



Checklists of Foreign Countries Subject to Sanctions

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About the Firm

Thompson Coburn LLP's International Trade attorneys counsel clients in the legal aspects of shipping goods, services and technologies across international borders. We regularly advise clients on customs compliance and export controls, foreign investment, international finance, immigration and the protection of intellectual property rights. Our attorneys regularly represent clients before the related agencies under the U.S. Department of Homeland Security, the U.S. Department of Commerce, the U.S. Department of the Treasury and the U.S. Department of State, as well as the U.S.

International Trade Commission, the Office of the U.S. Trade Representative, the U.S. Congress and international bodies.

Since the firm's founding in 1929, we have represented clients from nearly every industrial and corporate sector, including energy, banking, transportation, manufacturing and communications. Now, with more than 380 attorneys and 50 practice areas, we continue to serve clients throughout the United States and abroad.

Countries Subject to Various Restrictions by the U.S., EU, and UN

The following are checklists of countries that are subject to a variety of U.S. and EU-imposed restrictions affecting international trade. The countries are grouped into different categories based upon their nature; several of the countries are subject to more than one category of restriction. Although there is considerable overlap between the U.S. and EU checklists, the restrictions applicable to a particular country may differ significantly. Explanatory notes following the two checklists describe the different categories of restrictions for each.

The last page describes sanctions mandated by UN Security Council resolutions and also sets forth

information regarding sanctions implemented by certain other countries.

Please note: *The attached checklists are intended to alert users to possible issues involving transactions with the named countries or designated persons. They are not intended to constitute, or substitute for, legal advice. Because sanctions programs are subject to change, it is important to review, in advance, any planned dealings with sanctioned countries or persons.*



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Sanction News

February 4, 2019	The EU Council issued a press release stating, in part, that the EU remains committed to the JCPOA despite the withdrawal of the United States from the agreement in 2018. Iranian ballistic missile activity, and its support of disruptive non-state actors in Syria and Lebanon, among other locations, remain a concern to the EU Council.
January 28, 2019	The U.S. Department of Treasury announced a determination, made in conjunction with the State Department, that persons operating in Venezuela's oil sector are subject to sanctions pursuant to Executive Order (EO) 13850. In conjunction with this determination, the Department of the Treasury's Office of Foreign Assets Control (OFAC) published new and amended general licenses related to conduct in Venezuela, and added Petróleos de Venezuela, S.A. (PdVSA) to the SDN list, significantly impacting the Venezuelan economy and, particularly, U.S. persons doing business with Venezuela's oil sector.
January 27, 2019	OFAC announced removals of three entities (EN+ Group PLC, JCS Eurosibenergo, and United Company RUSAL PLC), due to actions those company took to divest ownership from sanctioned Russian individuals. The removal of these SDNs at the same time as the expiration of certain general licenses to transact business with them triggered a reporting requirement for the applicable sanctions period.
December 21, 2018	The EU announced Council Decision (CFSP) 2018/2078, extending its sanctions and restrictive measures targeting Russia for an additional six months.
November 27, 2018	President Trump signed EO 13851, blocking property of certain persons contributing to violence in Nicaragua. Two individuals were designated under the program.
November 4, 2018	As a consequence of President Trump's May 8, 2018, announcement of the discontinuation of U.S. participation in the JCPOA, the 180-day winddown period concluded, ending all remaining U.S. relief specified in the JCPOA, particularly such relief pertaining to sanctions on: Iran's port operators, shipbuilding, and shipping sectors; petroleum-related transactions, including those with NIOC, NICO, NITC, and including the purchase of petroleum and related products. Pre-JCPOA U.S. primary and secondary sanctions in these remaining areas now return into force. OFAC published additional FAQs related to the end of the 180-day wind-down period and the re-imposition of U.S. sanctions lifted or waived as part of the JCPOA. Over 700 persons were designated or identified and added to the SDN List, including persons who had been removed from the SDN List in connection with the JCPOA. Additionally, persons and associated blocked property previously identified on the EO 13599 List were been moved to the SDN List. The wind-down license for General License H also concluded.
October 25, 2018	OFAC designated Singapore-based Tan Wee Beng, Wee Tiong (S) Pte Ltd., and WT Marine Pte Ltd., pursuant to EO 13551, for activities including money laundering, counterfeiting of goods or currency, bulk cash smuggling, narcotics trafficking, and/or other illicit economic activity involving or supporting the Government of North Korea or its senior officials.

