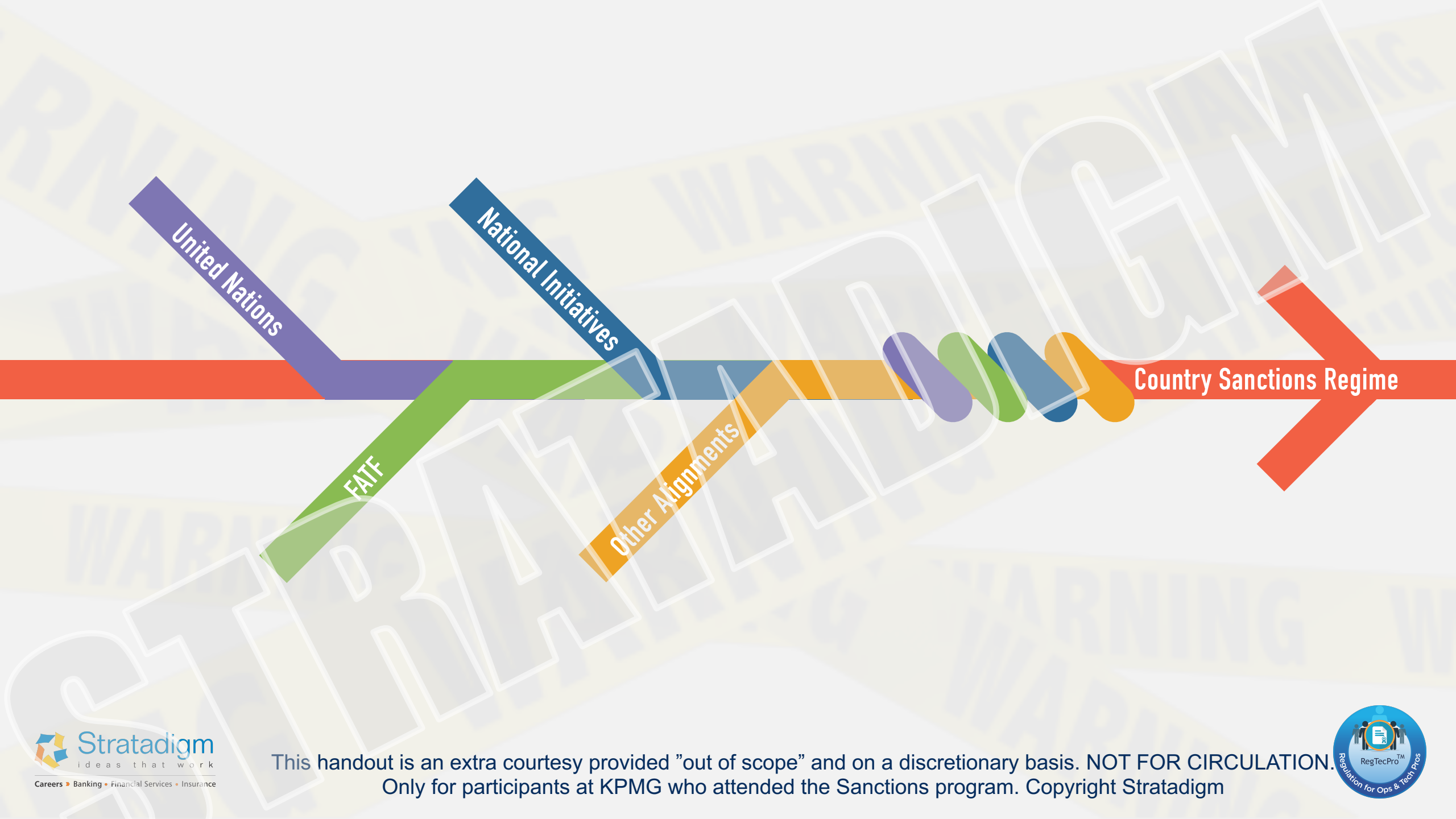


The Sanctions Framework



United Nations

National Initiatives

FATF

Other Alignments

Country Sanctions Regime

Country Sanctions Regime

Primary Sanctions

No exceptions

General License

T & C

Specific License

T & C

Secondary Sanctions

No exceptions

De-listing

T & C

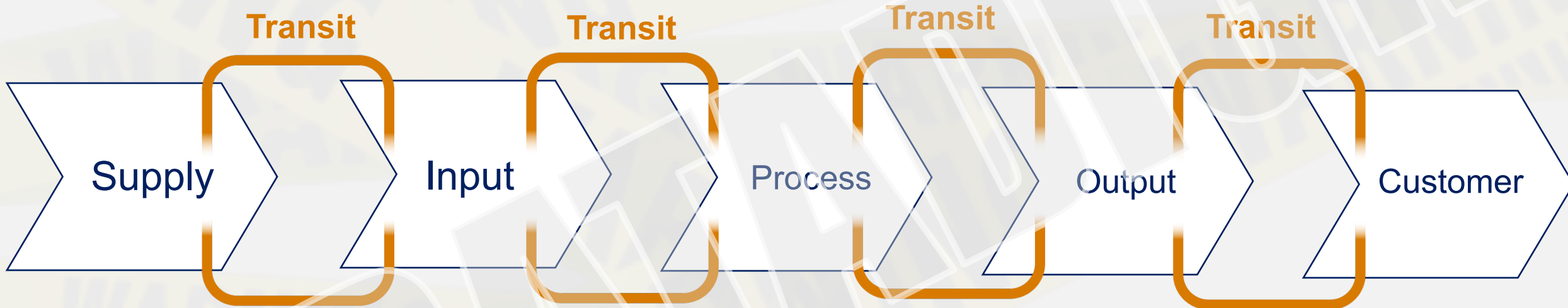
	USA	UK	CAN	EU	Japan
US Alignment					
General Licensing	✓	✓	✓	✓	
Specific License	✓	✓	✓	✓	
De-listing DP Challenges	✓	✓	✓	✓	
Ring-fencing		✓			
“Block”, Freeze, Impound	✓	✓	✓	✓	
Legal Services	✓	✓	✓	✓	
Emergency, Extraordinary Needs	✓	✓	✓	✓	
Normal Living Expenses	✓	✓	✓	✓	
Diplomatic Missions	✓	✓	✓	✓	
Existing Arrangements	✓	✓	✓	✓	

Not Legal Advice!
A quick glance shows concepts are common across regimes; applications vary, for sure.



Simple Chains

Nothing in the value chain of a business should touch a Sanctioned Entity



Nor should the transits associated with the value chain touch a Sanctioned Entity



Foreign, Commonwealth & Development Office

UK Government Policy on Sanctions is guided by the FCDO. It takes into account multilateral (UN; OECD) considerations; and bilateral issues: UK-US; UK-EU

