

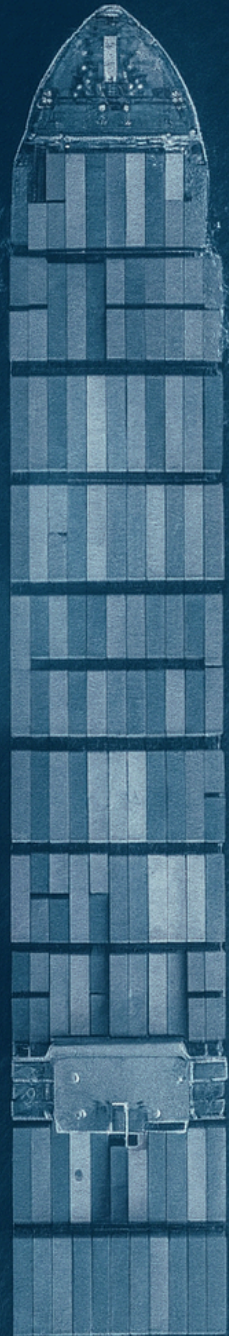
TEVUNA

Discover the Impossible

The Ghost Fleet Economy:

How Hidden Ownership Powers Global Trade and Evades Compliance

www.tevunainsights.com



The Hidden Engines of Global Trade

In boardrooms and compliance offices across the world, it's assumed that due diligence works. That the systems in place—corporate registries, sanctions lists, KYB tools—form a protective net. But beneath the surface of international trade lies a vast, largely invisible infrastructure of ghost fleets, shell entities, and shadow ownership structures that move goods, money, and influence without ever triggering alerts.

This isn't fringe activity. It's baked into the system.

We call this the Ghost Fleet Economy—and it thrives in the blind spots of traditional risk workflows.

Consider this:

- Approximately 17% of oil tankers globally belong to the “shadow fleet” — vessels operating under concealment to evade sanctions (Atlantic Council, 2024).
- Around 12% of global vessels have unknown ownership, often due to proxy registrations or deliberate opaqueness (S&P Global).
- Over 50 national UBO registries remain self-reported or non-verifiable, offering little protection against bad actors.
- In recent OFAC enforcement actions, entities were penalized for risk exposure two to three layers removed from the sanctioned party—connections that registry checks routinely miss.

These threats don't sit outside the compliance perimeter. They're built to pass through it.

This whitepaper dives into:

- Why traditional UBO and sanctions screenings are no longer sufficient
- How sanctioned parties use legal entities and jurisdictional arbitrage to mask control
- The regulatory shift from technical compliance to demonstrable investigative effort
- What a “verified intelligence” standard looks like—and why it's fast becoming the new baseline



The Architecture of Obfuscation



If the Ghost Fleet Economy is the result, obfuscation is the engine behind it.

Whether it's a reflagged vessel, a nominee director in Cyprus, or a shell company registered through a mail drop in Delaware—the goal is the same: separate control from visibility.

This obfuscation takes three primary forms:

1. Shadow Fleets in Action

The Atlantic Council estimates over 600 oil tankers worldwide operate within opaque ownership and tracking structures—using AIS manipulation, mid-ocean ship-to-ship transfers, and frequent flag changes to evade detection.

In early 2024, the European Parliament reported that 42% of Russian seaborne oil moved via such ghost fleets, exploiting loopholes in registry transparency and maritime monitoring.

2. Flags of Convenience

Vessels register in jurisdictions like Liberia, Panama, or the Marshall Islands—not for operational reasons, but for secrecy, tax sheltering, and weak enforcement. This decouples ownership from regulation and shields UBO data from scrutiny.

3. Identity Laundering

Using nominee shareholders, family trusts, and layered corporate chains, sanctioned actors and politically exposed persons create legal walls between themselves and the assets they control. These structures are legal in form, but adversarial in function.

Traditional tools fail not because they're inaccurate—but because they're incomplete.

Tevuna was built to close that gap.

Case Study – When Obfuscation Meets Exposure Background

A publicly traded mining company in South America lost its largest concession—a rare-earth deposit—to a seemingly unrelated rival. The official story: competitive rebidding. But internal teams suspected political interference. Multiple law firms and diligence vendors found nothing. Public registries showed clean ownership. There were no media hits. No sanctions. No PEP flags.

So the client turned to **Tevuna**.



The Investigation

Within minutes, Tevuna's UBO Discovery engine did what others could not:

- Traced the ownership structure of the rival company across four offshore entities in Curaçao, Cyprus, and Panama.
- Flagged a nominee director connected to a political family trust linked to a former president.
- Uncovered payments from one of the holding firms to multiple members of the national mining commission—including a former aide to the president.
- Mapped a pattern of government contracts routed through the same trust network.

No vendor found this. Tevuna did.

The Result

- The intelligence was compiled into a court-grade report with citations, extracts, and chain-of-control visuals.
- Submitted to a U.S. Congressional Committee as part of a corruption complaint.
- Sanctions were issued under the Global Magnitsky Act against the former president and three associates.
- The mining concession was reversed via emergency arbitration, restoring it to the client.

Tevuna didn't find a red flag. It built the case that delivered justice.

Strategic Implications Across Risk Functions

This wasn't just a win for one client—it exposed a systemic vulnerability. And every function across legal, compliance, and investment needs to take note.

Compliance & Sanctions

- **Old Strategy:** Screen names. Tick boxes. Log results.
- **New Imperative:** Identify indirect risk, layered ownership, proximity exposure.

Tevuna enables:

- Real-time exposure mapping to sanctioned individuals
- Court-defensible audit trails showing proactive diligence
- Compliance teams to act like investigators—not passive reviewers

Legal & Litigation

- **Old Strategy:** Wait for discovery. Work backwards.
- **New Imperative:** Build leverage before the suit is filed.

Tevuna delivers:

- Pre-discovery legal intel
- Verified counterparty history
- Clearance Reports to eliminate noise and focus legal spend

Investment & M&A

- **Old Strategy:** Rely on sell-side disclosures and superficial diligence.
- **New Imperative:** Detect hidden control, reputational exposure, ESG red flags—before closing.

Tevuna provides:

- Deep shareholder vetting
- UBO discovery in complex jurisdictions
- Post-deal protection from political, legal, and financial risk

In short: Tevuna empowers risk professionals to win—not just comply.



The New Standard of Risk Intelligence



The world has changed. So must your tools.

Today's adversaries don't wear red flags—they hide behind clean paperwork. And yesterday's registry-based tools can't catch what they're not built to see.

Tevuna is different.

- It investigates autonomously—no prompting, no missed signals
- It doesn't summarize risk—it proves it
- It's not a tool—it's an outcome: a court-ready, regulator-proof, decision-grade report

If your current system passed the last entity that burned you—it's time to upgrade. Run your first Tevuna report—free.

No sales pitch. No delay. Just answers.

Visit **www.tevunainsights.com**

Because the next time a ghost fleet sails into your portfolio...

You'll want Tevuna watching the radar.