

MOODY'S

Third Party Risk Solution

Chua Choon Hong

TPRM Practice Lead Senior Director

Changing landscape across the world

'Liberation Day' 2.0: What's coming and who will feel it the most



World Business Markets Sustainability Legal Commentary More

US launches unfair-trade probes to rebuild Trump's tariff pressure

By David Lawder and Ismail Shakil

March 12, 2026 7:14 AM GMT+8 · Updated March 13, 2026



THE STRAITS TIMES | Iran closes Hormuz Strait again over US blockade; ships reverse course

Trump hikes India levy over Russian oil as tariff deadline looms

Beiyi SEOW

Thu, 7 August 2025 at 8:01 am SGT · 4-min read



SeatradeMaritimeNews

Strait of Hormuz Containers Tankers Dry Bulk Ports Accidents & Security More Topics Events

Strait of Hormuz The latest news and commentary on how the US/Israel-Iran conflict is affecting the global maritime industry and shipping markets.

Iran and US say the Strait of Hormuz is completely open

Statements from both Iran Foreign Minister Araghchi and President Trump say the Strait of Hormuz is fully open but US Naval blockade remains in force



Marcus Hand, Editor
April 17, 2026

2 Min Read



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Iran closes Hormuz Strait again over US blockade; ships reverse course

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Iranian state TV reported that 'control of the Strait of Hormuz has returned to its previous status'. PHOTO: REUTERS

Aid on a preferred source on Google

Published Apr 18, 2026, 05:46 PM
Updated Apr 18, 2026, 11:10 PM

TheJakartaPost

INDONESIA BUSINESS WORLD OPINION CULTURE DEEPDIVE FRONT ROW THE WEEKENDER E-POST

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IDX plunges after MSCI warning about RI stocks

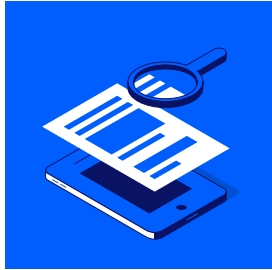
The Indonesia Stock Exchange (IDX) temporarily halted trading on Wednesday after shares plunged on a warning from global index provider MSCI that it could downgrade Indonesian stocks to frontier-market status.

Ni Made Tasyarani (The Jakarta Post)

PREMIUM Jakarta • Wed, January 28, 2026

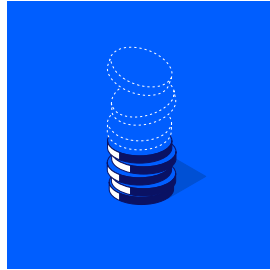
Gift Full Article

Exponential Risk we help address



Firmographics

Can we verify and enhance the information given by the client?



Financial Risk

What is the client's financial condition?
How is a supplier's financial condition trending?
Can we source & spread financials?



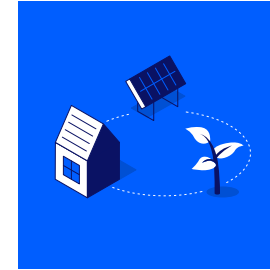
Regulatory Risk

What is a client's risk for key compliance areas?



Reputational Risk

With constant monitoring, what is a client's significant risk?



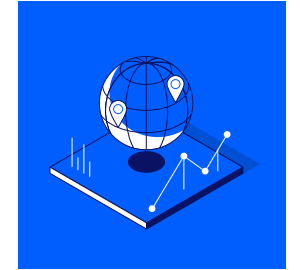
Investment Risk

Is there risk in assets I want to invest or acquire?



Cyber Risk

What is the cyber security performance of my clients?















Operational Risk

Which of our critical clients are at risk of deteriorating performance for quality, cost and delivery times?

TPRM Journey



Data supporting risk factors in profiling of third party in risk management

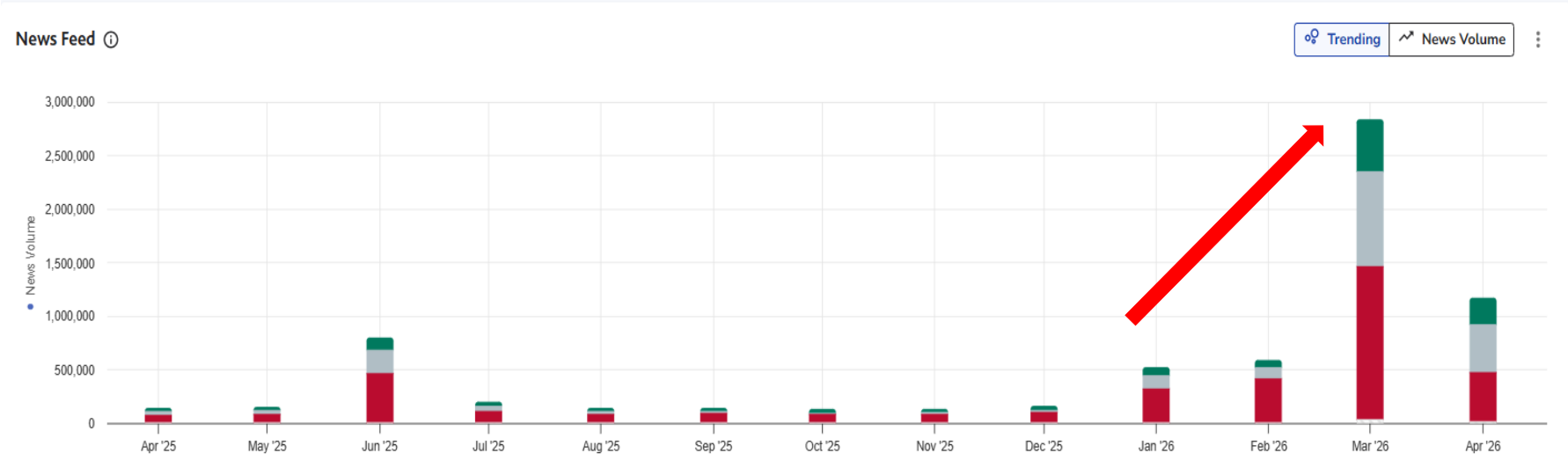
 Supplier performance and disruption risk	 Material shortages and price increases pre-dating the pandemic	 Unprecedented demand planning difficulty	 Perilous complexity of sanctions, anti-corruption and other areas of compliance
 Labor shortage and increased competition for skilled resources	 Geopolitics (e.g., Russia / Ukraine, China vs nearshoring / friendshoring) leading to low supply / high prices	 Deteriorating global economy	 Inflation complicating price negotiations with suppliers
 Need for additional inventory of important materials	 Successful cyber attacks on suppliers and threats to sensitive data, documents and drawings	 Visibility into suppliers and the products, services, materials they deliver	 Environmental & social responsibility performance and susceptibility to climate disasters

Scanning Events from OSINT for Black Swan Events

Middle East Conflict

Locations 1 ^

- Asia (5,203)
- Western Asia (5,114)
- Israel (4,370)
- West Bank and Gaza Strip (3,254)
- Gaza City (3,105)
- Americas (2,121)
- Lebanon (2,105)



Tracking potential sudden geopolitical risk events by regions

Importance of third-party risk management

Over US\$300 million's worth of Volkswagen, Audi, and Porsche cars are held up at a US port due to violation of using banned parts.

The US has issued bans on imports from Xinjiang or goods mined, manufactured, or produced by an entity on the **Uyghur Forced Labor Prevention Act Entity List**. This order is issued under 19 U.S.C. 1307

One of Volkswagen's downstream indirect suppliers sourced a subcomponent from the banned region.

