



CULMEN
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Sanctions Policies, Tools, and Resources

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A leader in International Security, Logistics, Humanitarian Assistance, and Technology solutions

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Sanctions: An Overview

Purpose of this session

- Focus on International Sanctions Regimes
- Understand EU sanctions
- Understand UK sanctions
- Understand the OFAC sanctions
- Look at resources for each
- Handover to my colleague Neil Watts



International Sanctions: EU

EU's role in global sanctions:

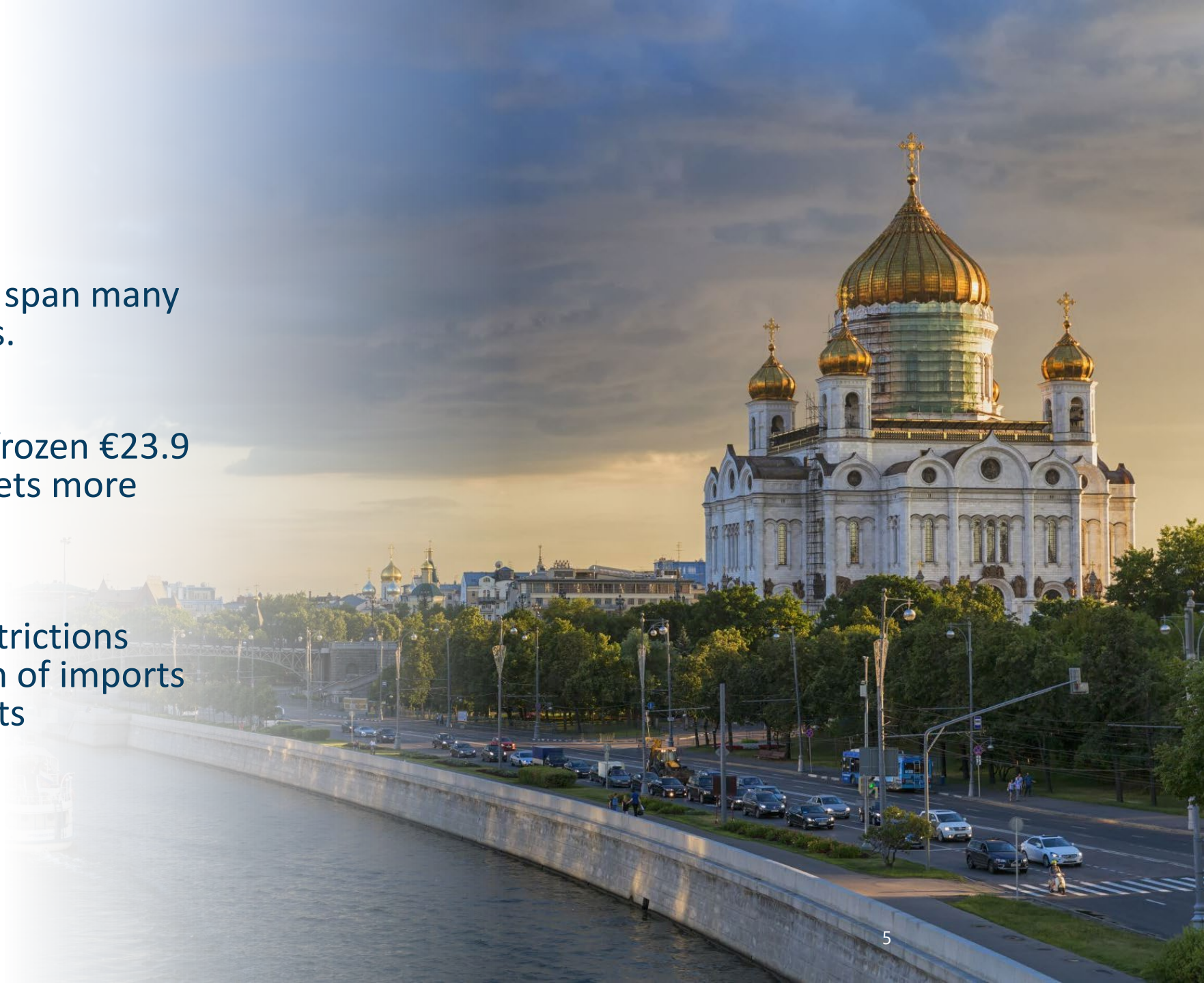
- Second largest sanctioning body after the US, with significant economic and diplomatic influence.
- EU regulations on sanctions are directly applicable in all 27 member states.
- Member states must enact national legislation for enforcement and penalties.
- Each member state designates National Competent Authority (NCA) responsible for sanctions implementation.
- EU sanctions also include UN

