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Elevating Due Diligence in
Investment Migration
*Addressing Identity, Source of Funds &
Intelligence-Led Risk Assessment*

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Introduction

This white paper has been developed by the Investment Migration Due Diligence Community of Practice (CoP), a group of practitioners representing leading commercial intelligence firms operating in the due diligence space across multiple sectors, including investment migration. The CoP was established to foster collaboration, share expertise, and articulate best practices in response to the increasingly complex risk landscape facing residency and citizenship by investment programmes collectively known as Investment Migration Programmes.

As international scrutiny intensifies and identity fraud, financial crime, sanctions exposure, source of wealth and funds, and data privacy risks evolve, due diligence providers play a critical role in safeguarding programme integrity. This paper brings together the collective insights of CoP members to set out practical approaches to due diligence that move beyond procedural verification and towards nuanced, intelligence-led risk assessment.

This paper examines four core components of effective due diligence in investment migration, and specifically at the applicant onboarding stage: document review and assessment, discursive human source work, live online interviews, and the role of context in interpreting information gathered through each of these methodologies. Together, these elements illustrate why robust due diligence depends not only on what information is collected, but also on how it is stress-tested, corroborated, and understood in the context of decision-making at the applicant onboarding stage.

A central theme throughout this paper is the importance of context, consistency, clarity, and proportionality. These principles underpin effective due diligence by ensuring that information is not only verified, but properly interpreted, appropriately weighted, and clearly communicated to programme decision-makers.

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Hilton Global Associates is a global investigative due diligence and intelligence firm supporting governments and institutions in high-stakes decisions involving citizenship, capital, and reputational risk, and is widely recognised for its leadership in investment migration due diligence and cross-border investigations. With senior leadership active in the investment migration due diligence sector since 2009, Hilton Global brings deep institutional knowledge of programme evolution and international best-practice standards across jurisdictions. <https://hiltonglobalassociates.com/>

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S-RM is a corporate intelligence and cyber security consultancy founded in 2005. With more than 400 practitioners across offices in Europe, Africa, Asia and North America, the firm supports organisations through intelligence-led strategy, cyber resilience and crisis response. Its multidisciplinary teams combine expertise from government, finance, journalism, intelligence and academia to deliver direct, actionable advice to clients worldwide.

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For over 50 years, Control Risks has been trusted by the world's leading multilateral, governmental and commercial organisations as they enter new markets and make complex, high stakes decisions. Our 5,000 practitioners across 41 global offices deliver internationally bench-marked due diligence assessments and training and market entry support to stakeholders in the investment migration space, enabling them to leverage opportunity and defend decisions in an evolving risk landscape. <https://www.controlrisks.com/>

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Exiger is a pioneer in providing due diligence and technology solutions to the Investment Migration industry. A trusted partner to leading Residency and Citizenship by Investment programmes, Exiger helps practitioners navigate risk and compliance with efficient, cost-effective, technology-enabled solutions. Leveraging proprietary data, advanced AI, and intuitive tools, Exiger surfaces risks, automates compliance, and supports stronger decision-making, programme integrity, and long-term resilience worldwide. <https://www.exiger.com/>

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FACT is a leading UK based provider of due diligence, investigations and intelligence services, supporting organisations, governments and law enforcement globally. With more than 40 years of experience, FACT combines specialist expertise, international reach and local insight to deliver due diligence, complex investigations, IP protection and digital forensics. Our teams provide clear, actionable intelligence with precision and discretion, helping clients manage risk, protect assets and make informed decisions in high-risk environments. <https://www.fact-uk.org.uk>

Document review and assessment

Reviewing and verifying the authenticity, accuracy, integrity, and validity of documents provided in support of an application is a central component of the due diligence process for investment migration programmes. Eligibility, integrity, and risk conclusions rely heavily on the documents submitted by applicants, including passports, civil registry records, corporate filings, litigation documents, and financial materials. If these documents are altered, incomplete, or misleading, the overall risk analysis will be compromised. As a result, document verification is generally approached as a substantive investigative exercise rather than an administrative review.

Verification – what does best practice look like?

The verification of documentation, and the information it contains, encompasses various methodologies, depending on the nature of the information that needs clarification and validation. These methodologies include determining the following:

- **Authenticity** – whether a document is genuine and unaltered.
- **Integrity** – whether the document is complete and has not been tampered with or manipulated.
- **Accuracy of content** – whether the information contained within the document is factually correct.
- **Validity** – whether the document is current, legally effective, and capable of being relied upon for the purpose for which it is being used.