This violation incident can cost potentially millions from:

- Additional shipping, operation and fuel costs
- Fines for violation
- Lawsuits from clients over delays

It is important to have holistic view of all third-party risks within your supply chain network in manufacturing:

- Sanctions
- Reputational
- Financial
- Operational



Export Controls - Predictive Insights to Risk

High country risk prior to sanctions risk

MOODY'S Entity management Reports User management Policy builder Multi-Tier Risk Visibility

2rivers Pte. Ltd.
COMPANY

Overview

ENTITY MANAGEMENT

Entity data

Audit report

Conversations

External communication

AI assistant

ASSESSMENTS

Assessment overview

Assessment risk scores

Supplier

DUE DILIGENCE TASKS

Required for open assessments

Verify company details
Task passed

Company screening
Task incomplete

Company screening ⓘ

Mark task as complete

Company screening

Unresolved events Company screening with GRID Integration
13 July 2025 at 1:05 AM

INFORMATION USED TO RUN THIS CHECK

Company name: 2rivers Pte. Ltd. 1 of 1 addresses: New Bridge Centre, 336 Smith Street
#04-304
Singapore 050336
Singapore

Country of Incorporation: Singapore

State of Incorporation: Singapore

Unresolved matches (4) Confirmed matches (0) False positives (0)

NAME	COUNTRY	EVENT CATEGORIES	ALERT SCORE
<input type="checkbox"/> 2Rivers Group	Russia United Arab Emirates Singapore United Kingdom Azerbaijan	Sanctions, Adverse media	0.9546
<input type="checkbox"/> 2RIVERS PTE LTD	Singapore	Sanctions	0.9546
<input type="checkbox"/> 2Rivers PTE LTD	Singapore	Sanctions	0.9168
<input type="checkbox"/> 2RIVERS PTE LTD	Singapore	Adverse media	0.6407

Pre-emptive insights to risk:

Insights into potential risk

- High-risk nationality associated with the entity
- Indicative precursor to sanctions or export control
- Source alternative suppliers

Global ultimate owners ⓘ

NAME	DISTANCE	SHARE (%)
GARAYEV TAHIR		

Unresolved matches (2) Confirmed matches (0) False positives (0)

NAME	DATE OF BIRTH	COUNTRY	EVENT CATEGORIES	ALERT SCORE
<input type="checkbox"/> Tahir GARAYEV	01 January 1980	Switzerland	Sanctions	0.6395
<input type="checkbox"/> Takhir Gadir Ogly Garaev	13 January 1980	Russia United Arab Emirates Malta	Sanctions	0.4421

Case Study 1 – Source with Russian Hidden Links – Challenges with downstream export regulations

To understand holistically the potential risk of source of oil products

KHAILON OIL SERVICE LTD
 Malaysia

Active
 BvD ID: MY*F0006962 Orbis ID: 536623185 Private
 This company is Independent (but not the Global Ultimate Owner of a Corporate Group)

< > Key information

Malaysia

Legal form:
Type of entity:

Public limited company
Corporate

Operating revenue (Turnover)
No financial information available

P/L [=Net Income]
No financial information available

Ownership
0 shareholder
1 subsidiary
0 company in the corporate group
[More >](#)

PEPs and sanctions
 This company is **not** the same or similar to a risk relevant name

KHAILON OIL SERVICE LTD
 Malaysia

Active
 BvD ID: MY*F0006962 Orbis ID: 536623185 Private
 This company is Independent (but not the Global Ultimate Owner of a Corporate Group)

< > Current subsidiaries

Filter by

Add/remove columns

Name	Country	Type	Ownership		Status	Info		Op. Rev. (m USD)	No of employees	
			Direct %	Total %		Source	Date			
FILIAL KHAILON OIL SERVICE LTD. G. MOSCOW	RU	C	=	-	n.a.	-	CP	03/2022	0	2

Today's Executive Order bans:

- The importation into the United States of Russian crude oil and certain petroleum products, liquefied natural gas, and coal. Last year, the U.S. imported nearly 700,000 barrels per day of crude oil and refined petroleum products from Russia and this step will deprive Russia of billions of dollars in revenues from U.S. drivers and consumers annually.
- New U.S. investment in Russia's energy sector, which will ensure that American companies and American investors are not underwriting Vladimir Putin's efforts to expand energy production inside Russia.
- Americans will also be prohibited from financing or enabling foreign companies that are making investment to produce energy in Russia.

Case Study 2 – Indonesian Company Potential With Hidden Risk

Potential Russian Government Proxy Control

Indonesian Company under Foreign Sanctioned SOE PEP

PETRO GTL INDONESIA PT
JAKARTA, Indonesia

JOINT-STOCK COMPANY GTL
MOSCOW, Russian Federation

Active
BvD ID: RU52807509 Orbis ID: 014731725

Publicly quoted
This company is the Global Ultimate Owner of the corporate group

Active
BvD ID: ID*932116704 Orbis ID: 383187831

Private
The Global Ultimate Owner of this controlled subsidiary is JOINT-STOCK COMPANY

Key information

JAKARTA, Indonesia

Type of entity: Corporate

Operating revenue (Turnover): No financial information available

P/L [=Net Income]: No financial information available

Ownership: 1 shareholder, 0 subsidiary, 6 companies in the corporate group

PEPs and sanctions: This company is not the same or similar to a risk relevant name

Boards & committees: 8

Boards of directors (8)

MR MIKHAIL YURIEVICH IVANOV
Chairman of the Board of Directors
Председатель совета директоров
Also shareholder

Joint-Stock Company GTL (RU) → 49.00/n. a. → Petro GTL Indonesia PT (ID)

Potential Foreign Government Proxy Control

Entity Info

Entity Information

Entity ID: 171418127

Riskid: R125800992

Entity Name: Mikhail Yurievich Ivanov

Alias: Михаил Юрьевич Иванков

PEP Type:

- NIO / L1 - Senior Official In Non-Infrastructure Division or Agency, Level 1 - Head - Federal Service for Labor and Employment, The Ministry of Labour and Social Protection, The Russian Federation (-/-/2019 -)
- NIO / L2 - Senior Official In Non-Infrastructure Division or Agency, Level 2 - Adviser - Russian President Administration, The Russian Federation
- NIO / L2 - Senior Official In Non-Infrastructure Division or Agency, Level 2 - Deputy Head - Federal Service for Labor and Employment, The Ministry of Labour and Social Protection, The Russian Federation (-/-/2013 -)

PEP Rating: C, 7/5/2022

Address:

- BIRTH - Yartsevo, Yartsevo, Smolensk, RUSSIAN FEDERATION
- Myasnitskaya street, 40, building 16, Moscow, Moskva, RUSSIAN FEDERATION

Date of Birth: 11/23/1966

Sex: Male

Recent Events: PEP / ASC - Date:2/6/2023, On List [PEP Connect - Russia], PEP Connect - Russia, 2/6/2023

Global Expectations

Meeting standards required for governance and compliance

- **Global Transparency Standards:** In mature financial markets, governance transparency is an expected norm for public listed companies and regulatory bodies are expected to enforce the governance and transparency.
- **Institutional Investor Confidence:** Meeting international criteria signals to global funds that there is a mitigation of price manipulation risks, making the corporate landscape a safer destination for high-quality capital.
- **Benchmarking Regulatory Maturity:** Expected new reforms will demonstrate that emerging markets must adopt standardised disclosure frameworks to maintain inclusion in global indices and remain competitive in the international arena.

