

Investec Bank (Channel Islands) Limited (IBCI)
Sensitive Country and Sensitive Business
Activity List



Important Notes: If you wish to open a new designated account with us where the underlying client or entity could be considered to be **high risk** by way of either **business activity, geographical location, politically exposed, commercially exposed or high profile or if you are aware of any derogatory information surrounding the client/entity** then we will require you to discuss these circumstances with us before requesting us to open the account. Charges may apply to any business with links to the below countries or activities.

Sensitive High Countries which require Management Approval – Business Acceptance Forum (BAF)

– Contact your Relationship Manager (RM) to discuss prior to sending the documentation to us

Any link to countries listed below are required to be presented to our BAF for prior approval and consideration of any charges. Due to the high risk nature of these countries we request that in all circumstances full Enhanced Due Diligence (EDD) is provided to us including ALL associated individuals or entities within the structure. EDD requirements may include items such as verification of Source of Wealth, CVs, as well as personal documents and constitutional documentation.

Afghanistan	Chad	Haiti	Mozambique	Syria
Algeria	Colombia	Honduras	Myanmar	Trinidad and Tobago
Angola	Congo Republic	Indonesia	Nicaragua	Tunisia
Azerbaijan	Cuba	Iran	Nigeria	Turkey
Bahamas	Democratic Republic	Iraq	North Korea (DPRK)	Turkmenistan
Bangladesh	of the Congo	Ivory Coast	Pakistan	Uganda
Belarus	Ecuador	Laos	Panama	Ukraine
Bolivia	Egypt	Lebanon	Papua New Guinea	Uzbekistan
Bosnia and Herzegovina	Equatorial Guinea	Liberia	Russia	Vanuatu
Botswana	Eritrea	Libya	Senegal	Venezuela
Burundi	Ethiopia	Maldives	Sierra Leone	Yemen
Cambodia	Ghana	Mali	Somalia	Zimbabwe
Cameroon	Guinea	Mauritania	South Sudan	
Cape Verde	Guinea-Bissau	Mexico	Sri Lanka	
Central African Republic	Guyana	Morocco	Sudan (North)	

Politically Exposed Persons (PEP) and High Profile Individual (HPI)/Commercially Exposed Persons (CEP)

– Contact your RM to discuss prior to sending the documentation to us

PEP linked entities are required to be presented to our BAF. Due to the high risk nature of these accounts we request that in all circumstances full EDD is provided as stated above. Depending on the circumstances an independent private investigation report may also be requested.

HPI/CEPs do not normally need to be presented to the BAF – this is done on a case by case basis. We request that in all circumstances full EDD is provided as stated above.

High Risk – Contact your RM to discuss prior to documentation being sent

Aland Islands	Cocos (Keeling) Islands	Kazakhstan	Northern Mariana Islands	St Lucia
Albania	Comoros	Kenya	Oman	Suriname
American Samoa	Cook Islands	Kosovo	Palau	Svalbard and Jan Mayen
Andorra	Costa Rica	Kuwait	Palestine	eSwatini
Anguilla	Curacao (Dutch)	Kyrgyzstan	Paraguay	Tajikistan
Antigua and Barbuda	Cyprus	Lesotho	Peru	Tanzania
Argentina	Djibouti	Liechtenstein	Phillippines	Thailand
Armenia	Dominica	Macau	Pitcairn	Timor-Leste
Aruba (Dutch)	Dominican Republic	Madagascar	Qatar	Togo
Barbados	El Salvador	Malawi	Rwanda	Tokelau
Belize	Falkland Islands	Malaysia	Saint Barthélemy	Tonga
Benin	Faroe Islands	Malta	Saint Pierre and	Turks and Caicos
Bermuda	Fiji	Marshall Islands	Miquelon (French)	Tuvalu
Bonaire, Sint Eustatius and Saba (Dutch)	French Polynesia (French)	Micronesia	Samoa	United Arab Emirates
Bouvet Island	Gabon	Moldova	San Marino	United States Minor
Brazil	Gambia	Monaco	Sao Tome and Principe	Outlying Islands
British Indian Ocean Territory	Greenland	Mongolia	Saudi Arabia	US Virgin Islands
British Virgin Islands	Grenada	Montserrat	Serbia	Vietnam
Brunei	Guam	Namibia	Seychelles	Wallis and Futuna
Burkina Faso	Guatemala	Nauru	Sint Maarten (Dutch)	(French)
Cayman Islands	Heard Island and	Nepal	Sint Maarten (French)	Western Sahara
China	McDonald Islands	New Caledonia (French)	Solomon Islands	Zambia
Christmas Island	Holy See (Vatican)	Niger	St Helena, Ascension and Tristan da Cunha	
	India	Niue		
	Jamaica	Norfolk Island		