October 24, 2018	OFAC issued Belarus General License 2F, extending permission to transact with nine major Belarus state-owned entities (and their 50% or greater owned subsidiaries) until October 25, 2019. Transactions seeking cover from the General License must satisfy a reporting requirement with OFAC if the transaction exceeds \$50,000 (individually or in aggregate).
September 20, 2018	President Trump issued EO 13849, authorizing a menu of sanctions consequences related to the implementation of portions of CAATSA (specifically, sections 224(a)(2), 231(a), and 233(a)). OFAC issued additional Russia-related Frequently Asked Questions to supplement guidance on CAATSA and related implementation.
August 8, 2018	The U.S. State Department notified Congress of the United States’s invocation of Chemical and Biological Weapons Control and Warfare Elimination Act of 1991 (CBW Act) sanctions on the Russian Federation for its use of chemical or biological weapons (“Novichok” nerve agent) in violation of international law against its own nationals. The sanctions include restrictions on foreign assistance, arms sales and related financing; denial of US government credit or financial assistance; and exports of national security-sensitive goods and technology. A second wave of sanctions, including a menu of six sanction options (of which the President must select three) that involve restrictions on multilateral development bank assistance, bank loans, further export restrictions, import restrictions, diplomatic relations, and commercial aviation, have yet to be invoked as of February 2019.
August 6, 2018	As a consequence of President Trump’s May 8, 2018, announcement of the discontinuation of U.S. participation in the JCPOA, a 90-day wind-down period concluded, ending certain relief specified in the JCPOA pertaining to sanctions on: Iran’s trade in gold or precious metals; the direct or indirect supply of graphite, certain metals, or integrated industrial software; significant transactions related to Iranian Reals; the purchase or dealing in Iranian sovereign debt; and Iran’s automotive sector. Pre-JCPOA U.S. primary and secondary sanctions in these areas returned into force. The wind-down license for General License I also concluded.
July 19, 2018	OFAC issued an additional General License (No. 5) regarding certain PDVSA bond transactions in Venezuela and two additional FAQs regarding the scope of permissible conduct in Venezuela.
July 13, 2018	The Department of Commerce issued an order terminating the previous Denial Order, issued on April 15, 2018, against Zhongxing Telecommunications Equipment Corporation (ZTE) and ZTE Kangxun Telecommunications Ltd., ending a lengthy and high-profile violations case against the Chinese company. ZTE disclosed earlier in 2018 that it had made false statements to BIS, triggering the Denial Order in April. The parties subsequently agreed to enhanced settlement terms and a payment of over \$1 billion.

Sanction News

June 28, 2018	OFAC revoked Iran-related General Licenses H and I, which were originally issued in connection with the JCPOA. General License H authorized U.S.-owned foreign subsidiaries to do business with Iran under specific circumstances. OFAC also amended the Iranian Transactions and Sanctions Regulations, 31 C.F.R. Part 560 (ITSR), in order to narrow the scope of certain general licenses. A brief wind-down period (August 6, 2018, for transactions previously authorized under General License I, and November 4, 2018, for transactions previously authorized under General License H) was announced to enable termination of Iranian activities. The U.S. has also suggested secondary sanctions on EU companies are a possibility following the expiration of any applicable wind-down periods.
June 28, 2018	OFAC announced removal from the Code of Federal Regulations the Sudanese Sanctions Regulations as a result of executive actions earlier in the year.
May 8, 2018	President Trump announced that the U.S. would withdraw from its participation in the JCPOA that lifted many international sanctions on Iran in exchange for a series of conditions limiting its ability to pursue a nuclear weapon. The decision means that U.S. sanctions on Iran that were lifted as part of the JCPOA will “snap back” into place following any applicable wind-down periods (90- and 180-day wind-down periods were announced for different activities), in addition to the sanctions that remained in force following the JCPOA implementation.
April 23, 2018	OFAC issued new and updated general licenses extending the wind-down license for a subset of the April 6 designated Russian entities, along with several additional FAQs regarding the affected or designated entities.
April 6, 2018	OFAC designated a number of Russian individuals and entities, including several prominent oligarchs with large investment portfolios and ownership interests in major global organizations. OFAC also issued several new FAQs and general licenses to permit the maintenance and wind-down of activities with affected or designated entities. The general licenses require a pre-April 6 agreement and reporting obligations at the conclusion of the license period.
March 29, 2018	The UK government proposed to maintain its cooperative relationship with the EU from a sanctions perspective, both formally and informally, post-Brexit.
March 19, 2018	The President issued EO 13827, Taking Additional Steps to Address the Situation in Venezuela, and OFAC made additional designations of Venezuelan persons in conjunction with the EO, which primarily addressed attempts by Venezuela to use the issuance of a digital currency to circumvent U.S. sanctions.