Third-Party Risk Program

Process	Problem Statement	Solution
3 rd Party Risk Assessment	Where and what are the risk the business face?	Risk factors around entities e.g. Sanctions, export control
Develop Risk Policies	What are the processes we need to follow?	Develop a step-by-step from onboarding to off-boarding
Appoint Management Oversight	Who has the authority to approve and enforce the policies?	Appoint a champion who answers directly to the board or owner
Quantifiable Due Diligence	How do we measure the risk?	Threshold for risk categorisation: high, medium, low
Control	How do we investigate the risk?	Readily available information for investigation with audit trail
Report	What are the supplier risk assessment to report?	Develop specific risk factors tailored to your operations
Training & Awareness	Do we know what to do?	Understanding the process and policy
Monitor	How do we continue to monitor the risk?	Continuous tracking of changes in risk and training

The image features a dark blue background. In the center, there are large, bold, blue letters 'MM' with a stylized, blocky font. To the right of the 'MM' is a large, blue, stylized quote mark. Overlaid on the 'MM' and the quote mark is the text:

**“If it is not documented, then you
have not done the work .”**

The Operational Challenge

- Manual input of entity names in screening tool
- No active monitoring when new risk appears
- Lack of visibility in corporate ownership structure
- Financial assessment not in current workflow
- Risk assessment workflow is separated from supplier onboarding workflow



Process Flow

1. Acquire

Collect third-party information required

2. Onboard

Assess risk, execute due diligence and decide

3. Monitoring

Monitoring of supplier data

4. Review

Reassess risk, implement new policies

5. Refresh

Remediate data gaps (lack of/expiry), decide next steps

6. Offboard

Perform tasks to terminate the 3rd party lifecycle

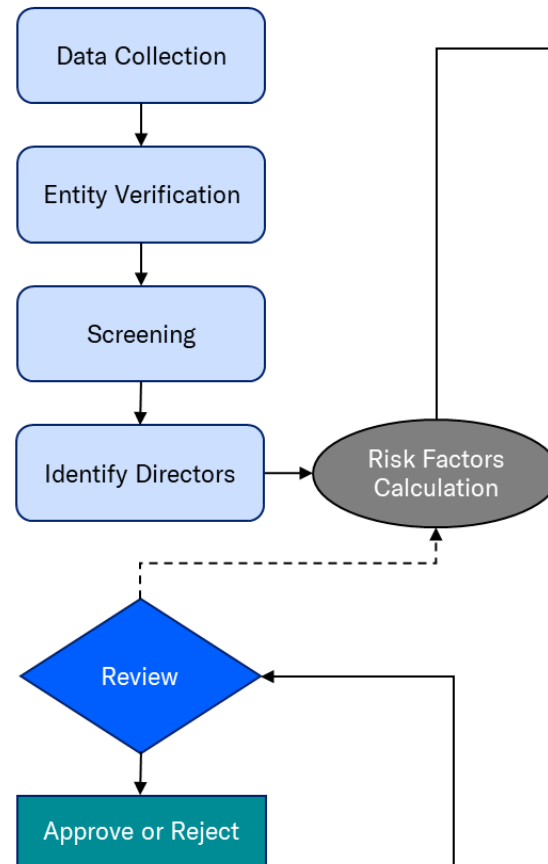
A Risk-Based Approach to 3rd Party Compliance



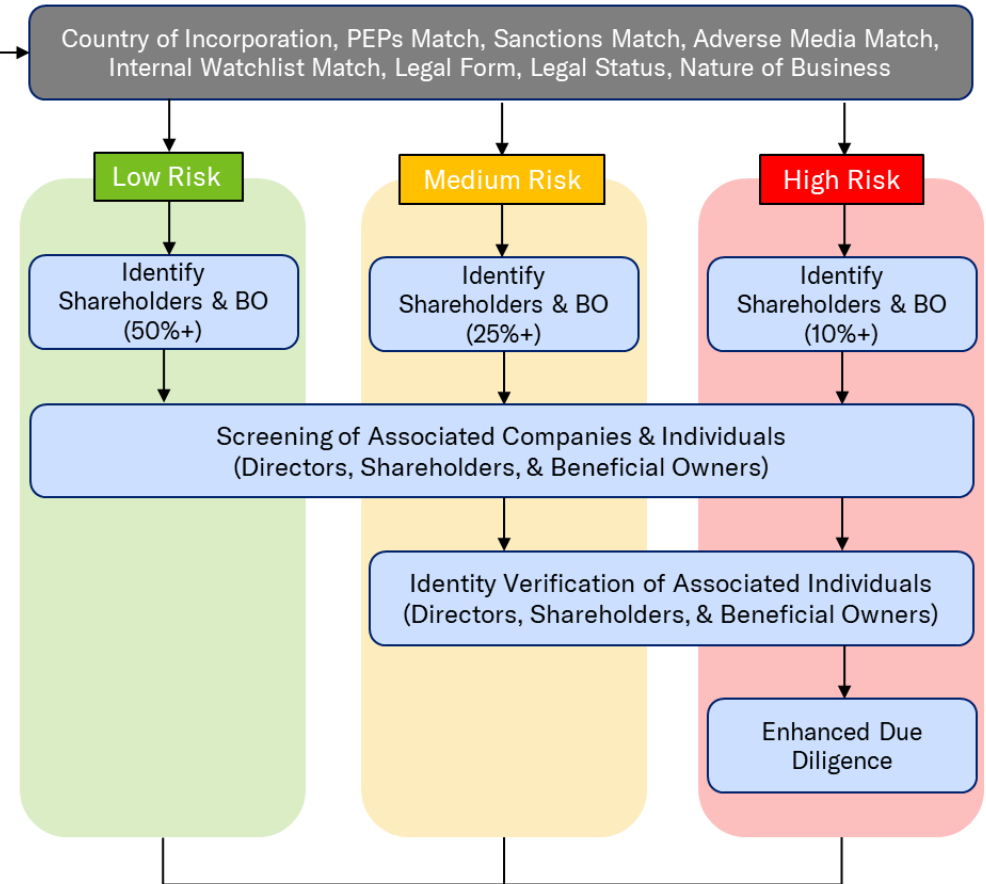
Making a Policy Operational

- 1. Regulatory Compliance:** Ensures adherence to KYC/S requirements, best practices, and GDPR regulations concerning personal data protection.
- 2. Efficient Data Collection:** Integrates business data, risk screening, into a single portal, enhancing information quality while reducing the need for manual data entry
- 3. Automated Risk Assessment:** Facilitates automated evaluations to efficiently triage cases, saving time and effort by not requiring the same level of scrutiny for every case.
- 4. Audit and Reporting:** Provides detailed, timestamped logs of all due diligence activities, serving as evidence for regulatory compliance.

Company Onboarding



Risk Level & Mitigation steps



Enhancing your risk parameters

While we have identified the initial risk parameters that matters now, risk is evolving and different parameters could be important for your organization down the road.

Our solution is highly scalable and comes off the shelf with our risk parameters you can use as part of your analysis



Cyber Risk

- A measure of an org's security performance their level of cybersecurity risk. Covering 6.5 mil companies globally.