Policy Inputs



Office of Financial Sanctions Implementation
HM Treasury



Department for International Trade

Defence & Security Organisation



Export Control Joint Unit

Administration & Implementation of Sanctions

Licensing

Penalties for breaches

Administration & Implementation of Trade Sanctions & Embargoes

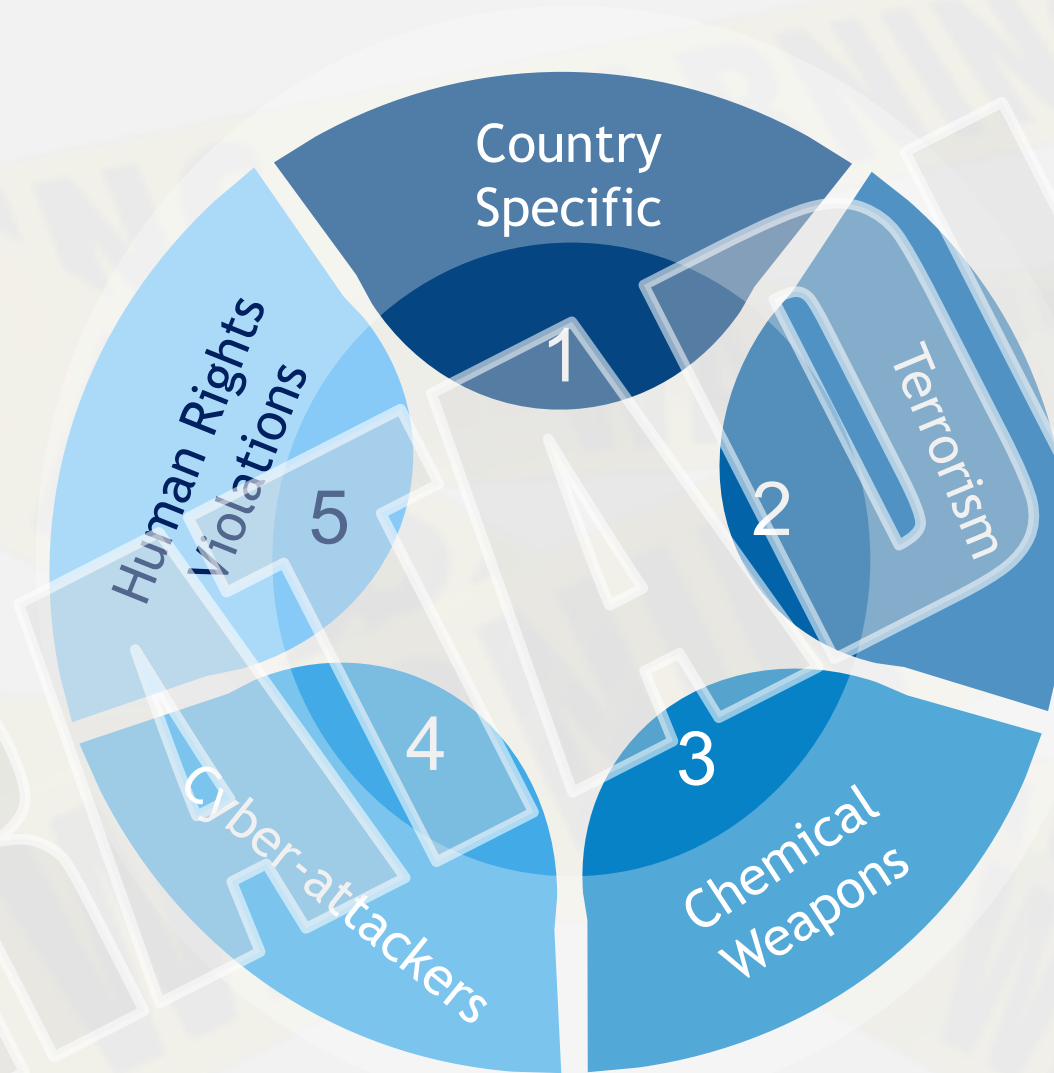
Regulates, administers the Trade Regime

Licenses military / dual use

This handout is an extra courtesy provided "out

Licences may be needed from OFSI as well as from the ECJU.

EU Principal Sanctions Regimes



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1

Asset Freezes

2

Visa Bans

3

**Dual-use item
restrictions &
Arms Embargo**

4

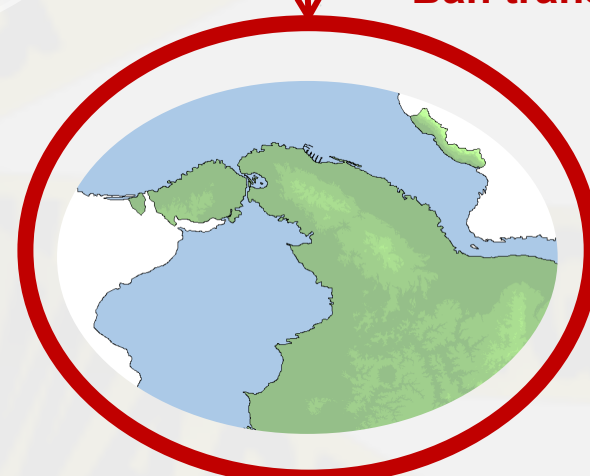
**Sectoral Trade &
Investment
Restrictions**



Careers

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KPMG who attended the Sanctions program. Copyright Stratadigm





