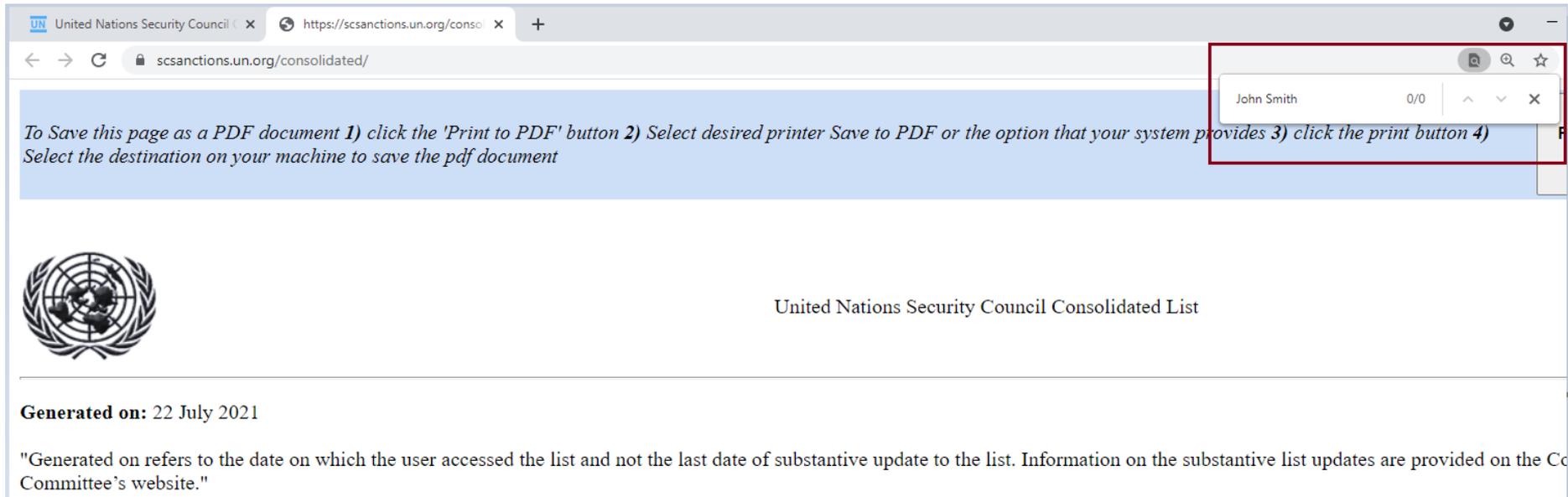
The list consists of the two sections specified below:

- A. [Individuals](#)
- B. [Entities and other groups](#)



Step 2 - Screen the UNSC Consolidated List

(b) Type your search name (client name, for example John Smith) in the Find field.