March 1, 2018	OFAC announced the amendment and reissuance of the North Korea Sanctions Regulations, 31 C.F.R. Part 510, in order to implement EO 13687, EO 13722, and EO 13810, and to reference the North Korea Sanctions and Policy Enhancement Act of 2016 and the Countering America's Adversaries Through Sanctions Act of 2017. All property and interests in property of the Government of North Korea and the Workers' Party of Korea are blocked, and U.S. Persons are generally prohibited from transacting with them without OFAC authorization.
February 26, 2018	The European Union (EU) increased its sanctions on the North Korean regime to align with UN Security Council Resolution 2397 (2017), including caps on refined petroleum products, bans on additional major categories of imports from and exports to North Korea, and additional maritime restrictive measures.
February 23, 2018	U.S. Department of Treasury, Office of Foreign Assets Control (OFAC) announced additional sanctions measures against North Korea, targeting shipping and trade entities, and released a trade bulletin identifying sanctions circumvention strategies employed by North Korea.
January 26, 2018	The U.S. Government made redesignations and identifications of Russian individuals required by the Countering America's Adversaries Through Sanctions Act (CAATSA). The Trump administration declined to further restrict Russian defense and intelligence entities already identified.
January 22, 2018	The EU added Venezuelan Government officials to its Venezuela sanctions list with Council Decision (CFSP) 2018/90, Council Implementing Regulation (EU) 2018/88.
December 21, 2017	The EU adopted Council Decision (CFSP) 2017/2426, to extend sanctions targeting Russian financial, energy and defense sectors until July 31, 2018.
December 21, 2017	OFAC added five individuals to the Magnitsky Act list, bringing the total number of individuals blocked under the program to 49. The Magnitsky Act targets individuals connected to the detainment, torture, and death of a Russian lawyer-turned-whistleblower who exposed state fraud and corruption.
November 13, 2017	The EU adopted an arms embargo and the structure to implement asset freeze and travel-related sanctions on targeted individuals in the Venezuelan Government per Council Regulation (EU) 2017/2063 and Council Decision (CFSP) 2017/2074.
November 8, 2017	OFAC amended the Cuban Assets Control Regulations, 31 C.F.R. Part 515 (CACR), to implement President Trump's June 2017 National Security Presidential Memorandum regarding policy toward Cuba. The regulatory changes are intended to divert economic activities away from Cuban military, intelligence, and security services, but explicitly maintain opportunities for Americans to travel to Cuba and support private small business there.

Sanction News

October 31, 2017	In accordance with Section 223(d) of CAATSA, OFAC amended Directive 4 of its Sectoral Sanctions program. Directive 4 now prohibits the provision of goods, technology, and non-financial services to deepwater, Arctic offshore, or shale projects in any location where a listed entity has a 33% or greater ownership interest. The delayed effective date of this modification was January 29, 2018, and OFAC published new and updated FAQs relating to the amendment. Additionally, OFAC published new FAQs related to CAATSA Sections 223(a), 226, 228, and 233
October 24, 2017	OFAC issued Belarus General License 2D, extending the authorization to conduct business with certain state-controlled designated entities, in conjunction with the U.S. Department of State. The License expires April 30, 2018, unless extended.
October 16, 2017	The EU restated its commitment to the implementation of the JCPOA following President Trump's decision to not certify Iran's continuing compliance with the JCPOA.
October 12, 2017	The U.S. revoked certain Sudan and Government of Sudan sanctions, pursuant to Executive Order (EO) 13761, as amended by EO 13804. OFAC published new FAQs regarding this revocation, as well as a new general license authorizing certain transactions pursuant to the Trade Sanctions Reform and Export Enhancement Act of 2000. This action does not affect OFAC sanctions related to the conflict in Darfur, which were imposed pursuant to EO 13400 pursuant to the national emergency declared in EO 13067.
September 29, 2017	The EU acted (Council Decision (CFSP) 2017/1775) to implement UN Resolution 2374 permitting sanctions with respect to those threatening Mali's peace agreement.
September 29, 2017	OFAC amended Sectoral Sanction Directives 1 and 2 pursuant to Title II of CAATSA, with a delayed effective date of November 28, 2017. Among other changes, the amendments shortened the maturity window of Directive 1 debt to 14 days and Directive 2 debt to 60 days. OFAC also published updated FAQs relating to the amended Directives.
September 21, 2017	President Trump issued EO 13810 on September 20, 2017, imposing additional sanctions on North Korea following an escalation in regional tensions. The measures target banks and other financial institutions that enable the country's WMD capabilities. OFAC concurrently released new and updated FAQs along with new General License 10 and revised General License 3-A.
August 24, 2017	President Trump issued EO 13808 extending the measures against Venezuela to prohibit transactions, financing for, and dealings in debt (greater than 30 days maturity), bonds, and dividend payments of the Government of Venezuela, and debt of Petroleos de Venezuela, S.A. (PdVSA) (greater than 90 days maturity), among other restrictions aimed at diminishing the Venezuelan Government's access to U.S. currency. The action follows increasing instability in the country and the ongoing actions of the controversial Constituent Assembly to revise core democratic aspects of the Venezuelan Government. OFAC previously designated high-ranking members of the Venezuelan Government in July and August 2017.