Different verification steps may address one or more of these elements, but they do not all carry the same weight. In practice, verification also extends beyond the assessment of individual documents to include whether the information they contain is coherent and plausible when considered against the applicant's overall profile. For example, confirming that an applicant owns a property or holds a particular asset does not, in isolation, establish that it is consistent with the applicant's declared income, employment history, or broader wealth trajectory.

Not all verification activities address each of these elements. For example, notarisation typically confirms the identity of the signatory rather than the accuracy of a document's contents, its validity, or whether it has been selectively assembled or presented. For this reason, effective due diligence depends on clearly stating what has and has not been verified, how it has been verified, and what remains unverified. This helps avoid overstating the level of assurance provided and allows decision-makers to distinguish between direct confirmation, corroboration, and unresolved uncertainty.

Primary and secondary source verification

Against that backdrop, a structured methodology typically differentiates between primary and secondary source verification, with both playing complementary roles depending on the context and risk profile.

- **Primary source verification** involves validating information directly with the original issuing authority or an official registry, such as confirming corporate ownership through government filings, validating civil status

records through official extracts, or obtaining records from courts and official bodies. This form of verification is generally regarded as the most robust, although it may not always be feasible due to legal and practical constraints.

- **Secondary source verification** draws on independent and reputable sources, including regulatory records, press publications, sanctions and watchlists, adverse media, and commercial databases. These sources can provide valuable corroboration and context, particularly where primary confirmation is not available, although they are not equivalent to direct verification from an issuing authority. The objective is to triangulate key facts, identify inconsistencies, and clearly document how discrepancies were resolved, allowing decision-makers to better understand the basis of the assessment.

Within this framework, transparency around methodology is key. This includes clearly indicating the sources relied upon (primary or secondary), the aspects of verification undertaken (for example, authenticity, integrity, or content accuracy), and any limitations or constraints encountered during the process.

This level of transparency helps ensure that decision-makers understand the basis of the assessment, the degree of confidence attached to particular findings, and any residual uncertainty that remains.

Identity and relationship verification

Establishing identity forms the foundation of effective document verification. This extends beyond confirming that a passport appears authentic. It includes assessing whether the applicant is the legitimate holder of the identity and whether that identity is consistent across jurisdictions and records. Names, dates of birth, citizenship history, and residential information are typically reviewed across submitted documents and independent sources, with any variations examined and supported by credible documentation.

This consideration becomes particularly relevant in cases involving name changes or multiple identities. It is possible for an individual to obtain legitimately issued documents following a legal name change and subsequently use those documents to establish additional credentials under the new identity. In this context, identity verification often requires a more holistic review incorporating historical records, aliases, and cross-jurisdictional linkages, rather than reliance on a single current identity document or record set.

For applications involving dependents, similar principles apply to the verification of family relationships. Marriage certificates, birth records, adoption documents, and custody determinations are typically reviewed for authenticity and consistency and, where possible, corroborated through official registries. Particular attention is given to discrepancies in parental details, dates, or places of birth, as well as to the legal basis for guardianship. This helps confirm that dependents are included appropriately and reduces the risk of misrepresented relationships or improper relocation of minors.

Verification in source of wealth and funds analysis

In the context of source of wealth and funds, verification is often shaped by practical limitations. In many jurisdictions, direct confirmation from financial institutions is not accessible to third-party due diligence firms. As a result, greater emphasis is typically placed on document integrity, reconciliation of declared income with corporate filings and other available records, and assessment of whether the applicant's financial profile appears coherent in light of known business activities. Where verification cannot be completed in full, contextual and methodological limitations, together with any resulting residual risks or uncertainties, are clearly articulated during the due diligence process, to ensure decision-making is transparent and informed.

Limitations and transparency

A document-led approach, in isolation, has inherent limitations. Advances in technology have increased the sophistication with which documents can be falsified or legitimately obtained under alternative identities. For that reason, verification increasingly requires validation of the current accuracy and real-world alignment of information through corroborative record research and analytical review, rather than reliance on the existence of documentation alone.

Overall, effective document verification is characterised by structured methodology, professional scepticism, thorough documentation, and transparency. Verification steps are documented, inconsistencies are escalated in line with defined thresholds, and conclusions are tied clearly to findings. Clear differentiation between levels of verification, combined with open communication of limitations, strengthens the credibility of due diligence assessments and supports the integrity of investment migration programmes.

