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# Sanctions Policies, Tools and Resources

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# Sanctions: An Overview

## Purpose of this session

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



A row of European Union flags flying in front of a modern glass skyscraper. The flags are blue with twelve yellow stars arranged in a circle. The building behind them has a grid-like facade of windows.

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



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

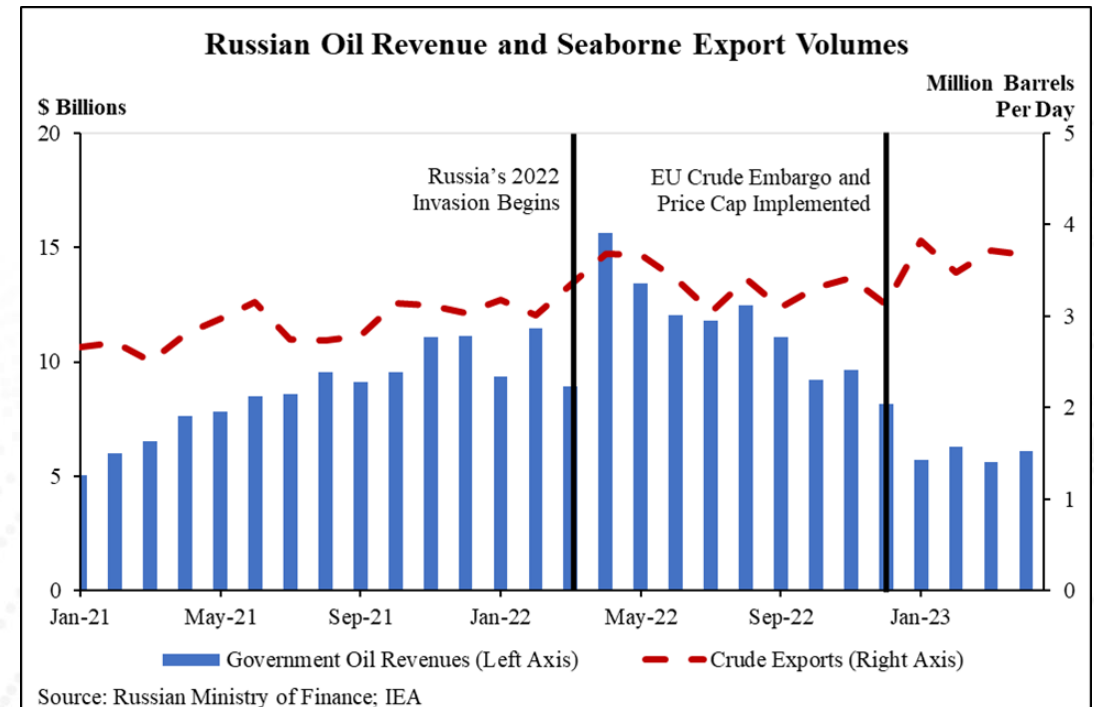
# EU Sanctions: Russian Oil

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 mid-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, immediate termination, penalties



An aerial view of a city skyline, featuring a prominent blue skyscraper with a pointed top. 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

## Prohibited Items:

### 1. Military Equipment:

1. Weapons and ammunition, explosives
2. Combat vehicles and military aircraft, drones etc.

### 2. Nuclear and Dual-Use Goods:

1. Centrifuges and nuclear reactor components
2. Advanced electronics and control systems for uranium enrichment
3. Dual-use goods such as high-speed computers and telecommunications equipment
4. Metals, raw materials

### 3. Items for internal repression



## EU Sanctions: Risks

- Market Access Restrictions
- Financial Transactions
- Supply Chain Disruptions
- Reputational Risk
- Legal / Compliance Costs





# 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/>

**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.

European Commission

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

Reset

**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

**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.

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



# EU Sanctions: Exercise

- Are there EU sanctions on:
  - Russian arms?
  - Venezuelan oil?
  - North Korean textiles?
  - Libyan vessels?
- How many EU designations on Afghanistan are there?
- What is JSC Saturn?

# 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
- 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>



# UK Sanctions: Exercise

- Are any Kuala Lumpur residents designated by the UK?
- Find a list of vessels sanctioned by the UK related to North Korea's oil trade
- Find designated companies involved in North Korea's coal trade
- What sanctions regime is Highland Gold Mining designated under?
- Are lasers on the UK High Priority List?