Ban transactions

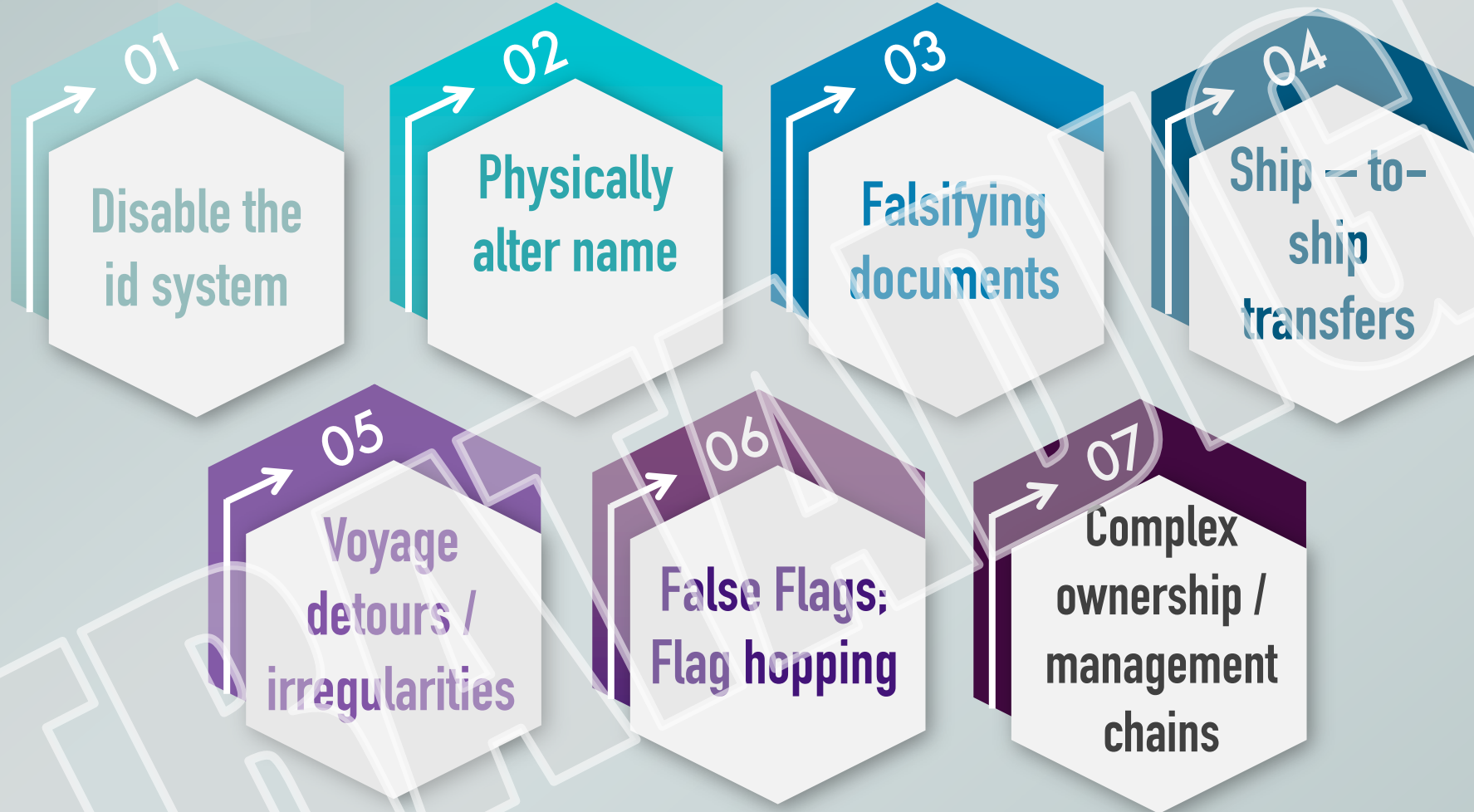
Ban people

Ban products

Isolate them into compliance.

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Guidance on Techniques to Conceal Shipping Identity





Digital Space

Websites, Chat clients, Access to listing of services, Search, Facilities necessary for internet freedom; with limitations



Publishing

This is a corollary to 'internet freedom'; it is to promote the sharing of thoughts and opinions



NGOs

Humanitarian, food aid, etc.