Interpreting document issuance constraints

Understanding document issuance procedures in the relevant jurisdiction is critical to interpreting apparent anomalies or omissions correctly. For example, the failure to provide a police clearance certificate for a period of prior residency may, depending on the jurisdiction, reflect anything from a genuine access limitation to a more substantive concern. Equally, an affidavit stating the individual is “unable to access” a police clearance certificate cannot necessarily be accepted at face value without understanding how such records are issued and obtained in practice. Depending on the jurisdiction, police clearance certificates may only be available to individuals who apply for them in person, and in other cases, may be obtained through a power of attorney or through remote application processes. In many cases, letters provided by embassies note an absence of known criminal convictions for an individual in a country without being based on a comprehensive check of centralised legal and enforcement records. In other cases, a police clearance certificate may not be obtainable because an individual is required to undertake military service in a jurisdiction where such service is compulsory, even though that service may itself create a threat to life or form the basis for asylum in another context.

Discursive human source work

Human source work plays a pivotal role in adding a final layer of context to the CBI due diligence process. The ability to conduct this type of enquiry in a structured, discreet, and defensible manner increasingly distinguishes intelligence-led due diligence providers from those relying solely on record-based verification. Discursive human source engagement is key to understanding how a business operates in reality, including how it interacts with suppliers, clients and the wider marketplace, and how its beneficial ownership and probity are perceived in practice. Source commentary does not replace documentary verification; rather, it enables programmes to interpret documentary findings within the applicant’s operational, reputational, and jurisdictional context.

At a broad level, human source work encompasses direct enquiries with knowledgeable individuals, rather than reliance solely on digital or documentary research, to obtain insight into an applicant’s background and that of their businesses. This includes targeted reputational enquiries, and contextual assessments relating to real estate or other assets. Sources may

include individuals familiar with the applicant, subject-matter experts within a relevant field, or professionals positioned to comment on sector-specific norms. The value of this work lies in moving beyond information reflected in available record sets to develop a fuller understanding of how an applicant's identity, activities, and reputation are understood in practice, not solely on paper.

Discursive human source engagement is particularly important in jurisdictions where public record systems are not digitised or centralised, are incomplete, or are subject to political influence, and therefore provides important nuance during the due diligence process.

Methodology

A balanced methodology combines clearly defined intelligence requirements with the flexibility to explore broader themes and open-ended lines of enquiry, capturing both targeted insights and wider contextual narratives. This approach produces a more complete and textured picture for the programme decision-makers, particularly where controversies, allegations, or conflicting accounts emerge.

Human source enquiries are most effective when conducted after the majority of documentary and record-based research has been completed. Investigators who are already familiar with the applicant's profile are better positioned to explore relevant lines of discussion, test inconsistencies, and clarify issues arising from earlier findings. At the same time, best practice includes maintaining a consistent framework of standard questions across applications to ensure that key areas – such as legal, regulatory, financial, or reputational exposure – are addressed systematically, supporting consistency across cases and strengthening the defensibility of programme decisions. This structured framework is complemented by additional follow-up questions tailored to the applicant's profile and emerging findings, allowing investigators to pursue relevant lines of enquiry in greater depth where required.

Discursive engagement differs from structured questioning alone. Skilled investigators apply elicitation techniques that allow relevant information to emerge naturally through conversation rather than relying solely on predetermined enquiries. This includes probing for clarity, balance, and grounding where needed, and testing whether positionality or locality may be influencing the answers provided.

A core strength of discursive engagement lies in the ability to identify, select, and confidentially approach credible sources whose perspectives are genuinely relevant to the enquiry. Wherever possible, engagement is conducted directly by investigators so that due diligence providers retain

oversight of source suitability, experience, objectivity, and proximity to the issues under consideration. Direct investigator-led engagement preserves methodological oversight and ensures that source selection, questioning strategy, and interpretation remain aligned with programme risk objectives.

In contrast, reliance on enquiry aggregators or third-party intermediaries – while sometimes unavoidable due to contextual restrictions – can significantly reduce visibility into source credibility and context, and limit the investigator’s ability to guide a conversation, clarify ambiguities in real time, or redirect a line of enquiry where necessary. Maintaining methodological oversight in this way supports both reliability and accountability.

Responsible discursive engagement also requires balancing programme visibility into methodology with the need to preserve source confidentiality and investigator independence. Findings are presented in a manner that supports decision-making without exposing sources to risk or compromising future enquiry capability.

