

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

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

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, ordinance 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.

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