How to Use Public Records to Investigate Ships

In May, the U.S. Department of the Treasury, U.S. Department of State, and U.S. Coast Guard <u>issued</u> an advisory on illicit shipping and sanctions evasion practices. Follow these tips to investigate ships and their onshore corporate networks to help mitigate the risk of facilitating sanctions evasion and illicit shipping.

1. Find your ship of interest:

You can search for a vessel using a global shipping database, such as <u>Equasis</u>, or use regional databases like the <u>Tokyo MOU Port State Control</u> database or the <u>Panama Maritime Authority</u>. To ensure you are searching for the correct vessel, it's important to also identify its International Maritime Organization (IMO) number, which is unique to every ship.

2. Check for deceptive shipping practices:

Compare the vessel's registered IMO number with an image of the vessel to verify that the ship has not painted over its IMO number to obscure its identity. Note if a vessel is registered with a flag that does not pertain to its owner or manager's registered country—these "flags of convenience" can help vessel owners dodge regulations in their home country.

3. Identify the ship's owner, commercial manager, and ISM manager:

Every vessel has an owner, a commercial manager, which handles the day-to-day operations of the ship, and an International Safety Management (ISM) manager, which is responsible for meeting safety regulations. Sometimes, a ship owner will designate an offshore shell company as a ship's commercial manager or ISM manager. Identifying these companies can help mitigate risk related to <u>sanctions</u> <u>evasion</u> or <u>illicit shipping</u>.

4. Identify the ship's ultimate beneficial owner:

Bad actors often use shell companies or multiple layers of ownership to hide the <u>ultimate beneficial</u> <u>owner (UBO)</u> of their ships. Cross-reference company names across corporate registries to identify the ship's UBO.

5. Find other ships associated with the UBO:

After you've found a ship's UBO, look for other companies in the UBO's corporate network. Then identify other ships in these companies' fleets— these ships <u>may be at risk</u> of illicit shipping or sanctions evasion.

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