Mitigating Bias

Human source engagement necessarily involves the possibility of subjective or incomplete perspectives. Investigators conducting these enquiries are trained to recognise emotionally charged responses and exaggeration stemming from contextual or personal positionality, and commentary that requires further substantiation. Contacting multiple independent sources on differing sides of an issue or allegation helps establish whether observations are consistent across different perspectives and whether outlying comments remain unsupported.

Not all human sources carry equal weight. Investigators assess source proximity to events, independence from the subject, potential competing interests, and consistency with other available information before determining how commentary should inform the overall assessment.

Investigators can also assess how closely a source is positioned to the relevant events, how well they understand the issues under discussion, and whether their views may be influenced by personal, professional, or cultural factors. This process helps distinguish between fact, inference, and opinion, ensuring that unverified commentary is reported transparently and responsibly. Where appropriate, investigators follow up with additional record-based research to test references emerging during source enquiries. This iterative approach reduces the likelihood that a single perspective could unduly influence conclusions and strengthens the overall reliability of the assessment.

Source commentary is best collected from multiple trusted sources through separate conversations that are not filtered by an external party such as a subcontractor whose own biases and contextual understanding may be unclear or insufficiently disclosed. Understanding the context in which information was provided, the timing and circumstances of the conversation, and the motivations or potential biases of the source helps ensure appropriate weight is given to each statement, particularly where allegations arise or inherent risks are present. Particular attention is given to situations where media coverage is unlikely to be comprehensive or objective, or media interest is lacking, as may be the case for applicants who do not operate in the public spotlight.

Interpreting Commentary

Experienced investigators are also able to recognise patterns across applications and jurisdictions that may not be apparent from a single case in isolation, allowing emerging typologies to inform the interpretation of individual findings. Discursive engagement helps distinguish between genuine risk indicators and structural features of local operating environments, reducing both false positives and false negatives in programme assessments. Where human source commentary introduces credible indicators of undisclosed litigation, regulatory exposure, reputational concern, or identity inconsistency, investigators conduct additional corroborative enquiries before conclusions are drawn.

In some cases, the absence of expected reputational awareness within relevant professional networks can itself be informative. Where credible sources would reasonably be expected to be familiar with an individual or entity but are not, this may support further examination of declared activities or market presence.

Ultimately, where information gathered from human sources contributes to an assessment, due diligence providers clearly communicate the nature of that information and the manner in which it can be interpreted. Verbal commentary is inherently distinct from official records and cannot be treated as equivalent. Whilst discursive enquiries provide valuable jurisdictional insight, due diligence practitioners themselves also serve as interpreters of risk, applying analytical judgement to support informed programme decision-making.

Where human source engagement is omitted entirely from the scope of due diligence, stakeholders may be left with an incomplete understanding of an applicant's profile. Documentation gaps or limited public record footprints may be interpreted without sufficient contextual explanation, and programmes may be required to make decisions without access to insights that would otherwise support balanced risk assessment.

Inductive reasoning in human source enquiries

Source commentary is key not only to establishing an individual's identity, but also to assessing risks of misrepresentation at the company incorporation stage. For example, whether the functional owner of a firm whose corporate records have been provided resembles the individual making the application. Going beyond this, can contacts who supply goods or services to the firm, or purchase from it, attest to its genuine day-to-day operation rather than its existence only on paper? Commentary from parties who have interacted with the business helps build a picture of a genuine, revenue-generating enterprise, rather than a firm, for example, that has been incorporated purely to hold funds generated through other means. In an anti-money laundering context, this is critical, particularly given the relatively low media profile of many applicants and the fact that they operate in, or have financial ties to, jurisdictions with incomplete paper trails.

In many jurisdictions, indications of judicial, investigative and civil society scrutiny are not readily reported in the media, and often only become part of the public domain once a legal judgment is issued, if such records are made public at all. As such, source commentary is key to horizon-scanning and enabling programmes to think proactively about future reputational and other fallout which may ensue once an issue receives retrospective media attention. Likewise, without balanced source commentary from an array of different political perspectives, pinpointing emerging or latent concerns attached to individuals with leverage to circumvent judicial processes would be extremely challenging.