Modern Slavery Risk Score

- Enables complex due diligence in a cost-effective way
- Provides one risk score with multi-level breakdown

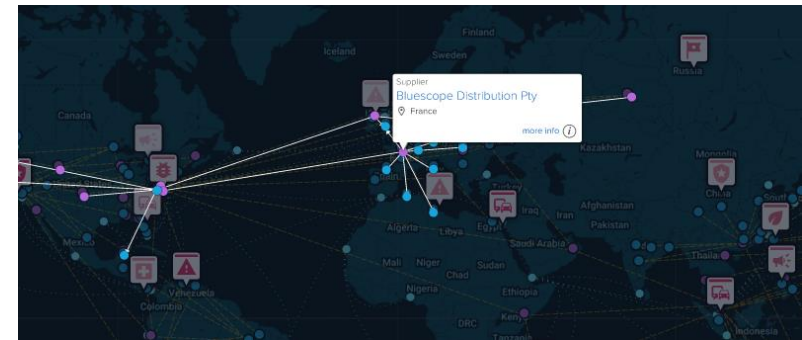
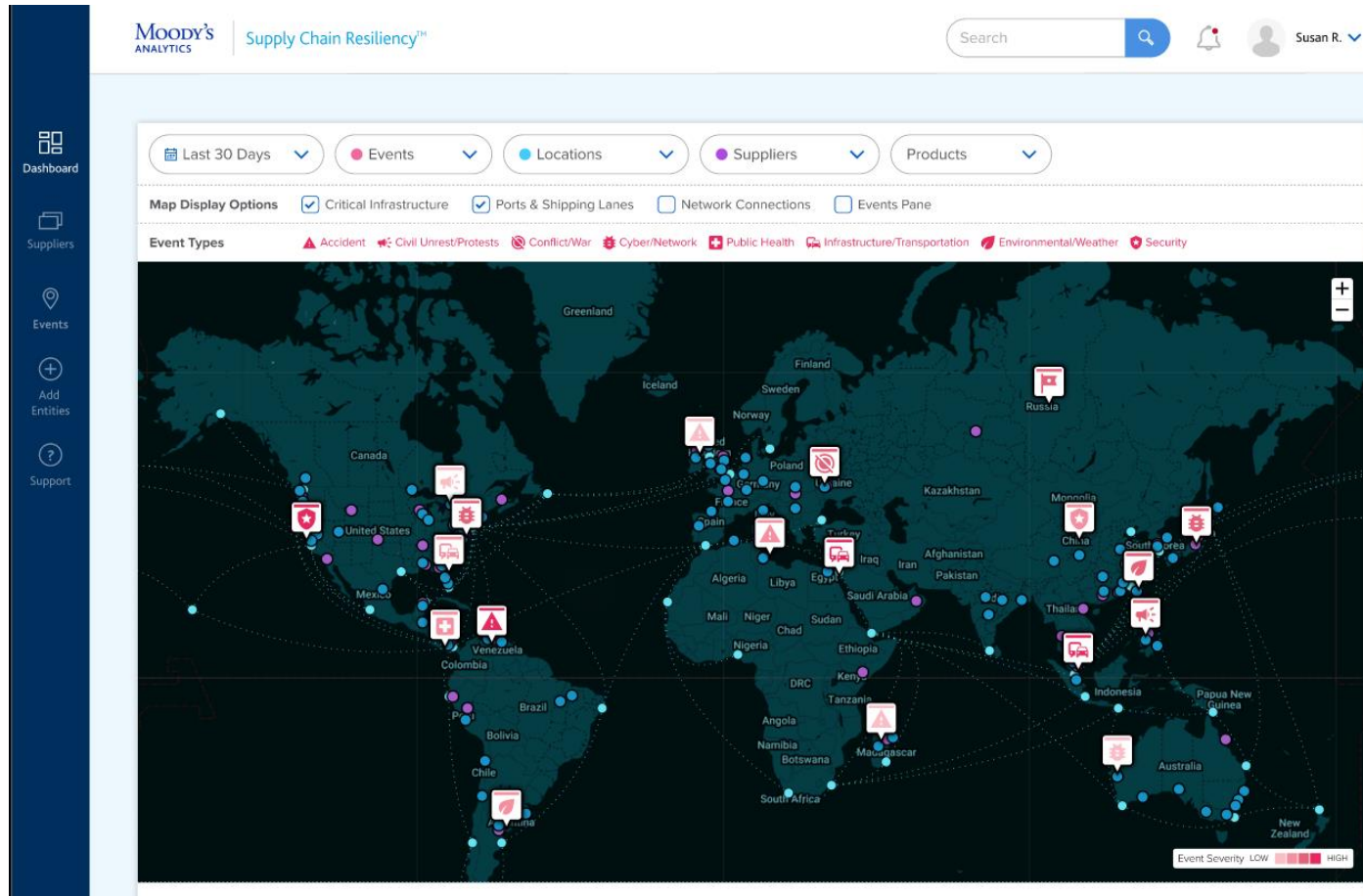


Shell Company Flag

- Reveal hidden risk by utilizing data analytics
- 7 risk parameters
 - Financial anomalies
 - Dormancy
 - Outlier age of directors
 - Mass registration
 - Jurisdictional risk
 - Circular ownership
 - Directorships

Multi-tier Supply Chain Relationships

Mapping Events, Locations, Suppliers & Products in One View



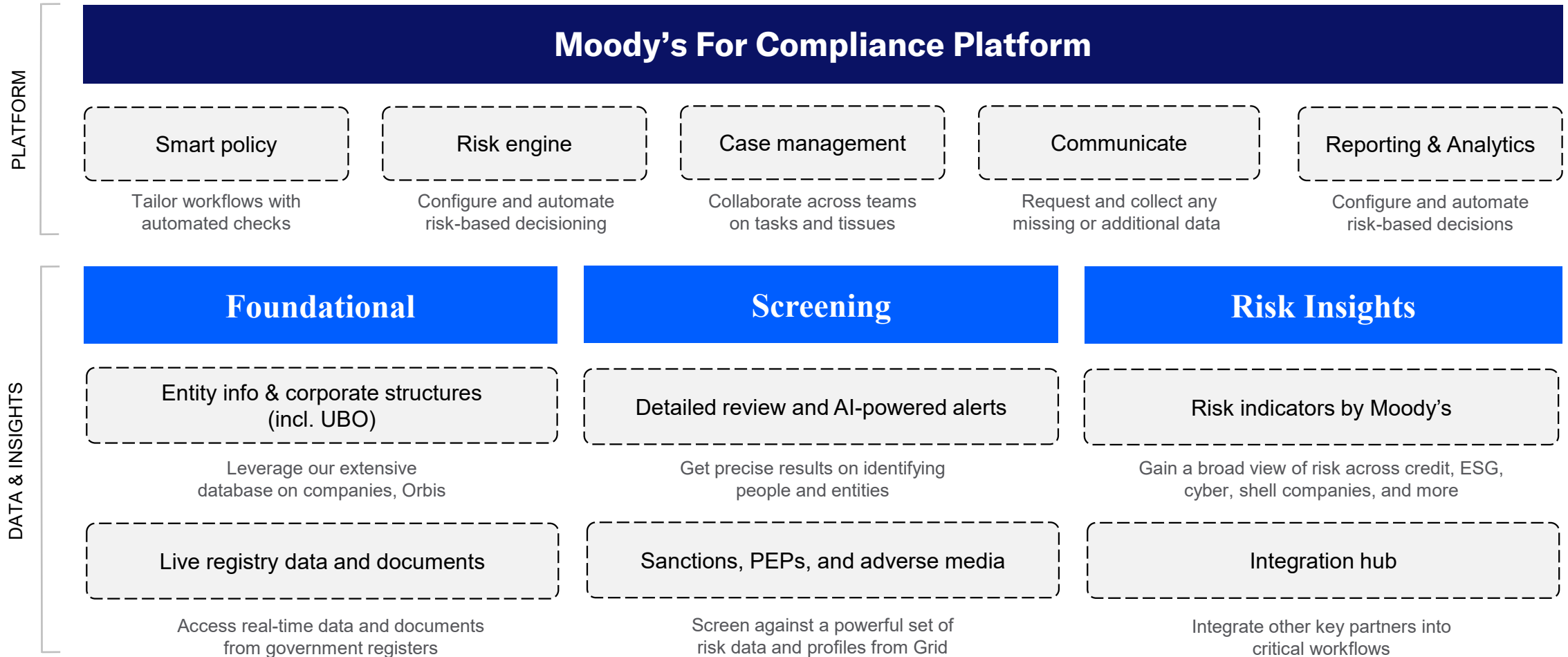
Drilldown into individual supplier's tiered supply chains