August 2, 2017	CAATSA became law (PL No. 115-44). The law codified some existing sanctions on sectors of the Russian economy and defense industries, and imposed additional economic sanctions on Russia, Iran, and North Korea. While Russia is not subject to comprehensive sanctions, CAATSA demonstrated strong congressional intent to punish Russia for election interference and keep many economic measures in place that affect the Russian energy, financial, and defense industries for the foreseeable future.
June 16, 2017	President Trump signaled a strong disinclination to continue President Obama's rapprochement with Cuba, announcing upcoming changes to the Cuba sanctions program that will more closely restrict authorized individual travel to Cuba and permissible dealings with the Cuban government and military, intelligence, or security services.
June 8, 2017	The EU adopted Council Decision 2017/975 implementing UN Security Resolution 2356 (2017), imposing asset freezes and travel bans on 18 North Korean officials.
June 2, 2017	The UN Security Council adopted Resolution 2356 (2017), imposing new sanctions on 18 North Korean officials in response to North Korea's ballistic missile tests.
June 1, 2017	OFAC announced additional North Korean designations, including designations of certain Russian oil and gas companies for their conduct regarding North Korea. The designations are notable because the Russian companies are not located in or owned by North Korea; rather, the companies are Russian and were identified as supplying North Korea with petroleum and circumventing sanctions.
May 29, 2017	The EU adopted Council Decision 2017/917, renewing sanctions on Syria, including asset freezes and travel bans, until June 1, 2018.
May 17, 2017	OFAC announced designations of several Chinese companies pursuant to "secondary sanctions" stemming from OFAC's Non-Proliferation Weapons of Mass Destruction sanctions program. Secondary sanctions target non-U.S. persons for conduct occurring outside of U.S. territory, making U.S. persons unable to do business with the target. Secondary sanctions are becoming a more common part of OFAC's actions against North Korea.
April 25, 2017	The EU adopted Council Decision 2017/734, renewing sanctions on Burma/Myanmar until April 30, 2018.
April 24, 2017	OFAC designated dozens of employees of the Syrian Scientific Studies and Research Center, an entity believed to be related to the country's capacity for production and use of chemical weapons. The designation is notable because regular employees, not just company leadership, are included in the designation.
April 20, 2017	OFAC published FAQs related to petitions for removal from the SDN list.
April 11, 2017	The EU adopted Council Decision 2017/689, renewing human rights-related sanctions on Iran until April 13, 2018.

Sanction News

April 7, 2017	The EU adopted Council Decision 2017/666, expanding existing sanctions on North Korea to include restrictions on conventional arms, metallurgy, and aerospace. The sanctions also prohibit providing services related to computers, mining, and chemical production, among other services to North Korea.
April 1, 2017	Part 8 of the Policing and Crime Act of 2017 was implemented, allowing UK's HM Treasury to assess civil penalties for financial sanctions violations. The maximum penalty was established at the greater of £1 million or 50 percent of the estimated value of the funds or economic resources. The Act also increases the maximum penalty from two to seven years, among other changes.
March 31, 2017	The EU adopted Council Decision 2017/621, extending restrictive measures with regard to Libya for an additional six months.
March 31, 2017	OFAC announced additional designations of North Korean individuals and entities, including Paeksol Trading Corporation and North Korean individuals located in Russia.
March 30, 2017	The EU adopted Council Decision 2017/607, extending restrictive measures with regard to Bosnia and Herzegovina until March 31, 2018.
March 14, 2017	U.S. Department of Commerce, Bureau of Industry and Security (BIS) announced a \$27 million fine of a Florida-based mail and package forwarding company for alleged violations of the EAR stemming from evasion and illegal attempts to export rifle scopes, night vision devices, and other weapons parts and EAR99 items.
March 13, 2017	The EU adopted Council Decision 2017/445, extending Ukraine-related asset freezes and travel bans until September 15, 2017.
March 7, 2017	OFAC announced a \$100 million settlement agreement with Zhongxing Telecommunications Equipment Corporation and its subsidiaries and affiliates (ZTE) for apparent violations of the Iranian Transactions and Sanctions Regulations, 31 C.F.R. Part 560 (ITSR). ZTE allegedly used third-party companies to covertly supply Iran with large quantities of U.S.-origin goods, including controlled goods appearing on the Commerce Control List (CCL). Separately, BIS announced a \$1.19 billion penalty against the company for illegally shipping telecommunications equipment to Iran and North Korea in violation of the Export Administration Regulations (EAR) and the ITSR. It is the largest civil penalty ever imposed by BIS.
March 3, 2017	The EU adopted Council Decision 2017/381, extending certain restrictive measures with respect to Ukraine until March 6, 2018.
February 27, 2017	The EU adopted Council Decision 2017/350, extending restrictive measures against Belarus until February 28, 2018.

