

# Sigma360 Indicators

**Sigma360's Proprietary Indicators** are a unit of risk or information of interest from a compliance perspective. The indicators are generated when a search is performed and are classified into categories and sub-categories to aid filtering and monitoring. The categories are organized as follows:

## **Sanctions (SAN)**

An entity listed on a sanctions watchlist. Available as both direct as well as association risk. See page 2 for more details.

## **PEP (PEP)**

Politically Exposed Person, current and former, organized into 3 levels. Available as both direct as well as association risk. See page 3 for more details.

## **State Owned Entity (SOE)**

An entity whose shareholders are a public authority, state, or government. Available as both direct as well as association risk. See page 3 for more details.

## **Enforcement Action (ENF)**

Any hit on a legal, regulatory or enforcement action list. Available as both direct as well as association risk. See page 4 for more details.

## **Restricted Entity (RST)**

Entities on special lists published by governments that may denote indirect nexus with sanctioned entities or other enforced trade restriction. Available as both direct as well as association risk. See page 7 for more details.

## **Association Risk (ASR)**

Any direct or indirect relationships with oligarchs. See page 7 for more details.

## **Jurisdiction (JUR)**

Four levels of risk classification based on Sigma's proprietary country risk model. Available as both direct as well as association risk. See page 7 for more details.

## **Registration Status (STA)**

Information about an entity's status with a corporate registry, regulator, or reputable task force. See page 7 for more details.

## **Transparency (TRN)**

Any risk related to bearer shareholder and the Offshore Leaks database. See page 6 for more details.

## **Address (ADD)**

Known shell company, bearer shares, virtual office, corporate service provider or a sanctioned entity addresses. See page 6 for more details.

## **News Media (MED)**

News articles and events identified by Sigma's News, a mass media screening solution. See page 5 for more details.

## **Network Risk (SAN PEP RST ENF SOE)**

SAN & PEP risk from any direct relationship or up to 5 hops in family and ownership chains. RST, ENF and SOE limited to family and ownership relationships 1-5 hops.

# Sanctions (SAN)

Sigma360's data sources cover **sanctions programs from 61 jurisdictions**, including key intergovernmental agencies such as the United Nations. These sanctions lists are obtained via direct integration and 3rd party data partnerships.

More details on coverage, including lists of covered regulatory bodies and sanctions programs, can be provided via our data dictionary which is shared under NDA.

Sigma360 includes two sub-categories for sanctions indicators using sub-categories:

1. Information on both current and past sanctions with clear delineation between them (e.g., whether a name is listed or de-listed)
2. Identify any entities that are owned, directly or indirectly, individually or in the aggregate, 50% or more by one or more blocked persons (the OFAC 50 rule).

## Tier-1 Sub-category Jurisdictions

- |                                  |                   |   |
|----------------------------------|-------------------|---|
| 1. UK (HM Treasury)              | 5. Japan          | 9. United States of America (All OFAC programs, Dept. of Commerce, & State Dept.) |
| 2. Australia (Consolidated)      | 6. Singapore      |   |
| 3. Canada (Consolidated)         | 7. Switzerland    |   |
| 4. European Union (all programs) | 8. United Nations |   |

## Tier-2 or Other Sub-category Jurisdictions

- |               |                |                 |                          |
|---------------|----------------|-----------------|--------------------------|
| 1. Algeria    | 14. Germany    | 27. Lithuania   | 40. Romania              |
| 2. Argentina  | 15. Greece     | 28. Malaysia    | 41. Russia               |
| 3. Armenia    | 16. India      | 29. Malta       | 42. Spain                |
| 4. Azerbaijan | 17. Indonesia  | 30. Mexico      | 43. Sri Lanka            |
| 5. Bahrain    | 18. Iran       | 31. Moldova     | 44. Sweden               |
| 6. Bangladesh | 19. Ireland    | 32. Monaco      | 45. Tajikistan           |
| 7. Belgium    | 20. Israel     | 33. Netherlands | 46. Thailand             |
| 8. Brazil     | 21. Italy      | 34. New Zealand | 47. Tunisia              |
| 9. Bulgaria   | 22. Jordan     | 35. Pakistan    | 48. Turkey               |
| 10. China     | 23. Kazakhstan | 36. Panama      | 49. Ukraine              |
| 11. Egypt     | 24. Kyrgyzstan | 37. Philippines | 50. United Arab Emirates |
| 12. France    | 25. Latvia     | 38. Poland      | 51. Uzbekistan           |
| 13. Georgia   | 26. Lebanon    | 39. Qatar       | 52. Vietnam              |

## Sanction Network Risk

Sigma360's data is organized in a proprietary network graph that highlights not only the focal entity's risk, but also any sanctioned entity within 3 degrees of separation (hops) on a family or ownership relationship chain.