EU Sanctions: Types

Economic Sanctions	Individual Sanctions	Diplomatic Sanctions	Transport Sanctions
<ul style="list-style-type: none">- Trade restrictions- Import bans- Export bans- Investment bans- Restriction of capital flow- Financial measures- Banking restrictions- Prohibitions on financial services and other services	<ul style="list-style-type: none">- Travel Bans- Asset Freezes	<ul style="list-style-type: none">- Expulsion of Diplomats- Suspension of bilateral contact- Event boycotts	<ul style="list-style-type: none">- Airspace bans- Port access restrictions- Restrictions via certain routes (maritime etc)

EU Sanctions: Russia

- EU sanctions on Russia span many of the above categories.
- Total individual assets frozen €23.9 billion, €210 billion assets more generally
- Total value of trade restrictions estimated at €48 billion of imports and €91.2 billion exports



EU Sanctions Russia: Overview

Prohibited for Export	Prohibited for Import	Prohibited Services
<ul style="list-style-type: none"> • Cutting-edge tech • Certain types of machinery and transportation equipment • Specific goods and technology needed for O&G, including certain types of storage • Maritime navigation goods and radio communication technology • Dual-use goods • Luxury goods • Civilian firearms, their parts and other army materials • Chemicals, lithium batteries and thermostats • Other goods which could enhance Russian industrial capacities 	<ul style="list-style-type: none"> • Crude oil and refined petroleum products coal and other solid fossil fuels • Steel, iron and pig iron • Cement and asphalt • Copper and aluminum wires, tubes and pipes wood, paper, synthetic rubber and plastics helium • Seafood, spirits, cigarettes and cosmetics • Diamonds and gold, including jewelry • Other goods contributing to the enhancement of Russia's industrial and defense capabilities 	<ul style="list-style-type: none"> • Crypto asset wallets, accounts or custody • Architectural and engineering • IT consultancy and legal advisory • Advertising, market research and public opinion polling • Technical assistance, brokering or financial assistance (in relation to the maritime transport of Russian oil) • Intellectual property rights or trade secrets (related to goods and technology covered by other sanctions) • Software for the management of enterprises • Software for industrial design and manufacture