February 27, 2017	The EU adopted Council Decision 2017/345, implementing UNSC Resolution 2321 (2016), providing for new measures against the Democratic People's Republic of Korea. These include export bans for copper, nickel, silver, zinc, statues, helicopters, and vessels; the tightening of prohibitions in the transport sector; and new restrictions in the banking sector.
February 17, 2017	The EU adopted Council Decision 2017/288, extending restrictive measures against Zimbabwe until February 20, 2018, and amending Council Decision 2011/101 to permit the export of certain equipment that might be used for internal repression where the equipment is solely for civilian use in mining or infrastructure projects, subject to authorization on a case-by-case basis.
February 9, 2017	The Department of the Treasury implemented the Federal Civil Penalties Inflation Adjustment Act with the issuance of new regulations. The adjustments increase penalty amounts and figures in the base penalty matrix by anywhere from 10-100% (or more) in various Treasury sanctions programs.
February 2, 2017	OFAC updated its list of medical devices requiring specific authorization under the Iranian Transactions and Sanctions Regulations.
February 2, 2017	OFAC released General License No. 1, authorizing certain transactions with Russia's Federal Security Service (FSB). Subject to particular limits, transactions authorized include "[r]equesting, receiving, utilizing, paying for, or dealing in licenses, permits, certifications" from the FSB for importing, distributing, or using information technology products in Russia.
January 13, 2017	OFAC published a final rule amending Sudanese sanctions by broadly authorizing (via a General License Authorizing Transactions Involving Sudan, 31 C.F.R. § 538.540) transactions with individuals and entities in Sudan and unblocking property involving the Government of Sudan. Sanctions against North Sudan remain technically in force until July 12, 2017, when Executive Orders 13067 and 13412 are scheduled to be revoked.
December 20, 2016	The U.S. updated its Specially Designated Nationals (SDN) List and the Sectoral Sanctions Identifications (SSI) List to target additional Russian/Ukrainian entities due to the ongoing conflict in Ukraine and published a Russia/Ukraine-related General License 11, related to project design reviews or permits from FAU Glavgosekspertiza Rossii's office(s) in the Russian Federation.
October 14, 2016	The U.S. announced additional Cuban Assets Control Regulations (CACR) revisions, easing Cuban sanctions related to scientific collaboration, humanitarian activities, trade, and commerce. The primary embargo on Cuba remains in place.

Sanction News

October 7, 2016	The U.S. terminated the national emergency in Burma by Executive Order, revoking prior Burma-related Executive Orders, and removed specially designated and blocked persons from its financial sanctions list for that country. Other persons in Myanmar remain restricted due to other sanctions programs (e.g., narcotics trafficking, etc.). Myanmar is still subject to enhanced export controls under the Export Administration Regulations (EAR) and anti-money-laundering special measures.
September 20, 2016	The EU adopted Council Decision 2016/1693, imposing restrictive measures against members of Al Qaida and ISIL, including an arms embargo, asset freezes, and travel restrictions.
September 14, 2016	Executive Order 13739 terminated the national emergency in the Côte d'Ivoire, and the U.S. removed specially designated and blocked persons from its program list for that country.
September 1, 2016	The U.S. updated its SDN List and the SSI List to target additional Russian/Ukrainian entities, including a major Russian construction firm and financial organizations, pursuant to the continuing sanctions program under EO 13661.
August 4, 2016	The EU adopted Council Decision 2016/1341, expanding restrictions on North Korea, including placing restrictions on vessels flagged by North Korea and expanding the list of restricted items.
June 20, 2016	The EU adopted Council Decision 2016/994, terminating the arms embargo on Liberia.
June 9, 2016	The EU adopted Council Decision 2016/917, terminating restrictive measures on Côte d'Ivoire.
May 27, 2016	EU adopted Council Decision 2016/849, broadly expanding North Korean sanctions to include prohibitions on the export of dual-use goods and technology, imports of petroleum products and luxury goods from North Korea, funds transfers to and from North Korea, and investments between North Korea and Europe, among other restrictions.
May 25, 2016	UNSC adopted Resolution 2288 (2016), terminating sanctions on Liberia, including arms restrictions.
April 29, 2016	The U.S. extended a Belarus-related general license for transactions with certain specially designated Belarussian state entities.
April 29, 2016	The EU adopted Council Decision 2016/627, extending the arms embargo and human rights-related sanctions on Myanmar until April 30, 2017.
April 28, 2016	UNSC adopted Resolution 2283 (2016), terminating all arms, travel, and financial sanctions against Côte d'Ivoire.

March 31, 2016	The EU adopted Council Decision 2016/476, implementing UN restrictive measures against North Korea, including sectoral restrictions on importations of gold, titanium ore, iron, and other metals/minerals; restrictions on the sale or supply of aviation fuel; restrictions on correspondent banking relationships with entities linked to North Korea; and requiring inspection of North Korean vessels and vessels going to or from North Korea, among other restrictions.
March 16, 2016	The U.S. issued Executive Order 13722, announcing the blocking of the Government of North Korea and Workers' Party property and the prohibition of certain other transactions. In conjunction, the U.S. Treasury announced that the transportation, mining, energy, and financial services industries in the North Korean economy would be targeted.
March 15, 2016	The U.S. published updated CACR to further relax economic sanctions in effect for Cuba. Certain sanctions related to travel, trade, financial services, commerce, humanitarian issues, and banking were relaxed.
January 16, 2016	The P5+1, the European Union, and Iran reached Implementation Day, resulting in the lifting of certain sanctions against Iran. The U.S. lifted nuclear-related sanctions on Iran, and provided guidance on various licenses and exceptions. But broad U.S. sanctions remain in effect for U.S. and U.S.-controlled entities. Meanwhile the EU lifted almost all remaining sanctions on Iran. However, EU restrictions remain on exports of certain goods and technology, including goods/technology listed on the Nuclear Suppliers Group list, software designed for use in nuclear and military industries, and graphite and certain raw or semi-finished materials.