United Nations Security Council Consolidated List

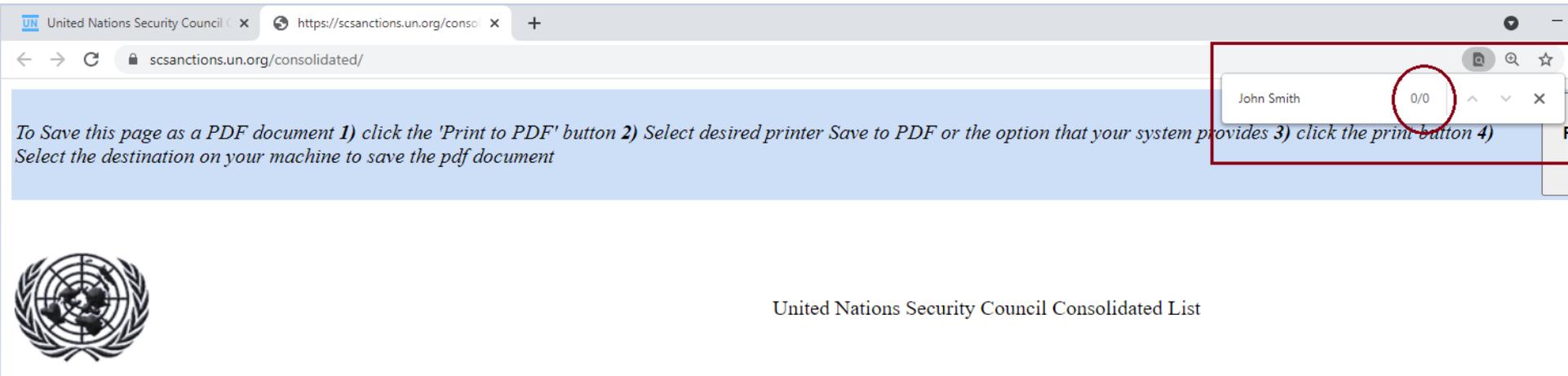
Generated on: 22 July 2021

"Generated on refers to the date on which the user accessed the list and not the last date of substantive update to the list. Information on the substantive list updates are provided on the CoC website."



Step 2 - Screen the UNSC Consolidated List

(c) The screening results will be indicated in the Find field as below:



The screenshot shows a web browser window with the URL <https://scsanctions.un.org/consolidated/>. The search results for 'John Smith' are displayed as '0/0'. A red box highlights the search input field containing 'John Smith' and the result count '0/0'. Below the search results, there is a blue banner with instructions: 'To Save this page as a PDF document 1) click the 'Print to PDF' button 2) Select desired printer Save to PDF or the option that your system provides 3) click the print button 4) Select the destination on your machine to save the pdf document'. The United Nations logo is visible in the bottom left corner, and the text 'United Nations Security Council Consolidated List' is centered at the bottom.

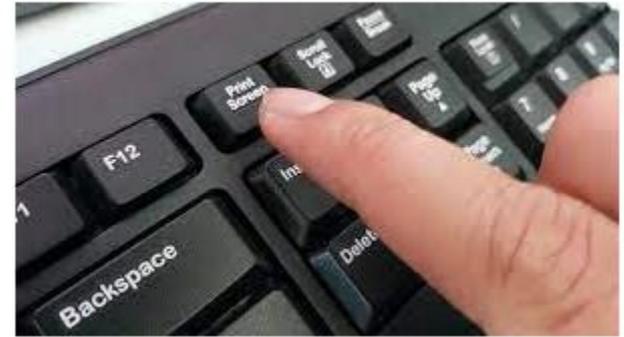
- The screening results above show no match to the UNSC Consolidated list i.e 0 results.