High Risk Business Activities List

– Any association with these activities contact your RM prior to sending the documentation to us

Activities where IBCI has no appetite for business

- Armaments, munitions, ordnance business, military equipment and defence (goods, technology, personnel & training) indirectly or directly;
- Bearer share ownership structures indirectly or directly;
- Charities (Non UK, Channel Islands or Isle of Man);
- Payroll companies – stand alone (not through a trust);
- Pornography/red light business;
- Payments/Clients involving Virtual currencies – e.g. Bitcoin.

High Risk Occupations/Business Activities – Contact your RM prior to sending the documentation to us

- Art/Antique dealers/Auctioneers;
- Car, Truck, boat/shipping, bus and plane dealerships or operators and machine parts manufacturers;
- Cash-intensive businesses, convenience stores, restaurants, retail stores, parking garages, bars, taxi firms, fast food outlets etc.;
- Casinos/betting companies and internet gambling companies – on a case by case basis;
- Charities (UK, Channel Islands or Isle of Man);
- Crowdfunding;
- Dealing in luxury vehicles such as cars, ships, helicopters and planes;
- Import/export companies, particularly dealing in high value goods, technology and pharmaceuticals;
- Infrastructure construction, particularly projects funded by government but including privately funded infrastructure construction;
- Manufacture, marketing or sale of pharmaceutical goods or devices (not licensed or have not received marketing authorisation in the jurisdiction where they are manufactured, marketed, sold or supplied);
- Mining and natural resource extraction – including dealing, drilling, quarrying (i.e. precious stones, metals, oil and gas) and dealers that purchase metals from pawnbrokers/other secondary sources;
- Money changers and remittance services, travel agents (particularly unbonded), pawn brokers;
- Payments/Clients involving currency exchanges, casas de cambio, internet payment processors, e-money issuers;
- Payments/Clients involving embassies, consulates and diplomatic missions;
- Payments/Clients related to penny stocks or microcap securities;
- Provision of public utilities including the infrastructure for a public service (controlled by government) e.g. water, sewage, electricity;
- Trading Companies which are active (in particular container leasing, time share activities, sale or leasing of overseas property development);
- Wholesalers and retailers of consumer electronics, especially mobile phones.

This list is not exhaustive, please contact your RM with any queries.

Documentation which could be requested (examples)

Income from employments (i.e wages, bonus)	<ul style="list-style-type: none">· An original or certified copy of a recent pay slip· Written confirmation of annual salary signed by employer
Property Sale	<ul style="list-style-type: none">· Original or certified copy of contract of sale· Written confirmation of sale signed by advocate/solicitor
Sale of Investment	<ul style="list-style-type: none">· Original or certified copy of contract note· Written confirmation of sale/holding signed by accountant/broker
Inheritance	<ul style="list-style-type: none">· Original or certified copy of Will or Grant of Probate· Written confirmation of inheritance signed by advocate/solicitor/trustee/executor
Company Sale	<ul style="list-style-type: none">· Original or certified copy of contract of sale· Written confirmation of sale signed by advocate/solicitor/accountant
Divorce Settlement	<ul style="list-style-type: none">· Original or certified copy of court order· Written confirmation of settlement signed by advocate/solicitor
Savings	<ul style="list-style-type: none">· Statement from savings institution and enquiry of the source of wealth
Lottery/Gambling win	<ul style="list-style-type: none">· Evidence from the lottery company· Cheque· Winnings receipt

Other documents which could be requested for High Risk cases

Private Investigation report
Curriculum Vitae – career, experience and knowledge
Verification documentation on certifiers – status etc
Audited Company Accounts

Original certifications must meet the current certification standards – capable of verification: name, address, qualification, date, etc.

Banking | Lending

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