The product also identifies sanctions associations 1 hop away on non-ownership relationships.

# Political Exposure (PEP) & State-Ownership (SOE)

Sigma360 maintains a global PEP list of **approximately 1.6 million across 194** jurisdictions that conforms with the Financial Action Task Force's (FATF) definition across four levels.

To maintain this, 40,000 sources across 45+ languages aide in creating and maintaining relevant profiles of both PEPs and Relatives/Close Associates (RCAs). Sigma360 users may search for entities, which will return identified associated individuals and whether the individual is possibly a PEP.

Current PEPs are further sub-categorized into 3 levels, depending on their positions held.

- Level-1: Heads of state, parliament, military, supreme court, central bank, & political parties
- Level-2: Members of legislative bodies, lower courts, state-owned-enterprises, military etc.
- Level-3: Members & advisors of cabinet, trade unions, local councils, municipalities, etc.

In addition, former PEPs are sub-categorized based on the duration since they last held office, within 12 months or greater than 12 months.

## Coverage by Jurisdictions

Africa & Middle East	Algeria Angola Bahrain Benin Botswana Burkina Faso Burundi Cabo Verde Cameroon Central African Republic Chad Comoros Congo Cote d'Ivoire Djibouti Egypt Equatorial Guinea Eritrea Eswatini Ethiopia Gabon Gambia Ghana Guinea Iran Iraq Israel Jordan Kenya Kuwait Lebanon Lesotho Liberia Libya Madagascar Malawi Mali Mauritania Mauritius Morocco Mozambique Namibia Niger Nigeria Oman Palestine, State of Qatar Rwanda Sao Tome and Principe Saudi Arabia Senegal Seychelles Sierra Leone Somalia South Africa South Sudan Sudan Syrian Arab Republic Tanzania, United Republic of Togo Tunisia Uganda United Arab Emirates Yemen Zambia Zimbabwe
Asia & Oceania	Afghanistan Armenia Australia Azerbaijan Bangladesh Bhutan Brunei Darussalam Cambodia China Fiji Georgia Hong Kong India Indonesia Japan Kazakhstan Kiribati North Korea, South Korea Kyrgyzstan Lao People's Democratic Republic Malaysia Maldives Marshall Islands Mongolia Myanmar Nauru Nepal New Zealand Niue Pakistan Palau Papua New Guinea Philippines Samoa Singapore Solomon Islands Sri Lanka Taiwan Tajikistan Thailand Tonga Turkmenistan Tuvalu Uzbekistan Vanuatu Vietnam
Europe	Albania Andorra Austria Belarus Belgium Bosnia and Herzegovina Bulgaria Croatia Cyprus Czech Republic Denmark Estonia Faroe Islands Finland France Germany Greece Hungary Iceland Ireland Italy Latvia Liechtenstein Lithuania Luxembourg Malta Moldova Monaco Montenegro Netherlands Norway Poland Portugal Republic of North Macedonia Romania Russia San Marino Serbia Slovakia Slovenia Spain Sweden Switzerland Turkey Ukraine United Kingdom
The Americas	Antigua and Barbuda Argentina Bahamas Barbados Belize Bolivia Brazil Canada Cayman Islands Chile Colombia Costa Rica Cuba Dominican Republic Ecuador El Salvador Grenada Guatemala Guyana Haiti Honduras Jamaica Mexico Nicaragua Panama Paraguay Peru Saint Kitts and Nevis Saint Lucia Suriname United States of America Uruguay Venezuela

## PEPs or SOE Network Risk

Sigma360's data is organized in a proprietary network graph that highlights not only the focal entity's risk, but also any PEP or state-owned-entity within 5 degrees of separation (hops) on a family or ownership relationship chains. Only the closest PEP or SOE association is returned per focal entity currently.

# Enforcement Actions (ENF)

In addition to formal watch lists associated with sanctions, PEPs and terrorism, Sigma360 maintains additional lists of entities who are known or suspected to be involved in financial crimes such as fraud, embezzlement, or money laundering. Such watchlists are typically maintained by relevant agencies and are used to identify entities who may pose a higher risk to financial institutions.

Sigma360 enforcement actions are sub-categorized into three tiers. Nearly all enforcement actions fall into Tier-1. The US Government – North Korea Sanctions & Enforcement Actions Advisory – is classified as Tier-2, and FINRA fines as Tier-3, based on likely risk.