Step 3 - Keep record of the TFS screening

**(a) Take a screenshot of your screen
Or 'Printscreen' shown in the visual.**

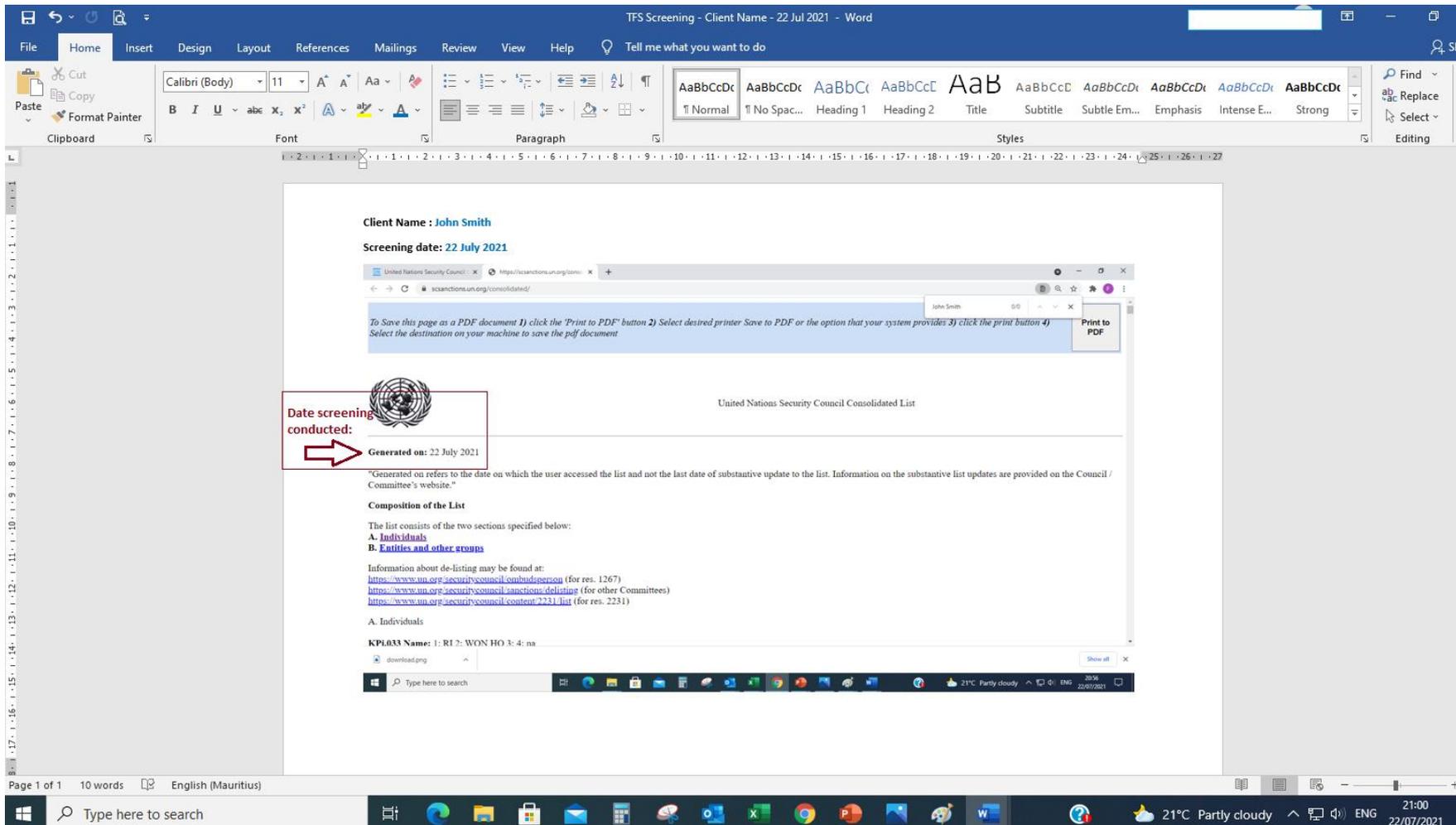
(b) Save the screenshot Or



**Paste the Printscreen on a word document.
(see example at next page)**

you may save it electronically or in hard copy as per your record keeping policy as part of client CDD records.

Step 3 - Keep record of the TFS screening



TFS Screening - Client Name - 22 Jul 2021 - Word

File Home Insert Design Layout References Mailings Review View Help Tell me what you want to do

Clipboard Font Paragraph Styles Editing

Client Name : **John Smith**

Screening date: **22 July 2021**

United Nations Security Council Consolidated List

Date screening conducted:  **Generated on: 22 July 2021**

United Nations Security Council Consolidated List

Generated on refers to the date on which the user accessed the list and not the last date of substantive update to the list. Information on the substantive list updates are provided on the Council / Committee's website.

Composition of the List

The list consists of the two sections specified below:

A. Individuals

B. Entities and other groups

Information about de-listing may be found at:

<https://www.un.org/securitycouncil/ombudsperson> (for res. 1267)

<https://www.un.org/securitycouncil/sanctions/delisting> (for other Committees)

<https://www.un.org/securitycouncil/content/2231-list> (for res. 2231)

A. Individuals

KPL033 Name: 1: RI 2: WON HO 3: 4: na

download.png

Page 1 of 1 10 words English (Mauritius)

Type here to search 21°C Partly cloudy 21:00 22/07/2021



Step 4 - If match found, proceed with reporting to NSS & FIU

If the client's name appears on the UNSC Consolidated list, it implies that the client is a true match.

- When a true match with a listed/designated person is identified by a reporting person, it should be reported immediately to the NSS and the FIU.
- The report is submitted using the Template for Reporting on Positive Match under section 25(2) of the United Sanctions Act available on the NSS website.



THANK YOU

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