U.S. Checklist: Trade and Other Restrictions Affecting Foreign Countries

<p>Please note: This list is intended to alert users to possible issues involving transactions with the named countries. It is not intended to constitute, or substitute for, legal advice.</p>	Comprehensive Sanctions ¹	Trade Restrictions ²	Financial Sanctions ³	Specially Designated Nationals (Individuals and Organizations) ⁴	Anti-Boycott Concerns ⁵	Restricted Trade in Defense Articles/ Weapons ⁶
Country						
Afghanistan						X
Balkans (Western) (relating to former Yugoslavia)				X		
Belarus				X		X
Burma (Myanmar) ^a						X
Burundi				X		
Central African Republic				X		X
Crimea ^b	X	X	X	X		X
Cuba ^c	X	X	X	X		
Cyprus						X
Democratic Republic of the Congo				X		X
Eritrea						X
Haiti						X
Iran ^d	X	X	X	X		X
Iraq				X	X	X
Kuwait					X	
Lebanon				X	X	X
Libya				X	X	X
Nicaragua				X		
North Korea		X	X	X		X
People's Republic of China (PRC)						X
Qatar					X	
Russia ^b		X	X	X		X
Saudi Arabia					X	
Somalia				X		X
Sudan ^e				X		X
Syria	X	X	X	X	X	X
Ukraine ^b				X		
United Arab Emirates					X	
Venezuela			X	X		X
Yemen				X	X	
Zimbabwe				X		X

U.S. Checklist footnotes and category summaries on pages 16-18.

EU Checklist: Trade and Other Restrictions Affecting Foreign Countries

<p>Please note: This list is intended to alert users to possible issues involving transactions with the named countries. It is not intended to constitute, or substitute for, legal advice.</p> <p>Country</p>	Broad Sanctions ¹	Trade/Investment Restrictions ²	Asset Freeze/Travel Restrictions ³	Arms & Related Materiel Embargo ⁴
Afghanistan		X	X	X
Belarus		X	X	X
Bosnia and Herzegovina			X	
Burma (Myanmar) ^a		X		X
Burundi			X	
Central African Republic		X	X	X
Crimea ^c		X	X	
Democratic Republic of the Congo		X	X	X
Egypt			X	
Eritrea		X	X	X
Guinea (Republic of Guinea-Conakry)		X	X	X
Guinea-Bissau			X	
Iran				X
Iraq		X	X	X
Lebanon		X	X	X
Libya		X	X	X
Mali ^g			X	
Moldova			X	
North Korea	X	X	X	X
People's Republic of China (PRC)				X
Russia ^c		X	X	
Somalia		X	X	X
South Sudan		X		X
Sudan		X	X	X
Syria	X	X	X	X
Terrorist Groups (Foreign Terrorist Organizations) ^d		X	X	X
Tunisia			X	
Ukraine ^c			X	
Venezuela ^f			X	X
Yugoslavia (former) ^e			X	
Zimbabwe ^b			X	X

EU Checklist footnotes and category summaries on pages 19-20.

U.S. Checklist – Further Information

U.S. Checklist Notes:

^{a/} The U.S. eased sanctions on Burma by issuing general licenses authorizing the exportation of U.S. financial services to Burma, new investment in Burma and importing into the U.S. products of Burma, subject to certain restrictions. New investment with the Burmese Ministry of Defense and other armed groups, activities with certain sanctioned parties and importation of jadeite or rubies mined or extracted from Burma is still prohibited.

^{b/} Since the issuance of Executive Order 13660 (March 6, 2014), Executive Order 13661 (March 17, 2014), and Executive Order 13662 (March 24, 2014), the U.S. has gradually extended sanctions against Russia because of its occupation of portions of Ukraine. The expanded sanctions include the designations of SDNs in both Russia and Ukraine, targeted trade restrictions against the Russian defense, banking, and energy industries, the targeting of certain Russian economic sectors for financial sanctions, and restrictions on new debt and equity. Executive Order 13685 (December 19, 2014) implements broad-based sanctions against the Crimea region of Ukraine. While we recognize that Crimea is not a country, it is included on this chart because of the nature of the sanctions that have been imposed. Congress's passage of the Countering America's Adversaries Through Sanctions Act (CAATSA) on August 2, 2017 (PL No. 115-44), codified some earlier sanctions on sectors of the Russian economy and defense industries, and imposed additional economic measures on Russia, Iran, and North Korea. Although Russia is not subject to comprehensive sanctions, CAATSA demonstrated strong congressional intent to punish Russia for election interference and keep many economic measures in place that affect the Russian economy.

^{c/} Cuba has been removed from the list of State Sponsors of Terrorism. On January 15, 2014, the U.S. amended the Cuban sanctions in order to allow certain travel under general licenses, encourage people-to-people contact via telecommunications, and to allow a very limited set of transactions between U.S. persons and Cuba. Additional relaxation by OFAC license and regulatory changes further permitted individual and business interaction with Cuban nationals. Further changes in 2015 and 2016 markedly eased OFAC's financial sanctions program for Cuba by permitting an expanded set of activities related to scientific collaboration, communication, travel, commerce with the Cuban people, transportation, financial transactions, and activities in

other areas. However, the broad U.S. embargo against Cuba remains intact, and President Trump signaled a strong disinclination to continue rapprochement with Cuba, announcing revisions to the Cuba sanctions program that more closely restrict authorized individual travel to Cuba and permissible dealings with the Cuban government and military, intelligence, or security services as of November 2017. OFAC, BIS, and/or Department of State licenses for transactions in Cuba are still frequently required.