## Coverage by Jurisdictions

Africa & Middle East	Algeria Angola Bahrain Benin Botswana Burkina Faso Burundi Cabo Verde Cameroon Central African Republic Chad Comoros Congo Côte d'Ivoire Djibouti Egypt Equatorial Guinea Eritrea Eswatini Ethiopia Gabon Gambia Ghana Guinea Guinea-Bissau Iran Iraq Israel Jordan Kenya Kuwait Lebanon Lesotho Liberia Libya Madagascar Malawi Mali Mauritania Mauritius Morocco Mozambique Namibia Niger Nigeria Oman Palestine, State of Qatar Rwanda Saint Helena, Ascension and Tristan da Cunha Sao Tome and Principe Saudi Arabia Senegal Sierra Leone Somalia South Africa South Sudan Sudan Syrian Arab Republic Tanzania, United Republic of Togo Tunisia Uganda United Arab Emirates Yemen Zambia Zimbabwe
Asia & Oceania	Afghanistan American Samoa Armenia Australia Azerbaijan Bangladesh Bhutan Brunei Darussalam Cambodia China Fiji Georgia Guam Hong Kong India Indonesia Japan Kazakhstan Korea, South Kyrgyzstan Lao People's Democratic Republic Macao Malaysia Maldives Marshall Islands Mongolia Myanmar Nepal New Caledonia New Zealand Northern Mariana Islands Pakistan Papua New Guinea Philippines Samoa Singapore Solomon Islands Sri Lanka Taiwan Tajikistan Thailand Tonga Turkmenistan Uzbekistan Vanuatu Vietnam
Europe	Albania Andorra Austria Belarus Belgium Bosnia and Herzegovina Bulgaria Croatia Cyprus Czech Republic Denmark Estonia Finland France Germany Gibraltar Greece Guernsey Holy See Hungary Iceland Ireland Isle of Man Italy Jersey Latvia Liechtenstein Lithuania Luxembourg Malta Moldova Monaco Montenegro Netherlands Norway Poland Portugal Republic of North Macedonia Romania Russia San Marino Serbia Slovakia Slovenia Spain Sweden Switzerland Turkey Ukraine United Kingdom
The Americas	Antigua and Barbuda Argentina Bahamas Barbados Belize Bolivia Brazil Canada Cayman Islands Chile Colombia Costa Rica Cuba Dominican Republic Ecuador El Salvador Grenada Guatemala Guyana Haiti Honduras Jamaica Mexico Nicaragua Panama Paraguay Peru Saint Kitts and Nevis Saint Lucia Suriname United States of America Uruguay Venezuela

## Enforcement Network Risk

Sigma360's data is organized in a proprietary network graph that allows the user to be informed not only of the focal entity's risk, but also if there is an entity that has an enforcement action against it within 5 degrees of separation (hops) on a family or ownership relationship chain.

# News Media (MED)

Sigma360's news screening process automatically compiles data into 20 sub-categories from over 400,000 news publishers in 60 languages. Sources include publications from the primary foreign and English language national news sources in 207 jurisdictions, intergovernmental agencies, governmental agencies and regulators, think tanks, investigative journalists and news aggregators, as well as local news reporting.

Sigma360's approach uses a named entity recognition (NER) neural net to automatically scan articles, identify the named entities they mention, apply 20 distinct tags for different types of negative news, and compile that information into a database tailored for financial crime and related risk. These negative news tags cover the most common risk categories from negative news, including reports on regulatory, legal, and fraud events, as well as cases of terrorism, arms trafficking, and cybercrime among other significant events relevant to evaluating financial crime risk.

The result is a database of of nearly 1 billion news articles related to financial crime risk that is easy to search and crosscheck against the comprehensive financial crime risk data Sigma collects to create custom monitoring alerts.

## 20 Proprietary Subcategories\*

- **Leadership Change**  
*(CEO, Non-CEO Executive)*
- **Legal Risk**  
*(Conviction)*
- **Ownership Change**  
*(M&A)*
- **Financial Crime**  
*(Indirect Fraud)*
- **Human Rights Violation**
- **Technology Event**
- **Location Change**
- **Environmental Crime**
- **Arms Trafficking**
- **Credit Update**
- **Natural Disaster\*\***
- **Product Change**
- **Violent Crime**
- **Terrorism**
- **Narcotics**
- **Sexual Crime**
- **Geopolitical\*\***
- **Regulatory**
- **Other Crime**
- **Partnership**

\*Sub-Event Categories in parenthesis

\*\*Proprietary risk event category in development

## Coverage by Language

Albanian Arabic Armenian Azerbaijani Belarusian Bengali Bosnian Bulgarian Catalan Chinese Croatian Czech Danish Dutch English Estonian Farsi Finnish French German Greek Hebrew Hindi Hungarian Indonesian Italian Japanese Khmer Korean Lao Latvian Lithuanian Macedonian Malay Mongolian Nepali Norwegian Polish Portuguese Romanian Russian Serbian Slovak Slovenian Somali Spanish Swahili Swedish Tagalog Tajik Thai Turkish Ukrainian Urdu Uzbek Vietnamese

# KYC/KYB Information

Sigma maintains a global database of more than 1.5 billion corporate registration and disclosure documents that feed into our KYC profiles. The KYC profiles includes the names, aliases, addresses, countries, identifiers such as tax ID or corporate registry numbers, operating status, date of birth, date of death, industry codes or operating status. The purpose of the indicator is to encapsulate key pieces of information and facilitate monitoring.