Lastly, assessing the wealth generation trajectory and political exposure of an applicant without engaging in discursive source commentary is incredibly difficult. It is rare to encounter applicants whose wealth generation narrative – which is often rooted in historical transactions or events – is elucidated fully in the public domain, and where this is the case, any such narrative is triangulated against the public interest or other objectives of the media investigation in question. While due diligence firms may include trained journalists in their teams, investigative due diligence methodology differs from journalistic methodology in its focus and attention to specifics. Journalism is principally deductive in its approach and motivated by public interest or the desire to illustrate broader themes. Due diligence, by contrast, is inherently inductive: it begins with the specifics and builds a narrative by assessing patterns and observations arising from those details, as they relate to the individual in question and their wealth generation narrative.

Beyond automation: Nuance and intelligent communication in live online interviews

As investment migration programmes continue to operate in an increasingly complex risk environment, the industry's responsibility to ensure robust due diligence has never been greater. While technology can enhance elements of the verification process, interviews have become a valuable, additional tool for identifying risk, validating personal narratives, and protecting programme integrity.

Online interviews form a crucial component of the due diligence process, and several factors are critical to eliciting useful responses and, consequently, to assessing risk.

The value of skilled interviewers

Trained and highly skilled interviewers are central to the value an interview can provide. Preparation before the interview allows the interviewer to gauge the applicant's apparent risk and identify anomalies, areas of concern, or missing information that will need to be addressed. This will form the basis of the interview alongside the mandatory questions to confirm identity.

Effective due diligence interviews require a delicate balance: confirming identity and clarifying facts without creating an atmosphere of interrogation. A hostile or overly formal approach may distort responses, making corroboration harder. Interviews conducted professionally, and in the applicant's native language, encourage openness and help applicants feel comfortable enough to speak freely. A skilled interviewer can often ascertain information from applicants without the need for multiple or follow-up questions. The environment is not about softening scrutiny; it is about creating conditions where honesty is more likely to emerge.

Maintaining high standards relies on interviewers being trained or experienced in elicitation techniques (not interrogation), recognising deception indicators, understanding non-verbal cues, applying jurisdictional knowledge, and managing sensitive disclosures professionally. While a structured framework is important, it is the interviewer's expertise that ensures depth, nuance, and risk-focused questioning.

The unique ability of trained interviewers to gather 'soft intelligence', information that emerges organically through observation, tone, hesitation, environmental context, or behavioural shifts, is essential. Such intelligence is critical to understanding an applicant's true profile and identifying red flags that are otherwise hard to discern.

Verifying information during the interview

As part of the live interview, applicants are required to show identity documentation. This is a prerequisite and an important part of the identity verification process. Although the interviewer cannot formally verify the document during the interview, sight of the document helps validate that the applicant is presenting as the same individual throughout the process.

To support source of wealth and source of funds declarations, the interviewer may also request sight of the applicant's cryptocurrency wallet and the balance of the declared funds. While this is not definitive attestation of funds, reviewing it live helps identify inconsistencies and strengthens confidence in the information provided.

A live interview helps offset the risk of impersonation (i.e. an individual attempting to imitate or stand in for the applicant) by enabling interviewers to verify identity through real-time interaction and observation. For example, an individual who does not resemble the applicant and appears to rely heavily on written notes, even for basic security questions, would raise immediate concern. Although they may present a genuine passport and would likely 'pass' an automated identity check, a trained interviewer may notice that a third party is coaching them throughout. Subtle behavioural cues and visible nervousness must be understood in context, but, in some cases, may reinforce concerns.

Nuance and adaptive questioning

Technology can assist with identity verification and provide additional layers of confidence, but it cannot replicate the nuance, adaptability, and contextual understanding that a trained interviewer provides. Trained interviewers are able to adapt to unexpected responses in real time, apply contextual understanding, exercise discretion and professional judgement, and 'read between the lines' in ways no automated system can genuinely replicate.

The agility of a skilled interviewer capable of asking additional questions on the spot based on real-time assessment or redirecting the conversation is crucial. This can be relevant in situations where perceived risks have been identified, and it is the interviewer's role to clarify inconsistencies or information. In some cases, applicants can be guarded, offering limited information, and their reactions and responses are used to appropriately judge the line of questioning.

Interviews also enable a "human" assessment of the applicant's source of wealth and funds. In some cases, the applicant may maintain a complex portfolio of financial assets. The one-to-one communication presents an

opportunity for probing questions, and anomalies can often be resolved, or understanding improved, through an interactive question and answer approach. The expertise of skilled interviewers helps distinguish legitimate structures and documentation from true red flags, reducing the risk that normal practice in a given jurisdiction is perceived as suspicious and presented as a risk. In some cases, risk may be heightened through the applicant's inability to recall information or appropriately answer the question. These can be noted as possible risk factors in the overall risk assessment.