^{d/} On May 8, 2018, President Trump announced his decision to withdraw from the JCPOA and to reimpose U.S. nuclear-related sanctions lifted in 2016 to implement the accord. Following two consecutive 90-day wind-down periods (ending August 6, and November 4, 2018, respectively), the full reimposition of U.S. pre-JCPOA sanctions on Iran occurred. Sanctions apply to certain transactions by foreign subsidiaries owned or controlled by a U.S. person. Public companies must disclose certain Iran-related activities in their annual and quarterly reports filed after February 6, 2013. The U.S. may sanction any person determined by OFAC to have assisted or supported certain entities of or activities by the Government of Iran, regardless of any involvement by U.S. persons ("secondary sanctions"). Congress's passage of the Countering America's Adversaries Through Sanctions Act (CAATSA) on August 2, 2017 (PL No. 115-44), imposed additional economic measures on Russia, Iran, and North Korea.

^{e/} Effective July 9, 2011, the U.S. formally recognized the Republic of South Sudan as a sovereign state. Sanctions against Sudan were revoked pursuant to Executive Order (EO) 13761, as amended by EO 13804. These actions authorized transactions with individuals and entities in Sudan and solidified the unblocked property involving the Government of Sudan. OFAC published new Frequently Asked Questions regarding this revocation, as well as a new General License authorizing certain transactions pursuant to the Trade Sanctions Reform and Export Enhancement Act of 2000. This action does not affect OFAC sanctions related to the conflict in Darfur, which were imposed pursuant to EO 13400 pursuant to the national emergency declared in EO 13067. The controls that applied to Sudan until October 12, 2017, did not apply to the Republic of South Sudan. 76 Fed. Reg. 41046 (July 13, 2011). On June 28, 2018, OFAC announced the removal of the Sudanese Sanctions Regulations.



Summary of Categories:

¹Comprehensive Sanctions: These countries are subject to far-reaching economic sanctions implemented by the Department of the Treasury's Office of Foreign Assets Control ("OFAC"). The restrictions potentially affect nearly all dealings by U.S. persons in property of the listed countries, including limitations on imports, exports and financial transactions. Further information can be found at <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>.

²Trade Restrictions: These countries are subject to relatively broad trade restrictions affecting exports, imports or both. These restrictions are not limited to strategic, dual-use or defense items but generally extend to nearly all goods.

³Financial Sanctions: U.S. persons may not conduct financial transactions with these countries and their entities or within sectors of their economy. All of these restrictions are implemented by OFAC.

⁴Specially Designated Nationals (Individuals and Organizations): U.S. persons are restricted in their ability to engage in transactions with specially designated nationals, or SDNs (a group

that includes specified individuals and entities and vessels), wherever they may be located. The countries listed are those countries in which SDNs are specifically referenced. In addition to persons linked to these countries, the SDN list also includes individuals, entities and vessels, wherever located, that are regarded as terrorists, narcotics traffickers or proliferators of weapons of mass destruction or as contributing to these activities. An up-to-date list of SDNs is maintained by the Department of the Treasury's Office of Foreign Assets Control. See <http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>.

⁵Anti-Boycott Concerns: U.S. persons are subject to civil and criminal penalties, or in some cases to the denial of tax advantages, if they participate in foreign boycotts that the U.S. does not support. The foreign economic boycott that is of principal concern to U.S. companies is the Arab League boycott of Israel. The Department of the Treasury (Office of the International Tax Counsel/Tax Policy) publishes a quarterly list of "boycotting" countries, on which the named countries are found.

⁶Restricted Trade in Defense Articles/Weapons: The Department of State's Directorate of Defense Trade Controls ("DDTC") maintains a list of countries for which it has adopted specific policies—generally highly restrictive—relating to the export of defense articles and defense services. See www.pmdtdc.state.gov/embargoed_countries/index.html. These countries are also indicated as country group D:5 in The Export Administration Regulations ("EAR"), See 15 U.S.C. Part 740 Supp. 1; and are subject to restrictions with regard to the exportation of 600 series items.

Though there are no current embargoes on the Kyrgyz Republic and the Republic of Guinea, DDTC has issued a "Notice to Exporters" for each country stating that license applications for the export of U.S. Munitions List (USML) items to these countries may be delayed and approval should not be assumed.

Additionally, DDTC issued a "Notice to Exporters" regarding the issuance of export licenses for major defense equipment (defined in 22 U.S.C. 2794(6)) to be exported to Pakistan. Currently, the issuance of licenses is prohibited absent an appropriate certification or waiver under Section 203 of the Enhanced Partnership with Pakistan Act of 2009 (Public Law 111-73) in fiscal years 2012-14.