Suppliers	Products	Events	Avg. Chain Length	Critical Chains
6	36	3	4.65	1
<small>Count is based on filters and settings above</small>	<small>Count is based on filters and settings above</small>	<small>Count is based on filters and settings above</small>	<small>Count is based on filters and settings above</small>	<small>Count is based on filters and settings above</small>
<small>▼ Change in last 30 days</small>	<small>▲ Change in last 30 days</small>	<small>▲ Change in last 30 days</small>	<small>▼ Change in last 30 days</small>	<small>▼ Change in last 30 days</small>

Supply Chains Under Stress			
Name	Upstream Suppliers	Downstream Suppliers	Impact Event
Chemalloy Pty Ltd	7	4	⚠ Labor strikes close LA ports
Basell Sales & Marketing Company B.V.	8	10	⚠ Labor strikes close LA ports
Aerofli Technology Inc	9	2	⚠ Uncertainty follows tumultuous election cycle in Singapore
Motion Industries Inc	5	8	⚠ Deadly mine accident in northern Venezuela

Identify & monitor critical supply chains under stress

Automated unified risk platform overview



Moody's For Compliance Platform

Powered by Moody's leading, global data and analytics, creates shared risk intelligence to provide a unified view of an entity to help accelerate strategic decision-making and unlock new opportunities.

The screenshot displays the Moody's For Compliance Platform interface. The browser address bar shows www.maxsight.com. The navigation menu includes **MOODY'S**, Profiles, Reports, User management, and Policy builder. The left sidebar contains sections for COMPANY, PRODUCT MANAGEMENT (Overview, Profile data, Audit report, Conversations), PRODUCT APPLICATIONS (Application overview, Application risk scores, Supplier), and DUE DILIGENCE TASKS (All tasks (7), Assess company details, Assess sanctions and adverse media).

The main content area shows the **Risk score** for a **SUPPLIER**, with a **High** risk level as of 4 July 2023. The **Total score: 65** is displayed, with a legend indicating 0-35 = Low, 35-49 = Medium, and 50 or more = High.

FACTOR	RISK	SCORE	IMPACT	VALUE	VALUE SOURCE
Operational risk [?]	High	+ 25	40%	90	Assess ops risk
* Cyber risk rating [?]	Medium	+ 20	30%	358	Assess cyber risk
ESG score [?]	High	+ 15	20%	25	Entered
Country of incorporation	Low	+ 5	10%	France	Company details
Active company	Low	0	0%	Yes	Link name

Operational Efficiency

- Reduce manual tasks
- Minimize data entry errors
- Auditable documentation collection

The screenshot shows a web form titled "Add a new profile" with a close button (X) in the top right corner. Below the title are two tabs: "Individual" and "Company". The "Company" tab is selected. The form contains several sections:

- Company information:** A link labeled "Enter manually" is positioned to the right of the section title.
- Country of Incorporation - required:** A dropdown menu is set to "Singapore" with the code "SGP" to its right.
- State of Incorporation:** An empty text input field.
- Search for a company:** A search bar containing the text "Aperia Cloud" with a magnifying glass icon to its right. Below the search bar is a list of search results:
 - Aperia Cloud Services:** UEN: 53472397K, ANG MO KIO STREET 62 3 #01-46, SINGAPORE, 569139
 - Aperia Cloud Services Pte. Ltd.:** UEN: 202334201Z, LINK@AMK, 3 ANG MO KIO STREET 62 #01-46, SINGAPORE, 569139
 - Aperia Cloud Services (I) Pte. Ltd.:** UEN: 202334201Z, LINK@AMK, 3 ANG MO KIO STREET 62 #01-46, SINGAPORE, 569139
- Incorporation date:** A text input field with the placeholder "YYYY-MM-DD".
- Entity type:** A dropdown menu currently showing "Not known".
- Shares:** Two radio button options: "Publicly traded" and "Private".

Automated Form for data collection and self declaration

Links to data registry without the need to buy individual reports

Automating Risk Based Approach

- Translate risk policy into a workflow
- Predetermined risk factors
- Create high-value work

Automated business process following risk policy

The screenshot displays the Moody's Maxlight interface for a company profile. The company name is 'Aperia Cloud Services Pte. Ltd.'. The dashboard is divided into several sections: 'DUE DILIGENCE TASKS' on the left, 'Overview' in the center, and 'SUPPLIER: RISK SCORE' and 'SUPPLIER: NEXT TASK' on the right. The 'DUE DILIGENCE TASKS' section lists various tasks, with 'Verify Company Details' marked as 'Task passed'. The 'Overview' section provides details about the company, including its address, company number, shares, liability, and incorporation date. The 'SUPPLIER: RISK SCORE' section shows a 'High' risk score and a '100%' impact. The 'SUPPLIER: NEXT TASK' section shows 'Assess TrueBiz Web Presence' as the next task. A blue box highlights the 'Verify Company Details' task, another blue box highlights the 'Supplier: Risk Score' section, and a third blue box highlights the 'Supplier: Next Task' section.

Risk dashboard for quick decision making

Portfolio Management

- Monitor changes in risk of portfolio
- Make timely decision
- Maximize ROI

Monitors risk real time

The screenshot shows the Moody's Maxlight interface with a table of monitored profiles. The table has columns for Name, Product Application, Entity Type, Tags, Risk Level, Flag, Status, Assignee, and Application Date. A blue box highlights a row with a 'High risk' status, and a blue line points from the text 'Monitors risk real time' to this row.

NAME	PRODUCT APPLIC...	ENTITY TYPE	TAGS	RISK LEVEL	FLAG	STATUS	ASSIGNEE	APPLICATION DATE
Philosofish S.A.	Supplier	COMPANY	+	Low risk	Decided	Approved	Unassigned	07 March 2025 at 5:19 PM
Philosofish S.A.	Supplier	COMPANY	+	Low risk	Decided	Approved	Unassigned	07 March 2025 at 4:16 PM
Philosofish S.A.	Supplier	COMPANY	+	Low risk	Decided	Approved	Unassigned	06 March 2025 at 10:08 ...
Curious Universe U...	AML Screening	COMPANY	+	Low risk	Decided	Approved	Unassigned	06 March 2025 at 6:17 PM
Curious Universe U...	AML Screening	COMPANY	+	Low risk	Decided	Approved	Unassigned	06 March 2025 at 1:24 AM
Curious Universe U...	AML Screening	COMPANY	+	High risk	Decided	Approved	Assigned to Oscar Wood	28 February 2025 at 11:39...
Curious Universe U...	AML Screening	COMPANY	+	Low risk	Decided	Approved	Assigned to Oscar Wood	28 February 2025 at 8:18 ...
Philosofish S.A.	Supplier	COMPANY	+	Low risk	Decided	Approved	Unassigned	26 February 2025 at 7:33 ...
Philosofish S.A.	Supplier	COMPANY	+	Low risk	Decided	Approved	Unassigned	26 February 2025 at 6:41 ...
BEE Cheng Hiang P...	AML Screening	COMPANY	+	Low risk	Decided	Approved	Unassigned	26 February 2025 at 11:32...
Divisa Rendering S...	Ownership Screening	COMPANY	+	Low risk	Decided	Approved	Unassigned	25 February 2025 at 1:51 ...
Curious Universe U...	AML Screening	COMPANY	+	Low risk	Decided	Approved	Unassigned	21 February 2025 at 4:48 ...
EN English (United States)	Screening	INDIVIDUAL	+		Decided	Approved	Unassigned	04 September 2024 at 7:...