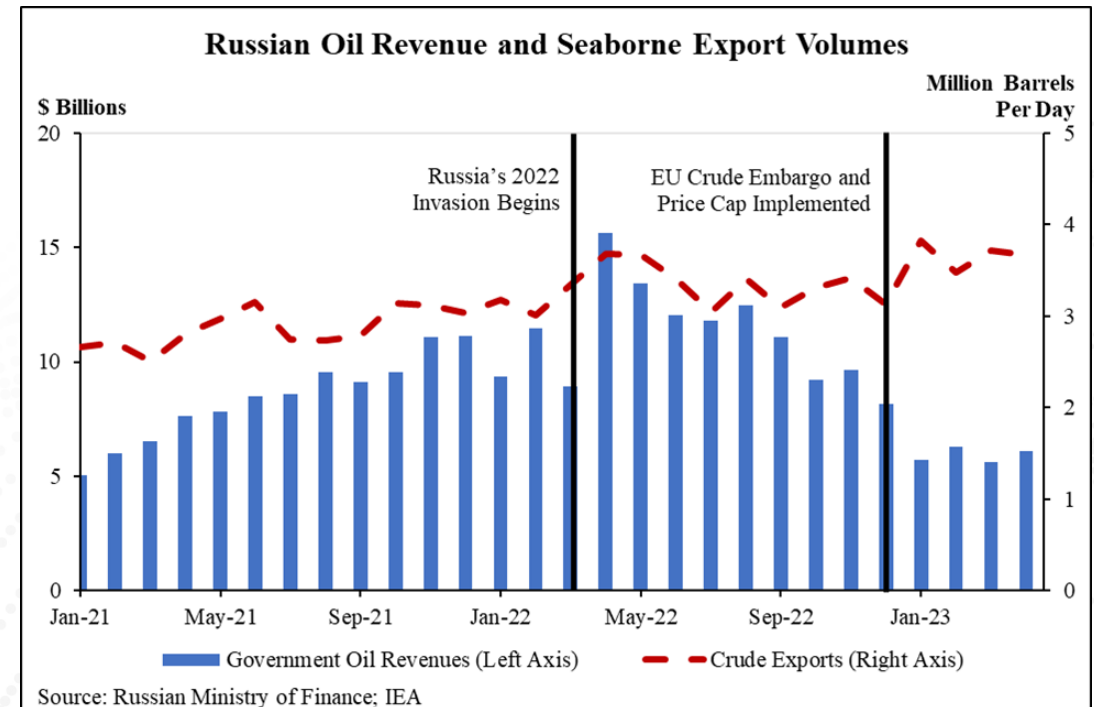
EU Sanctions: Russian Oil

EU Sanctions on oil are complex and multilayered:

- Crude and most refined products banned for EU countries, especially via **maritime routes**
- Some exceptions for pipeline / overland oil transport

The Oil Price Cap:

- Wider scope but not UN (EU + G7 and Australia)
- Other countries can buy oil from Russia at any price
- **But** maritime service providers in the above jurisdictions will **not** provide services to any company / vessel that does not buy oil at above the price cap
- **\$60 / barrel of crude**
- **\$45 / barrel for petroleum products that trade at a discount to crude**
- **\$100/ barrel for those that trade at a premium**



EU Sanctions: No Re-Export

- EU contracts from March 2024 must include this clause:
- Clause applies to countries outside of partner countries
- Aviation
- Jet Fuel
- High Priority Items
 - aerospace
 - firearms etc.
 - Semiconductors, circuits, ball bearings etc.
- Contracts must include “appropriate remedies”
 - Suspend further business, inform authorities

An aerial view of a city skyline, featuring a prominent blue skyscraper with a pointed top (the Lotte World Tower) in the center. The city is densely packed with various high-rise buildings in different colors and styles. The sky is clear and blue.

EU Sanctions: North Korea

Most EU sanctions are carried over from UN measures. Mainly affect:

- **Export and import bans** (e.g. of arms, precious metals, new helicopters and vessels) – includes machinery, transport equipment etc.
- Restrictions on financial support for trade
- Investment restrictions
- A ban on financial assistance
- Compulsory inspections of all cargo going to or coming from the DPRK via land, sea or air
- Suspension of scientific and technical cooperation
- Admission and residence restrictions

EU Sanctions: Risks

- Market Access Restrictions
- Financial Transactions
- Supply Chain Disruptions
- Reputational Risk
- Legal / Compliance Costs
- The EU issued sanctions against an Indian company this year



EU Sanctions: Resources

EU Sanctions Resources:

Information on EU sanctions divided by country can be found at the [EU Sanctions Map](https://www.sanctionsmap.eu/).

