



Blocked Countries To ensure compliance with all Federal legislation, sanctions and AML regulations and guidance, including the FATF, OFAC and FinCEN, SPC will not open accounts for; disburse or accept funds to or from; or transfer securities to or from customers residing in, a citizen of, or financial institutions located in the following countries:

- Afghanistan (Islamic Republic of Afghanistan)
- Bosnia & Herzegovina
- Central African Republic
- Cuba (Republic of Cuba)
- Democratic Republic of the Congo (formerly Zaire)
- Guyana (Co-operative Republic of Guyana)
- Iran (Islamic Republic of Iran)
- Iraq (Republic of Iraq)
- Laos (Lao People's Democratic Republic)
- Libya (State of Libya)
- Nigeria
- North Korea (Democratic People's Republic of North Korea)
- Somalia (Federal Republic of Somalia)
- Syria (Syrian Arab Republic)
- Uganda (Republic of Uganda)
- Vanuatu (Republic of Vanuatu)
- Venezuela (Bolivarian Republic of Venezuela)
- Yemen (Republic of Yemen)

Enhanced Due Diligence Countries SPC will exercise extra caution and additional due diligence when opening an account for; or disbursing or accepting funds to or from; or transferring securities to or from a customer residing in, a citizen of, or financial institution located in any of the following countries, which present increased risk of money laundering and/or terrorist financing activities:

- Albania (Republic of Albania)
- Algeria (People's Democratic Republic of Algeria)
- Angola (Republic of Angola)
- The Bahamas (Commonwealth of the Bahamas)
- Barbados
- Belarus (Republic of Belarus)
- Botswana (Republic of Botswana)
- Burkina Faso
- Burma (Myanmar / Republic of the Union of Myanmar)



Enhanced Due Diligence Countries (continued)

- Burundi (Republic of Burundi)
- Cambodia (Kampuchea)
- Cameroon (Republic of Cameroon)
- Chad (Republic of Chad)
- Cote d'Ivoire (Republic of Cote d'Ivoire / Ivory Coast)
- Eritrea (State of Eritrea)
- Ethiopia (Federal Democratic Republic of Ethiopia)
- Grenada
- Gambia (Republic of the Gambia)
- Ghana (Republic of Ghana)
- Guinea (Republic of Guinea)
- Guinea Bissau (Republic of Guinea-Bissau)
- Haiti (Republic of Haiti)
- Kuwait (State of Kuwait)
- Latvia (Republic of Latvia)
- Lebanon (Lebanese Republic)
- Lesotho (Kingdom of Lesotho)
- Liberia (Republic of Liberia)
- Madagascar (Republic of Madagascar)
- Mali (Republic of Mali)
- Mauritius
- Mozambique (Republic of Mozambique)
- Mongolia
- Namibia (Republic of Namibia)
- Nepal (Federal Democratic Republic of Nepal)
- Nicaragua (Republic of Nicaragua)
- Niger (Republic of the Niger)
- Pakistan (Islamic Republic of Pakistan)
- Palestinian Territory
- Panama (Republic of Panama)
- Papua New Guinea (Independent State of Papua New Guinea)
- Paraguay (Republic of Paraguay)
- Russia (Russian Federation)
- Sao Tome and Principe (Democratic Republic of São Tomé and Príncipe)
- Serbia (Republic of Serbia)
- South Sudan (Republic of South Sudan)



Enhanced Due Diligence Countries (continued)

- Sri Lanka (Democratic Socialist Republic of Sri Lanka)
- St. Kitts and Nevis (Federation of Saint Christopher and Nevis)
- St. Lucia
- Sudan (Republic of the Sudan)
- Tanzania (United Republic of Tanzania)
- Trinidad and Tobago (Republic of Trinidad and Tobago)
- Tunisia (Republic of Tunisia)
- Ukraine (Crimea is the area of concern. Particular towns to be aware of include: Sevastopol, Feodoisa, Kerch, Yevpatoria / Eupatoria, and Yalta.)
- Zambia (Republic of Zambia)
- Zimbabwe (Republic of Zimbabwe)