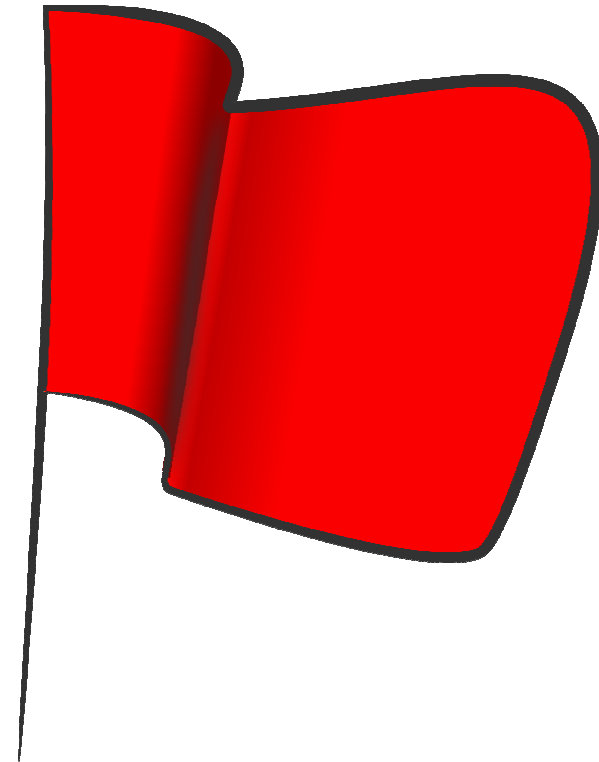


Sanctions and Compliance Update: How Far is Too Far?

- AML & Sanctions
- How does bank address a situation where document presented complies with terms and conditions of LC but shipping information inconsistent with data found on websites or other sources?
- What due diligence is required of a bank that negotiates documents and on whom? What standards apply to a presentation of documents to a nominated negotiating bank which elects not to negotiate but forwards the presented documents?
- Dealing with so-called Red Flags.



Sanctions and Compliance Update: How Far is Too Far?

- What should Advising Banks Check?
- Should Issuers do CDD on Beneficiaries?
- How to distinguish proper and improper dual use goods (e.g. sodium cyanide used for gold mining and also for weapons) or fertilizer (agriculture and bombs)?
- How to check for Over/Under pricing of goods without an identifiable market price?
- What about Syndications? Can you rely on the lead bank? Should you?