The tool allows users to select the country and view an overview of restrictions:

<https://www.sanctionsmap.eu/>



EU Sanctions: Resources

EU Sanctions Tracker:

The [EU Sanctions Tracker](https://data.europa.eu/apps/eusanctionstracker/) allows for search via sanctions regime, entity, etc.

<https://data.europa.eu/apps/eusanctionstracker/>

European Commission

EU sanctions tracker

Monitor latest EU sanctions. Track and navigate the active listings of the asset freezes and travel bans imposed by the EU on individuals and entities.

About Glossary FAQ

RUSSIAN FEDERATION x Search sanctions regimes, nationalities, individuals or entities

Reset

- AFGHANISTAN
Type: Nationality
- ARMENIA
Type: Nationality
- AUSTRALIA
Type: Nationality
- BOSNIA AND HERZEGOWINA
Type: Nationality
- BELGIUM

Sanctioned individuals and entities

The chart shows the number of active listings of individuals (in blue) and entities (in red) by year based on the date a listing first appeared in the consolidated lists. Individuals sanctioned with asset freezes and travel bans are counted only once to produce the actual number of natural persons.

Latest sanctioned individuals

The chart shows the 10 latest sanctioned individuals by date of listing, sanction type (financial sanctions i.e. asset freeze, travel ban), nationality and sanctions regime. The date of listing is usually the same under both sanction types. The chart can be expanded to view all sanctioned individuals chronologically. Hovering over the name shows detailed information about the individual, with the link to the corresponding legal act that contains the listings.

NAME	DATE	NAT	REGIME	TYPE
Oleg Nikolaevich KOZH...	5/31/2024	RU	PRK	F
Viktor Volodymyrovych ...	5/27/2024	RU	UKR	F
Alexander Yurievich GLA...	5/27/2024	RU	RUS	F
Oksana Vasilyevna DEM...	5/27/2024	RU	RUS	F
Ilya Andreevich SAVCHE...	5/27/2024	RU	RUS	F
Elena Sergeevna ASTAK...	5/27/2024	RU	RUS	F
Tatyana Stanislavovna D...	5/27/2024	RU	RUS	F
Evgeny Vladimirovich B...	5/27/2024	RU	RUS	F
Sergey Vladimirovich BL...	5/27/2024	RU	RUS	F
Kirill Sergeevich NIKIFO...	5/27/2024	RU	RUS	F

Show all

Latest sanctioned entities

The chart shows the 10 latest sanctioned entities by their date of listing and sanctions regime. It can be expanded to view all sanctioned entities chronological order. Hovering over the name shows detailed information about the entity, with the link to the corresponding legal act that contains the listings.

There are no entities matching the given search criteria.

Show all

EU Sanctions: Resources

- EU sanctions consolidated database:

<https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions?locale=en>

- EU information on sanctions regimes (sec and def) :

<https://www.consilium.europa.eu/en/policies/?Topic=122231>

- EU Updated Best Practices:

<https://data.consilium.europa.eu/doc/document/ST-11623-2024-INIT/en/pdf>

- Guidance for Russia sanctions implementation:

https://finance.ec.europa.eu/system/files/2023-12/guidance-eu-operators-russia-sanctions-circumvention_en.pdf

- High Priority Items:

https://finance.ec.europa.eu/publications/list-common-high-priority-items_en

- EU Sanctions Regimes:

https://www.eeas.europa.eu/sites/default/files/restrictive_measures-2017-01-17-clean.pdf

International Sanctions: UK



- New sanctions regime post Brexit:
- Sanctions and Anti-Money Laundering Act 2018 (SAML A)
- First post-Brexit sanctions issued in July 2020
- UK is quite active in issuing new sanctions



UK Sanctions: Types

- **SAMLA** gives power to the “appropriate minister” to issue sanctions along certain guidelines
- **Trade sanctions:** The Department for Business and Trade (DBT) implements trade sanctions
- **Financial sanctions:** Office of Financial Sanctions Implementation (OFSI) (part of HM Treasury) enforces financial sanctions
- **Transport sanctions:** The Department for Transport implements and enforces sanctions in the aviation and maritime sectors.
- **Immigration sanctions:** The Home Office implements travel bans