Auditable Decision Trail

- Always provide accountability
- Must be auditable
- Bullet-proof your organization

The screenshot displays the Moody's Passport interface for Curious Universe UK Limited. The top navigation bar includes 'MOODY'S', 'Profiles', 'Reports', 'User Management', and 'Policy Builder'. A search bar and utility icons are on the right. A notification banner states: 'Passport is evolving. Read more about the Maxlight™ updates or contact our Client Service team for more details.'

The left sidebar lists navigation options: Overview, PROFILE MANAGEMENT (Profile data, Audit report, Conversations, Customer communication), PRODUCT APPLICATIONS (Application overview, Application risk scores, AML Screening), and DUE DILIGENCE TASKS (Required for open applications, Assess Sanctions and Adverse Media, Verify Company Details, Assess Company Ownership - Screening Only). The 'EN English (United States)' language setting is at the bottom.

The main content area is titled 'Audit report' with the subtitle 'Record of all activity on the profile'. A 'Download full audit report (PDF)' button is in the top right. Below the title are filters for 'Users', 'Actions', and a date range 'February 28, 2025 to March 16, 2025'. The audit log shows the following entries:

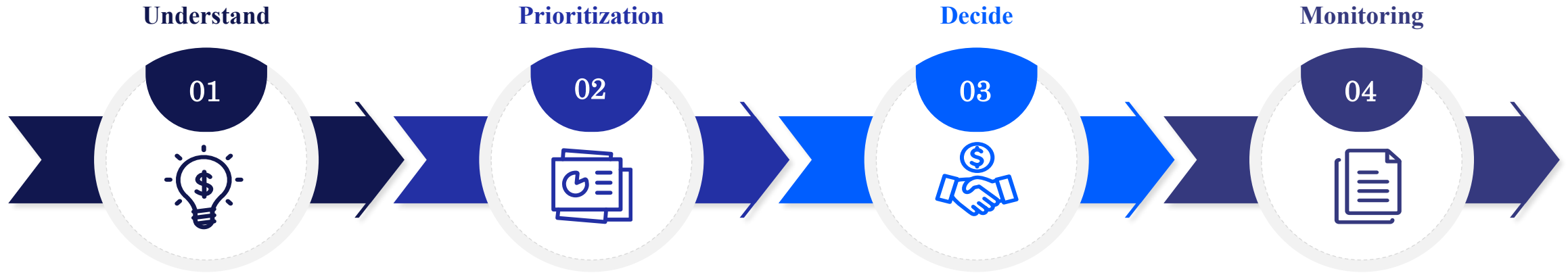
- Admin User** 16 March 2025 at 12:36:47 PM (Asia/Singapore): Viewed this profile.
- 01 MARCH 2025**
- Oscar Woodbridge** 01 March 2025 at 12:08:08 AM (Asia/Singapore): Changed the AML Screening application (applied on 28 February 2025 at 11:39 PM) status from in review to **approved** without comment.
- Oscar Woodbridge** 01 March 2025 at 12:08:00 AM (Asia/Singapore): Set status of escalation to team Escalation Team for AML Screening to Approved
- Oscar Woodbridge** 01 March 2025 at 12:07:16 AM (Asia/Singapore): Completed the Company Filings task with a **pass**.
- Oscar Woodbridge** 01 March 2025 at 12:07:06 AM (Asia/Singapore): Completed the EDD Assessment task with a **pass**.
- Smart Policy** 01 March 2025 at 12:06:44 AM (Asia/Singapore): **Pass** Third-Party Due Diligence Questionnaire form with
- Smart Policy** 01 March 2025 at 12:06:43 AM (Asia/Singapore): Completed customer requestwith:

The background features a dark blue gradient with intricate, glowing blue wavy lines that create a sense of depth and movement, resembling a digital or data landscape.

Future Proofing through GenAI

Generic vs Specialized Gen AI Solutions

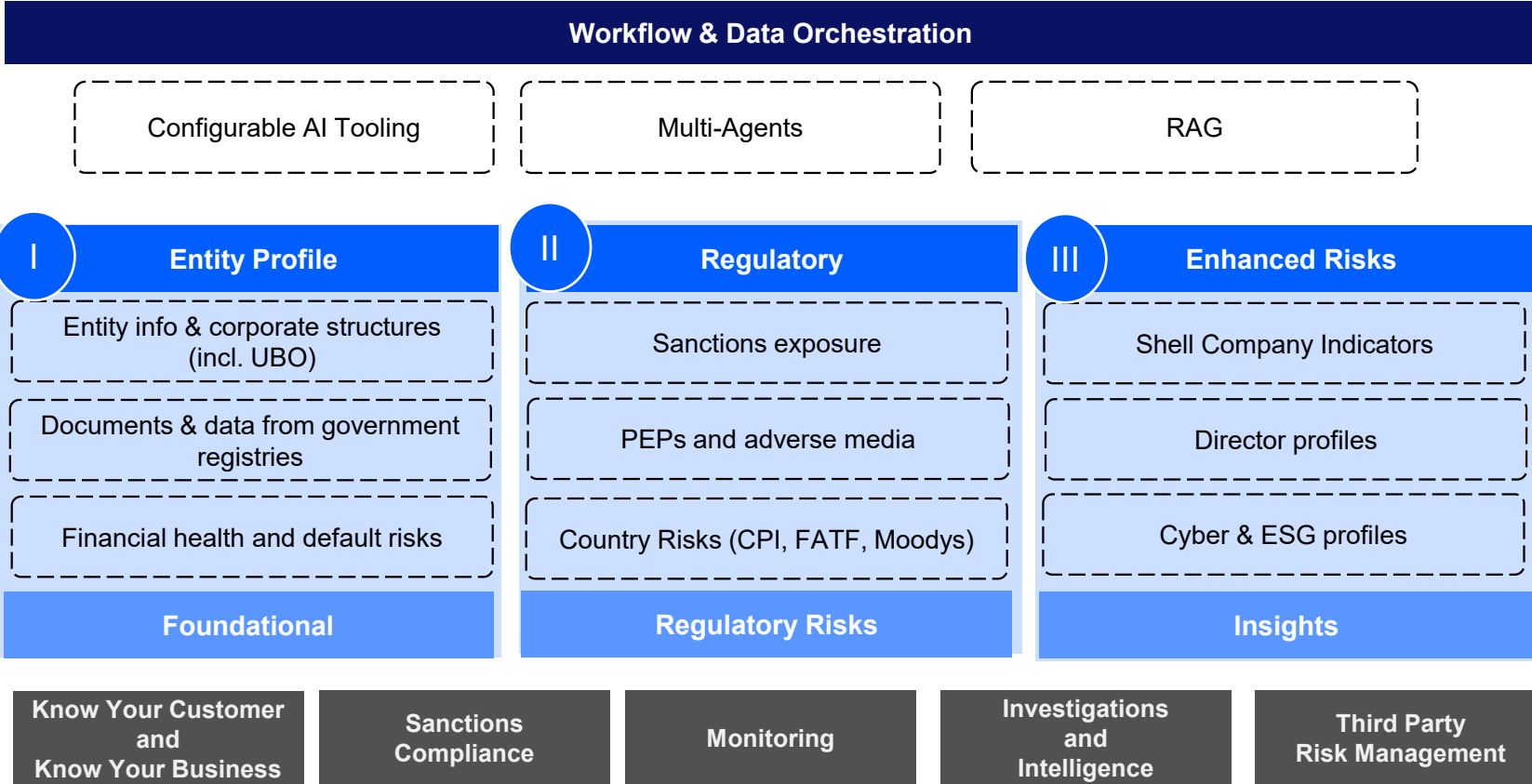
For business decisions, specialized and transparent solutions are essential