The Americas	USA	Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, Wyoming, and Washington, D.C.
	Canada	British Columbia, New Brunswick, Newfoundland and Labrador, Nova Scotia, Prince Edward Island, and Quebec.
	Other	Antigua and Barbuda Argentina Bahamas Barbados Belize Bolivia Brazil Cayman Islands Chile Colombia Costa Rica Cuba Dominican Republic Ecuador El Salvador Grenada Guatemala Guyana Haiti Honduras Jamaica Mexico Nicaragua Panama Paraguay Peru Saint Kitts and Nevis Saint Lucia Suriname Uruguay Venezuela
Africa & Middle East	Algeria Angola Bahrain Benin Botswana Burkina Faso Burundi Cabo Verde Cameroon Central African Republic Chad Comoros Congo Côte d'Ivoire Djibouti Egypt Equatorial Guinea Eritrea Eswatini Ethiopia Gabon Gambia Ghana Guinea Iran Iraq Israel Jordan Kenya Kuwait Lebanon Lesotho Liberia Libya Madagascar Malawi Mali Mauritania Mauritius Morocco Mozambique Namibia Niger Nigeria Oman Palestine, State of Qatar Rwanda Sao Tome and Principe Saudi Arabia Senegal Seychelles Sierra Leone Somalia South Africa South Sudan Sudan Syrian Arab Republic Tanzania, United Republic of Togo Tunisia Uganda United Arab Emirates Yemen Zambia Zimbabwe	
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## Other Indicators

### **Restricted Entity (RST)**

Entities on lists published by governments that may denote operations in a high-risk industry or jurisdiction, or indirect nexus with sanctioned entities. This includes lists published by US NDAA, US Dept. of Commerce, Mexico non-compliance database, Russia disqualified persons and executives, Ireland disqualified persons, China's port authorities report of exports to North Korea, and Paraguay sanctioned entities.

### **Association Risk (ASR)**

Sigma's data is organized in a proprietary graph network that allows the user to be informed not only about the risk factors of a searched entity, but also risk factors of entities that are related to the searched entity up to 5 degrees of separation. Association risk category covers Oligarchs.

### **Jurisdiction (JUR)**

Sigma's proprietary country risk model utilizes risk factors derived from credible data sources such as World Bank, OECD, CIA, FATF, FinCEN, US State Dept., IMF, Corruption Perception Index, and computes a numerical score. The score is then partitioned into 4 levels of risk – highest, high, medium & low.

### **Enforcement Action (ENF)**

Sigma uses a third-party provided NLP model to organize business descriptions and materials available on the internet into industry classes. Sub-categories include:

- Cash-intensive businesses: high-risk based on criteria published by the FFIEC.
- Cannabis businesses: Any nexus to Cannabis at any stage in the supply chain is flagged as high-risk.
- Sigma curated list of high-risk entities based on their industry of operations, such as military and dual-use.
- Publicly traded entities: Flagged as low risk if listed on trusted exchanges, as they are exempt from FinCEN's final CDD rule.

### **Registration Status (STA)**

This refers primarily to whether an entity has ongoing business operations, or is not active, bankrupt or delinquent in any way. In addition to the the corporate registry status, Sigma also sources status from the Global Legal Entity Identifier Foundation (GLEIF), FINRA, FCA, and the Cayman Islands General Registry "Struck Off" List.

### **Transparency (TRN)**

Any risk related to bearer shareholder and the Offshore Leaks database.

### **Address (ADD)**

Sigma identifies addresses that are shared by an unexpectedly high number of businesses and conducts research to check whether these are in close proximity to known shell company, bearer shares, virtual office, corporate service provider or a sanctioned entity addresses.

# Sigma360 Intelligence (Sentinel)

Beyond Sigma360's extensive traditional financial crime, KYB and media data holdings, **additional intelligence is provided to end-users that is either not commonly found or available elsewhere.**

Sigma360 curates this special insight data and creates derivative intelligence that drives industry-leading risk insight and awareness.

## **Sentinel specific data includes, but is not limited to:**

1. Link analysis using sanctions and other reporting as the basis
2. Possible shell company & high risk address
3. Leaked databases
4. Bespoke reporting sources (e.g., one-off investigative reporting)
5. Normalized NGO reporting (e.g., modern slavery reporting)