UK Sanctions: Similarities and Differences

- UK sanctions include both UN and all pre-Brexit EU sanctions.
- UK no longer has lengthy 27 country approval process so can issue sanctions more quickly
- In Dec 2023, UK started the new Office of Trade Sanctions Implementation (OTSI)
- Tasked with finding tracking down cases of Russian sanctions evasion



UK Sanctions: Russia / North Korea

- The UK describes Russia sanctions as “the most severe ever imposed on a major economy”
- Imports from Russia to UK have fallen 94%
- Over 2000 individuals sanctioned
- Include multiple restrictions on various chemicals, oil etc.
- UK has issued sanctions packages regularly: as recently as June this year
- Maritime sanctions on oil tankers in Russia’s “shadow fleet” for both oil and weapons
- Sanctions often shared with G7
- “Arms for oil sanctions” on North Korean / Russian vessels / companies
- UK attempting to do some of the work previously done by PoE



UK Sanctions: Risks

- Legal and Financial Penalties
- Asset Freezes
- Prohibition on Business Activities:
- Reputational Damage
- Denial of Access to Financial Markets / Services
- Restrictions on Trade

UK Sanctions: Resources

UK Sanctions Search:

<https://sanctionssearchapp.ofsi.hmtreasury.gov.uk/>

Search for Group results by Group ID

Fuzzy Search is **OFF**

*Enabling Fuzzy search will find matches even when users misspell search terms or enter in only partial words for the search.
Increasing the optional Fuzzy Distance will increase the matches but may make the results less relevant. Increase the Fuzzy Distance in case the exact spelling of the search term is not known.*

Fuzzy Search

Regime: Group Type: Group Status:

Showing page 1 of 1 pages, 1 - 82 of 82 results.

Group ID	Name	Regime	Status	Type	Nationality	Address	Post Zip Code	Country	Date of Birth	Town of Birth	Country of Birth	Position	Passport Details	National Identification Number	Date Listed	Group Last Updated	Other Information
13628	FIRST OIL JV CO LTD	Democratic People's Republic of Korea	Asset Freeze Targets	Entity		Jongbaek 1-dong Rakrang-guyok Pyongyang		North Korea							02/04/2018	01/08/2022	Owner of the DPRK tanker PAEK MA, which was involved in ship-to-ship transfer operations for oil in mid-January 2018. IMO number: 5963351.

UK Sanctions: Resources

- High Priority Items:

<https://www.gov.uk/government/publications/russia-sanctions-common-high-priority-items-list/russia-sanctions-common-high-priority-items-list>

- UK Financial Sanctions List:

<https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>

- UK Sanctions overview:

<https://www.gov.uk/guidance/uk-sanctions>

International Sanctions: OFAC



- OFAC primary sanctions body
- Extraterritorial reach
- Issues many secondary sanctions
- Investigations by DoJ and other US agencies
- Sanctions go beyond UN measures

OFAC Programs:

- **Country Based:**

Balkans, Belarus Burma (Myanmar), Central African Republic , Cuba, Democratic Republic of the Congo, Ethiopia, Hong Kong-Related, Iran, Iraq, Lebanon, Libya , Mali, Nicaragua, North Korea, Somalia, Sudan and Darfur, South Sudan, Syria, Ukraine-/Russia-Related, Venezuela, Zimbabwe

- **Counterterrorism Sanctions Programs:**

Counter Terrorism Sanctions, Foreign Terrorist Organizations, Global Terrorism, Hizballah Financial Sanctions Regulations, Terrorism List Governments Sanctions