Question	01 Understand	02 Prioritization	03 Decide	04 Monitoring
Response Elements	<ul style="list-style-type: none"> • Access the latest information • Analyse economic environment and latest developments • Adverse media monitoring • Cross-border operational risk assessment 	<ul style="list-style-type: none"> • Access to company data, their firmographics and financials • Latest news and developments for the companies • Screening against sanctions list, PEP and other regulatory requirements • Simulation of supply chain disruptions 	<ul style="list-style-type: none"> • Company description, shareholders, company structure • Sector outlook, positioning, peers • Country Risk, Geopolitical Tensions • Financial analysis, credit assessment and rating 	<ul style="list-style-type: none"> • Macro and sector signals • Financial and credit risk signals • News sentiment • Operational Signals • Compliance Risk – sanctions violations, ESG non-conformities (e.g. Korea’s Green New Deal regulations)

Client & Counterparty Due Diligence

Increase investigative depth and uncover hidden risks



Compared to 5-10 business days per report from existing service providers

1 Automated Data Aggregation: collect comprehensive firmographic, financial and other information immediately

2 Dynamic risk screening: automatically flag anomalies, risk detection, and hidden risks or suspicious activities

3 Contextual Risk Scoring: summarizes findings and assigns contextualized scores based on regulatory, geographic and other risk factors

4 Actionable Reporting & Continuous Monitoring: produce CDD report with the identified risk profiles enhancing speed and quality of targeted customers

Risk Assessment - Key Indicators

Summarised key findings

2025, Taipei prosecutors conducted 47 simultaneous raids linked to the investigation and seized approximately NT\$4.5 billion (about US\$145 million) in assets, including luxury properties, vehicles, and bank accounts. [9][7][8] Reported risk themes in the available materials include sanctions designation, active criminal investigation activity involving alleged money laundering and fraud, and allegations connecting proceeds to overseas scam operations, with asset seizures indicating material legal and operational constraints during the investigation period. [9][9] Separately, internal disputes within the organization were reported, with certain Prince Group affiliates accusing a key figure of embezzling approximately NT\$900 million (US\$28 million) by transferring corporate funds into personal and offshore accounts. [10] The purpose of this IDD summary is to consolidate the available adverse legal, regulatory, and reputational indicators identified in the provided source extracts, alongside documented information gaps affecting ownership/director visibility due to a missing BVD ID. [4][2]

Table 1: Risk Profile

Category	Details
Risk Jurisdiction	Taiwan; Cambodia [1][2]
Client Type	Company (real estate investment-related entity) [1][2]
Nature of Business	Real estate investment promotion; allegations in reporting describe use as a vehicle to funnel proceeds from overseas scams into Taiwan real estate and luxury goods [1][2][9]

Table 2: Key Findings - Risk Indicators

Risk Category	Status
Sanctions	YES, The company was added to the OFAC SDN List (TCO sanctions program) on October 14, 2025. [4][12]
Organized Crime	YES, U.S. authorities designated the company under the Transnational Criminal Organizations (TCO) sanctions program. [4][2]
Regulatory Violations	YES, The company is subject to an active criminal investigation in Taiwan involving allegations of money laundering and fraud and associated enforcement actions (raids and seizures). [9]
Money Laundering	YES, Authorities allege the company was used to funnel illicit proceeds from overseas scams into Taiwan's real estate market and luxury goods sector. [9]

Risk Category	Status
Fraud and Embezzlement	YES, Reporting describes internal allegations of embezzlement of approximately NT\$900 million (US\$28 million) involving transfers of corporate funds into personal and offshore accounts. [10]
Human Rights Violations	YES, Reporting alleges laundering of proceeds connected to forced-labor scam camps in Cambodia involving trafficked workers compelled to conduct online fraud. [10][11]
Shell Indicator Flagged	YES, Reporting states the company is classified as a shell entity by international regulators. [10][11]

Fraud Risk

Modern Slavery Risk

Shell Company Risk

Sanctions Risk

Organised Crime Risk

Enforcement Risk

Money Laundering Risk

Suspicious Activities

• **Round-Tripping** (HIGH): Mr Tang Heng Tat appears as 100% UBO and director of the shipper Gyntec Carbon Sdn. Bhd. and as a director of the counterparty HOF Group Company Limited; the L/C issuing bank country (Thailand) matches the B/L destination and the beneficiary country (China) matches the B/L port of loading. ^[2] ^[3] No commercial rationale was confirmed. ^[2]

• **Trade Route** (HIGH): The B/L was issued on 10 August 2025, 10 days before the on-board date of 20 August 2025, exceeding the 7-day threshold. ^[6] No plausible logistical rationale was identified. Data gap noted: TR-02 could not be fully evaluated due to missing Port of Discharge research data.

• **KYCC Shipper** (HIGH): Gyntec Carbon is subject to US State Department sanctions (November 2024) with active watchlist, denied entity, and adverse media flags. ^[1] ^[2] Product sense check returned **INCONSISTENT** — rubber grommets are outside the company's declared nondurable goods wholesaling scope and known product mix — and this was a driver of the KYCC rating. ^[5] ^[7] ^[2] Four shell company indicators were flagged: atypical directorships, no web presence, product-goods mismatch, and no recent financials. ^[4] The UBO Mr Tang Heng Tat is directly associated with the sanctioned entity as its sole owner and current director. ^[2] Individual-level screening was not separately completed, representing a data gap.

• **Dual-Use Goods** (LOW): Rubber grommets (HS 4016.99) have no dual-use relevance and Thailand is not embargoed. ^[8]

Escalation applied: Two or more modules at HIGH simultaneously → CRITICAL HIGH. Further compounded by: (1) KYCC INCONSISTENT product sense check with other modules at HIGH; (2) confirmed sanctions on the UBO/controlling director with other modules at HIGH; and (3) four shell company indicators combined with RT-02 counterparty overlap — each independently warranting CRITICAL HIGH under the escalation rules. ^[2] ^[4] ^[2]

Risk of Intra-group transaction



Thank you

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The background features several large, overlapping, wavy shapes in a vibrant blue color. These shapes are filled with a fine, white grid pattern, creating a textured, three-dimensional effect. The waves flow from the top right towards the bottom left, with some smaller waves appearing in the bottom left corner.

Appendix

MOODY'S

Moody's vast data estate, enhanced by third-party data integrations powers Moody's For Compliance

Our extensive datasets can help you make confident risk assessment decisions more efficiently.


 Adverse Media & News

 ESG

 Climate Risk

 Firmographics

 Credit risk

 Fraud indicators

 Company Financials

 Politically Exposed Persons (PEPs)

 Corporate Structure & UBO

 Sanctions & Watchlists

 Cybersecurity

 Shell Company Risk

Access [a wide array of data types](#) to help you navigate your most difficult business challenges.

We also offer 25+ integrations from leading data providers on:

- Electronic ID
- Document Verification
- Fraud Checks
- Company Data
- and more...

Bespoke third-party integrations are also available upon request.

Our extensive entity data

LIVE REGISTRY DATA

Recognized primary source
Data directly from commercial registers from over 200 jurisdictions

Time-stamped
Entity information is consistently updated and retrieved with each request.