# 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



# US Sanctions: Iran

## Comprehensive set of sanctions related to Iran:

- **Economic / Trade Sanctions:** Comprehensive trade embargo
- **Energy Sector:** Sanctions on Iran's oil and gas industry
- **Financial Sector:** Restrictions on Iranian banks and financial institutions
- **Military and Dual-Use Items:** Embargo on arms sales to Iran
- **Nuclear Program:** Sanctions targeting Iran's nuclear program and related activities
- **Ballistic Missile Program:** Sanctions on entities involved in Iran's ballistic missile program
- **Metals and Mining:** Sanctions on Iran's metals industry (iron, steel, aluminum, copper)
- **Construction and Manufacturing:** Sanctions on Iran's construction and manufacturing sectors
- **Shipping and Transportation:** Sanctions on Iran's shipping industry and port operators
- **Carpets and Foodstuffs:** Restrictions on imports of Iranian-origin carpets and foodstuffs

# US Sanctions: Export Controls

**US Export Controls** are regulations that govern the export of goods, technology, and services from the United States to other countries.

**Key Aspects: Export Administration Regulations (EAR) – Bureau of Industry and Security (BIS)**

**Controls the export of dual-use items**

- **Aircraft parts**
- **Encryption software**
- **Advanced electronics**
- **Certain chemicals**
- **Telecommunications equipment**

These items are listed in the Commerce Control List (CCL), and depending on the item and its end use, an export license may be required.



# US Sanctions: Export Controls

## International Traffic in Arms Regulations (ITAR) – Directorate of Defense Trade Controls (DDTC)

The **ITAR** covers the export of military-related goods and defense articles. Items that fall under ITAR include:

- Weapons and ammunition
- Missile technology
- Military vehicles
- Combat aircraft
- Satellite systems

Items on the **US Munitions List (USML)** require export licenses, and unauthorized transfers of these items can result in severe penalties.

# US Sanctions: Export Controls

## 1. Identify controlled goods:

- high tech, dual use, defense
- ensure correct documents / licenses

## 2. Prohibited end use destinations:

- sanctioned countries, end users

## 3. Re-exports

- ensure US origin goods not being re-exported to sanctioned countries

## 4. Inspections

- restricted items, verify licenses, report suspicious activity

## 5. Diversion

- Vigilant of cargos leaving ports and then diverting to sanctioned countries



# 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:       Address:

Name:       City:

ID # / Digital Currency Address:       State/Province\*:

Program:       Country:       List:

Minimum Name Score:       Search      Reset

**Lookup Results: 208 Found**

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



# US Sanctions: Resources

- Other sanctions lists:

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

- EAR and CCL

<https://www.bis.gov/ear>

- BIS Red Flags

[https://www.bis.doc.gov/index.php?option=com\\_content&view=article&id=51&catid=23](https://www.bis.doc.gov/index.php?option=com_content&view=article&id=51&catid=23)

- CCL List

<https://www.ecfr.gov/search>

- Consolidated Screening List

<https://www.trade.gov/consolidated-screening-list>

- The United States Munitions List

<https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M/part-121>

# US Sanctions: Exercise:

- How many designated entities and people in Dalian?
- How many Venezuelan vessels are designated by OFAC?
- How many DPRK vessels are designated by OFAC under DPRK4?
- Who is registered at Room 301, Unit 1; No. 129 Jiangcheng Street; Yuanbao District, Dandong?
- What are the aliases for KOMID?
- Is a customer willing to pay cash for an expensive item a BIS red flag?



# Specific Categories:

## Specific Item Categories to Be Aware Of:

### 1. Oil and Gas Products:

1. Crude oil, refined petroleum, oil rigs, equipment If a shipment contains **oil exploration tools** or **pipeline technology**, should flag it for further review under **UN, EU, UK, or US sanctions**.

### 2. Metals and Machinery:

1. **Steel, aluminum, copper** products, and related **machinery** are heavily restricted. Shipments involving **metal processing equipment** or **metal-based goods** destined for sanctioned destinations need verification to ensure compliance with **UN, US, EU, or UK regulations**.

### 3. Luxury Goods:

1. Items like **luxury vehicles, watches, jewelry, and designer goods** are banned from export to **Iran / North / Russia Korea** If a shipment contains such items, even if they are mixed with non-luxury goods, should ensure that proper sanctions checks are performed.

### 4. Dual-Use Technology:

1. Any shipment containing **advanced electronics, satellite components, or encryption devices** should be closely inspected. Must ensure that these items do not fall under the **dual-use** category, which is heavily regulated across multiple sanctions regimes.

### 5. Weapons and Military Items:

1. **Ammunition, missile parts, and firearms** are strictly banned. If military goods are suspected, must flag the shipment immediately.

# Quick Quiz

**Statement 1:** All UN member countries must comply with UN sanctions.

**Statement 2:** The US only rarely issues secondary sanctions.

**Statement 3:** The EU sanctions only apply to countries within the European Union.

**Statement 4:** UK sanctions no longer align with EU sanctions after Brexit.

**Statement 5:** Here in Malaysia, you don't need to worry about US sanctions even if you are not dealing with US companies.