- **Counter Narcotics Trafficking Sanctions Programs**

Foreign Narcotics Kingpin Sanctions

- **Non-Proliferation Sanctions Programs**

Non-Proliferation, Weapons of Mass Destruction Trade Control Regulations

- **Thematic Sanctions Programs**

Chinese Military-Industrial Complex, Communist Chinese Military Companies, Countering America's Adversaries Through Sanctions Act of 2017 (CAATSA), Exports of Certain Defense Articles to Countries Supporting Terrorism, Foreign Interference in U.S. Elections Executive Order 13848, Malicious Cyber-Enabled Activities, Vessel-Related Sanctions

OFAC Sanctions: O&G

- Extensive Russian sanctions regime predates Ukraine
- Oil Price Cap and secondary sanctions for breaches
- Extensive sanctions on oil products from multiple jurisdictions
- Sanctions on Russian, Venezuelan, Iranian, North Korean oil sectors

Country	Specific Oil Restrictions
Russia	Price caps on Russian oil to limit revenue while maintaining global energy stability.
	Sanctions against major entities like Sovcomflot, affecting oil transportation above price cap limits.
Iran	Secondary sanctions on non-U.S. entities dealing with Iranian oil to cut down Iran's oil revenue.
	Laws like the Stop Harboring Iranian Petroleum Act (SHIP Act) targeting entities facilitating Iran's oil trade.
Venezuela	Designations of individuals and companies assisting in the sale and transport of Venezuelan oil.
North Korea	Strict prohibitions against exporting petroleum products to North Korea, as part of broader measures to restrict the country's ability to fund its nuclear and ballistic missile programs.
Syria	Prohibits U.S. persons from investing in or purchasing Syrian petroleum or petroleum products. Includes sanctions on entities like Arfada Petroleum and Sallizar Shipping, which are involved in Syrian oil production and refining.

US Sanctions: Risks

Secondary Sanctions:

- No access to U.S. Financial System
- Asset Freezes
- Exclusion from U.S. Commerce
- Investment Restrictions
- Prohibition on U.S. Person Involvement
- Denial of Entry
- Contractual Breaches
- Access to Technology and Equipment
- Shipping and Logistics
- Operational Disruptions

US Sanctions: Resources

- **OFAC SDN List**

<https://sanctionssearch.ofac.treas.gov/>

[Download the SDN List](#) [Sanctions List Search: Rules for use](#) [Visit The OFAC Website](#)
[Download the Consolidated Non-SDN List](#) [Program Code Key](#)

Lookup

Type:

Name:

ID # / Digital Currency Address:

Program:
561-Related
BALKANS
BALKANS-EO14033

Minimum Name Score:

Address:

City:

State/Province:*

Country:

List:

Lookup Results: 208 Found

Name	Address	Type	Program(s)	List	Score
110TH RESEARCH CENTER		Entity	DPRK2	SDN	
ACADEMY OF NATIONAL DEFENSE SCIENCE		Entity	NPWMD	SDN	
AGRICULTURAL DEVELOPMENT BANK		Entity	DPRK4	SDN	
AIR KORYO	Sunan District	Entity	DPRK3	SDN	
AIR KORYO TRADING CORPORATION		Entity	NPWMD	SDN	
AMROGGANG DEVELOPMENT BANK	Tongan-dong	Entity	NPWMD	SDN	
ANDARIEL		Entity	DPRK3	SDN	
BANK OF EAST LAND	PO Box 32, BEL Building, Jonseung-Dong, Moranbong District	Entity	DPRK	SDN	
BLUENOROFF		Entity	DPRK3	SDN	

US Sanctions: Resources

- Other sanctions lists:

<https://ofac.treasury.gov/other-ofac-sanctions-lists>

- Other sanctions info:

<https://ofac.treasury.gov/>

- Trade.gov sanctions search

<https://www.trade.gov/>

- Federal Register

<https://www.federalregister.gov/>

- Congressional Research Service

<https://crsreports.congress.gov/>

Any Questions?

Thanks for your attention!