

SCBF Sanctions Lists & Politically Exposed Persons Policy

Sanctions

SCBF does not enter into partnerships with organizations where the entity or any of its directors, officers, senior management, significant beneficial owners, or authorized representatives, is, to the best of its knowledge, subject to sanctions, restrictions, or asset-freezing measures imposed by [Switzerland](#), the [European Union](#), or the [United States](#).

Politically Exposed Persons

SCBF looks to be aware of any key Politically Exposed Persons (“PEPs”)¹ connected to the organizations it partners or with which it works. This includes any directors, board members, senior management, or significant beneficial owners, who are or have been entrusted with a prominent public function. The disclosure of a PEP does not of itself preclude a relationship with SCBF, but may require further review.

¹ A politically exposed person (PEP) is defined by the Financial Action Task Force ([FATF](#)) as an individual who is or has been entrusted with a prominent public function. Due to their position and influence, it is recognized that many PEPs hold positions that can be potentially abused for the purpose of committing money laundering offences and related underlying crimes, including corruption and bribery, as well as conducting activity related to terrorist financing. Examples include:

- Heads of State or Government: Presidents, Prime Ministers, and Monarchs.
- Senior Politicians: Cabinet ministers, members of parliament, and important political party officials.
- Senior Government Officials: Ambassadors, high-ranking civil servants, and senior military officers.
- Judiciary & Law Enforcement: Justices and high-ranking judges in supreme or constitutional courts.
- State-Owned Enterprise Executives: Senior executives, directors, and board members of state-owned corporations.
- International Organizations: Senior management (directors, deputies, and board members) of entities like the United Nations, World Bank, or International Olympic Committee.