In the context of investment migration, where identity and source of funds verification is central to the due diligence process and geopolitical, economic, social and legal context is key to the interpretation of information, decisions require nuanced human assessment. Interviews help to protect programme integrity, uphold international trust, and reinforce the credibility of CBI offerings in an increasingly scrutinised global environment.

Identity verification beyond the paper trail

While documents may emerge from the verification process as authentic, intact, and factually accurate, the identity of the applicant and their relationship to the on-paper profile may still require additional scrutiny. In this context, discreet enquiries about the real appearance, perceived age, background, and reputation of the documented owner of a company, for example, can help confirm that the person presenting the documents is in fact the applicant.

Coupled with intelligent, natural questioning during the interview, including questions that would ordinarily be easy for a person of the applicant's stated generation and social or geographical background to answer, this can help build confidence that the applicant is the genuine holder of the identity, commercial, and probity documents presented, rather than an alternative individual who has acquired them through misappropriation, personal arrangement, or theft.

Consideration of context

Regional patterns and sector-specific typologies often determine how risk indicators present themselves in practice. Without awareness of the evolving techniques used to circumvent regulation in different markets, due diligence can become a rigid tick-box exercise that does not take contextual insight into account. Identifying those differences and recognising early red flags that warrant targeted follow-up is where due diligence is at its most valuable.

Effective context is not static. Regulatory environments, enforcement priorities, sanctions regimes and political risk landscapes evolve. Due diligence providers therefore maintain a current understanding of developments in key jurisdictions, including changes in beneficial ownership transparency, the use of proxies or nominee arrangements, and emerging typologies identified by international bodies. Without this awareness, even experienced practitioners risk applying outdated assumptions to present-day facts.

Context also shapes proportionality. Not every anomaly warrants escalation to the same degree, and not every complexity signals concealment. The role of the due diligence provider is to assess whether a fact pattern is coherent within the applicant's economic, legal, and political environment. This requires judgement, documentation, and a clearly articulated rationale that explains how conclusions were reached.

Context informs understanding, but it does not dilute standards. Where conduct falls outside applicable legal or regulatory frameworks, or conflicts with international obligations, that risk is clearly identified and articulated. Context supports informed decision-making but does not provide cover for conduct that is incompatible with programme integrity.

Incorporating multijurisdictional context

Many investors in the industry have multi-jurisdictional footprints and operate in regions with different regulations. A data point that looks risky in isolation, such as ties to a sanctioned country, offshore structures, or politically exposed relationships, may in fact be unproblematic in context. At the same time, multi-jurisdictional exposure can increase opacity and therefore requires careful mapping. Understanding why an applicant's business spans particular jurisdictions, and whether the structure evolved over time for legitimate purposes is central to a balanced assessment.

Using context to assess source of funds

Context continues to be an essential component when it pertains to exploring the source of funds for an investment. A purely document-driven approach can misinterpret gaps as concealment, whereas context can explain why certain documents don't exist, why transactions were structured in specific ways, and how wealth accumulation aligns with local norms at the time.

Historical context is particularly important when assessing wealth generation trajectories that span decades. Privatisation processes, post-conflict reconstruction, rapid market liberalisation, or periods of weak regulatory oversight may have shaped how assets were acquired.

Reading context through language, humour, and positionality

Humour is a useful example of a theme that evades detection by conventional AI models and information aggregators, and a binary non-investigative approach to document verification and human source work. In many cases, it can only be identified through a nuanced understanding of context and local perspective. For example, does a Facebook thread featuring a back and forth between two friends in which one is accused by the other of being a member of 'Da'esh' or ISIS, raise real terrorist financing concerns? The answer, of course, is in the context. This piece of information alone has very little value unless its positionality and context are interrogated. With careful triangulation of the statement's context through enquiries, and by weighing the risks and mitigants in light of who made the statement, how it was made, and why, it may prove to be ironic humour rather than a genuine risk indicator.

Conclusion

Effective due diligence in investment migration depends on more than the collection of documents or the use of isolated screening tools. Robust assessments are built through the combined use of document review, human source enquiries, interviews, and contextual analysis, each of which contributes to different but complementary insights.

Across these methodologies, a consistent principle which guides due diligence best practice emerges: information is tested, corroborated, and clearly explained. Documents may be authentic but incomplete in context; commentary may be informative but require careful weighting; interviews may clarify or challenge the information already on file. The task of due diligence is therefore to present a balanced assessment that enables sound programme decision-making.



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