



BORD TA' SORVELJANZA DWAR IS-SANZJONIJIET
SANCTIONS MONITORING BOARD
MALTA

Adverse Media

Guidance Note

23 December 2022

Adverse Media

Adverse media otherwise known as negative news is any relevant information which is available through multiple sources such as online articles, press articles, blogs etc. and that may portray a negative impression, data or information on a person or entity. Adverse media is considered to be an important source of information when conducting the necessary due diligence and sanctions screening prior to servicing a client.

Adverse media may help uncover facts and guide persons' judgement prior to onboarding a customer or prior to the onset of a transaction or during the business relationship. Adverse media may shed light on multiple considerations in relation to sanctions such as the indirect ownership or control of companies and/or property of listed persons or entities or connections between a customer and third parties that may be violating or circumventing sanctions. The presence of adverse media is an important red-flag and such information should be positively considered in the assessment of a transaction or situation unless the information can be positively excluded to be false. In case of adverse media, the subject or non-subject person conducting due diligence is encouraged to consult various sources in order to corroborate the information.

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Reference is made to the Guidance note on Non-Subject Persons linked hereunder which refers to the equal obligation on both subject and non-subject persons to ensure compliance with UN/EU and national sanctions at all times. The Sanctions Monitoring Board recommends that both subject and non-subject persons include adverse media in fulfilling their Customer Due Diligence obligations. Adverse media on a client can also impact a decision of a subject or non-subject person to continue the business relationship with a client in view of the negative reputation of the same, even though the information may be unrelated to sanctions.





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The restrictive measures adopted by the European Union and the United Nations, including those on Russia following the aggression against Ukraine, may be consulted on the website of the Sanctions Monitoring Board on <https://foreign.gov.mt/smb>.

It is recommended that all persons in Malta remain informed of any updates made to applicable sanctions. To subscribe to the mailing list of the Sanctions Monitoring Board one may send an email to updates.smb@gov.mt.

Sanctions Monitoring Board

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