Aircraft

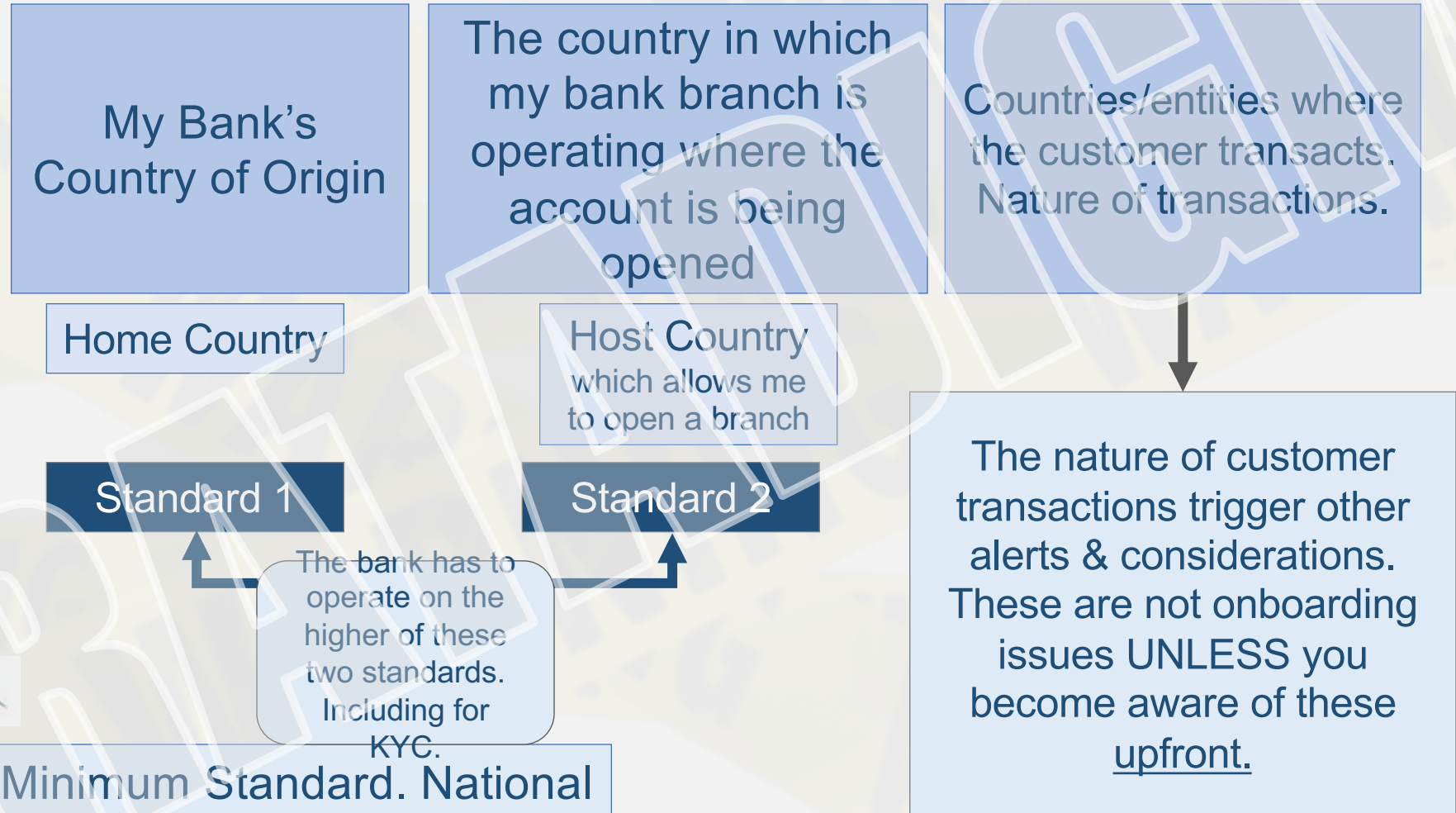
To keep civilian aircraft safe; and parts not eligible for multiple use.



Medical Supplies

There is a general license. But certain formulations require specific, special approval.

Competing & Varying Standards



FATF sets a Global Minimum Standard. National Standards can only be higher: not lower

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Stories Shared!

- ✦ Afghanistan: impact of sanctions on ordinary people
- ✦ BNPP Case of the girl killed in a bomb attack in Jerusalem
- ✦ Assad's wife and the travel ban
- ✦ Russia & Ukraine
- ✦ Standard Chartered, Sberbank
- ✦ North Korea Ship to Ship Transfers
- ✦ Crimea, Crimean Ports
- ✦ Skripal poisoning
- ✦ Navalny poisoning
- ✦ Iran CSE Transtel Case
- ✦ South China Sea territorial disputes
- ✦ Uyghur, Xinjiang
- ✦ Trading hubs: Singapore, HK, DxB
- ✦ ZTE Telecom
- ✦ Sita Travel Agency Systems
- ✦ Oleg Deripaska
- ✦ Northstream & Southstream
- ✦ Dangdon – Sinujiu
- ✦ Iran plane crashes
- ✦ IRGC & Suleimani
- ✦ MahanAir
- ✦ Myanmar Rohingya
- ✦ Gems, Minerals, Rare Earths
- ✦ Alcon Pharma
- ✦ Eilman Pharma
- ✦ Kharg Island oil terminal insurance
- ✦ Schlumberger, Halliburton etc.
- ✦ ABLV Bank