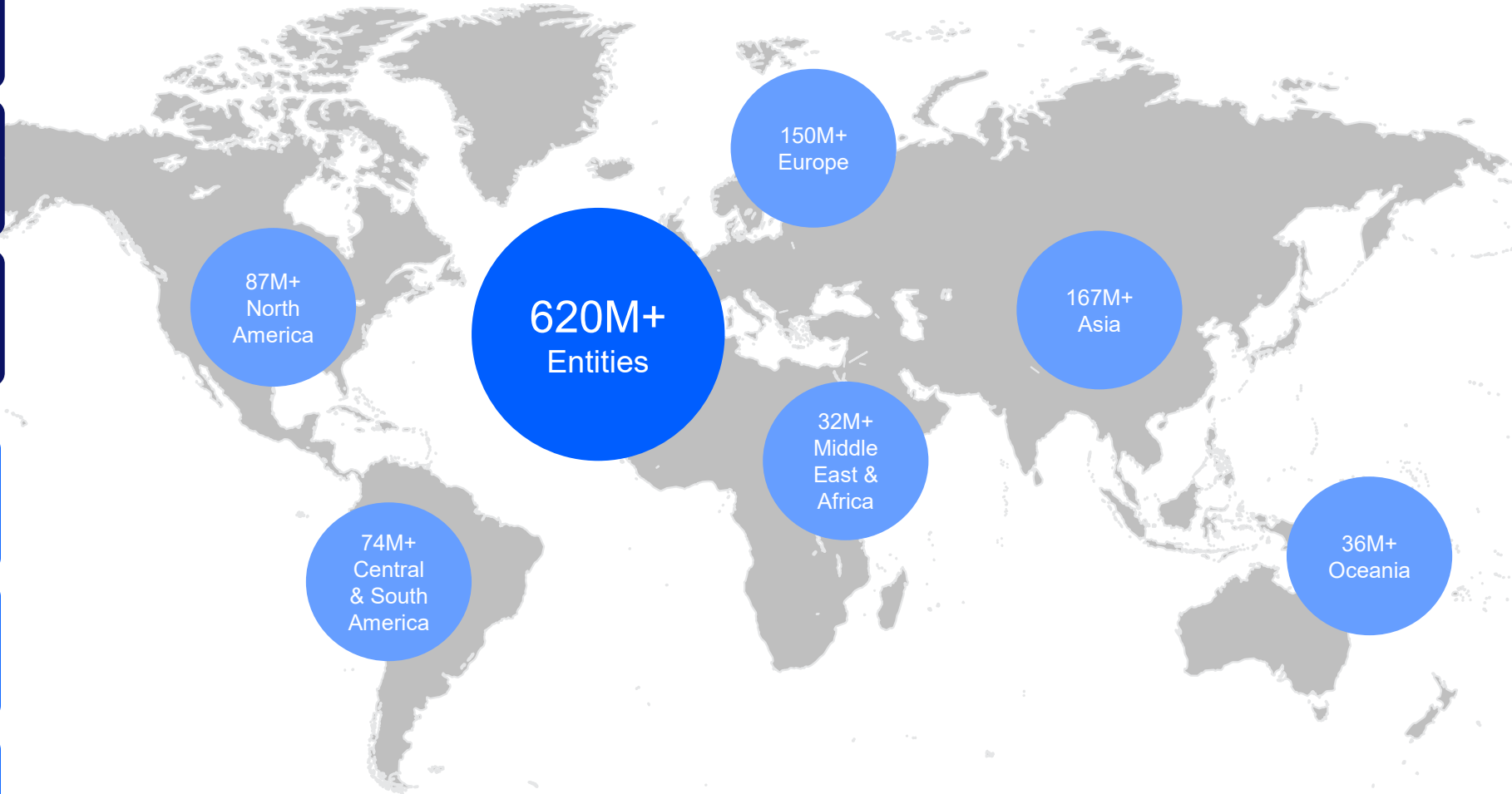
True copy
Structured data and official documents are not altered, facilitating AMLD qualification

CURATED ENTITY DATA

Powerful comparable data
Data from more than 170 sources, standardized and comparable

Extensive ownership structures
A robust view into corporate and beneficial ownership structures

A holistic view
Covering firmographic, financial details, hierarchies & ownership, and directors



Screening for Risk



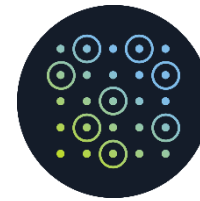
We provide a curated, risk-relevant profile, minimizing false positives, drawing on the deepest risk data without the noise



Sanctions



Politically exposed persons



Adverse media



Integrated AI financial crime screening

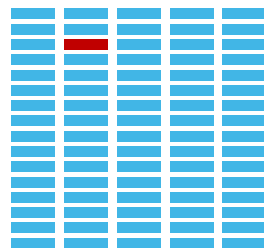
Collaborating in real time within a client environment to connect internal anomaly detection and external risk relevant insights for a single view of counterparty risk.

100 to 1 as submissions go through the multiple stages of filtering and review

25M+ curated risk profiles; 1 per individual or entity

Illustrative example:

100 enquires are submitted



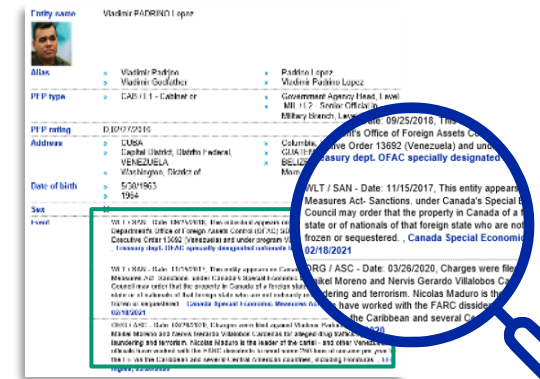
91 are systematically 'no matched' through name matching technology



8 are eliminated through false positive review



1 alert for decisioning



Risk-Based Process

Global Risk Coverage

ABU	Abuse	IRC	Iran Connect	SEC	Securities Violations
ARS	Arson	IMP	Identity Theft	SEX	Sex Offenses
AST	Assault, Battery	IPR	Prostitution	SMG	Smuggling
BRB	Bribery, Corruption	KID	Kidnapping	SNX	Sanctions Connect
BUR	Burglary	LMD	Legalized Marijuana Business	SPY	Spying
BUS	Business Crimes	LNS	Loan Sharking	TAX	Tax-related Offenses
CFT	Counterfeiting	MIS	Misconduct	TER	Terrorism
CON	Conspiracy	MLA	Money Laundering	TFT	Theft
CPR	Copyright Infringement, Piracy	MOR	Mortgage Wrongdoing	TRF	Human Trafficking
CYB	Cybercrime	MSB	Money Services Business	WLT	Sanctions / Watch Lists
DEN	Denied Entity	MUR	Murder		
DPS	Drug Possession	NSC	Nonspecific crimes		
DTF	Drug Trafficking	OBS	Obscenity		
ENV	Environmental Crimes	ORG	Organized Crime		
FOR	Forfeiture	PEP	Politically Exposed Person		
FRD	Fraud	PRJ	Perjury		
FUG	Fugitive	PSP	Possession of Stolen Property		
GAM	Gambling	REG	Regulatory Action		
HUM	Human Rights	RES	Real Estate Actions		
IGN	Weapons Possession	ROB	Robbery		



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620+M

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97%

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84%

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3 teams

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3 years

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Note: Figures as of March and June 2024.