Non-Country Based Lists to Check:

The Department of Commerce's Bureau of Industry and Security ("BIS") maintains links to several other lists, compiled by various U.S. government agencies, that can be checked prior to engaging in exports or re-exports. (See <http://www.bis.doc.gov/complianceand enforcement/liststocheck.htm>) Among these are the following, all of which are compiled by the Department of Commerce and apply to specific individuals or entities:

- (1) The **Denied Persons List**, which includes individuals and entities that have been denied export privileges;
- (2) **The Unverified List**, which includes parties for which BIS has been unable to verify the end-user in prior transactions;
- (3) The **Entity List**, which includes parties whose presence in a transaction can trigger a license requirement under the Export Administration Regulations; and
- (4) The **Consolidated Screening List**, which combines export screening information from the Departments of Commerce, State, and Treasury.

Please note: This information is intended to alert users to possible issues involving transactions with the named countries. It is not intended to constitute, or substitute for, legal advice.



EU Checklist – Further Information

EU Checklist Notes:

^{a/} The EU has agreed to suspend, in large part, sanctions issued in the past. This does not include Arms and Related Materiel (April 23, 2012).

^{b/} On 2/18/13, 3/27/13 and 2/13/14 the EU suspended most sanctions that freeze Zimbabwe's funds and economic resources and impose travel restrictions on certain individuals, entities and bodies. Nevertheless, some assets remain frozen and some individuals remain subject to travel restriction. The EU extended its remaining sanctions on Zimbabwe until February 20, 2020, per Council Decision (CFSP) 2018/224.

^{c/} Council Regulation (EU) No 269/2014 of 17 March 2014; Council Regulation (EU) 692/2014 of 26 June 2014; Council Regulation (EU) 833/2014 of 31 July 2014 (as amended); Council Regulation (EU) 960/2014 of 8 September 2014; Council Regulation (EU) 1351/2014 of 18 December 2014.

^{d/} The sanctioned persons include Al-Qaeda and the Taliban.

^{e/} The EU lists the measures under current names of regions of the former Yugoslavia: Bosnia and Herzegovina, Serbia and Montenegro. The restrictions apply only to specific individuals indicted by the International Criminal Tribunal for the former Yugoslavia.

^{f/} The EU adopted an arms embargo and the framework to implement sanctions on targeted individuals in the Venezuelan Government on November 13, 2017. The first addition of officials to the Venezuela sanctions list occurred January 22, 2018. See Council Decision (CFSP) 2018/90, Council Implementing Regulation (EU) 2018/88.

^{g/} The EU acted (Council Decision (CFSP) 2017/1775) to implement UN Resolution 2374 permitting sanctions with respect to those threatening Mali's peace agreement.

Summary of Categories:

¹ **Broad Sanctions:** This category generally does not encompass the same kind of comprehensive sanctions programs typically imposed by the U.S., which affect nearly all economic sanctions with the named country. Inclusion of a country here does indicate, however, that the EU has imposed a variety of restrictions on trade (including, but extending

beyond, an arms embargo), dealings with certain named individuals or entities, and, sometimes, diplomatic sanctions.

² **Trade/Investment Restrictions:** This category may encompass restrictions on exports of certain types of services or technology, investment in particular sectors and imports of certain items. Generally the restrictions are more limited than those in the "Trade Restrictions" category in the U.S. checklist.

³ **Asset Freeze/Travel Restrictions:** The EU typically imposes a freeze of assets or restrictions on travel (admission) to the EU only with respect to specified individuals or entities. For example, in the case of Moldova, the sanctions in this category were applied only to persons responsible for the campaign against Latinscript schools in the Transnistrian region and are valid until September 30, 2014. See p. 58/111.

⁴ **Arms and Related Materiel Embargo:** The EU often imposes restrictions in this category in accordance with U.N. Security Council Resolutions, as is the case with respect to Sudan.

Resource for EU Restrictions: http://eeas.europa.eu/cfsp/sanctions/index_en.htm

Note regarding Germany:

Germany makes available extensive materials on its export control regime. (See web site reference below.) In addition to observing the EU-wide restrictions, it establishes special license requirements for export items that (1) are intended for conventional military end use and (2) are to be sent to a "Country List K" destination. The Country List K currently consists of Cuba and Syria.

Germany also requires specific authorization if (1) the export items are intended for use in a nuclear plant and (2) a purchasing country or destination is one of the following:

Algeria	Jordan
India	Libya
Iran	North Korea
Iraq	Pakistan
Israel	Syria

Resource for German Restrictions:

www.bafa.de/bafa/en/export_control/index.html



Note regarding Canada:

Canada typically imposes sanctions mandated by UN Security Council resolutions. In addition, although it is not an EU member, Canada often follows the EU in adopting non-UN based sanctions, such as those imposed on Belarus or Zimbabwe. It has not, however, followed the EU in adopting sanctions against Moldova.

Resource for Canadian restrictions:

www.international.gc.ca/sanctions/index.aspx

Russia/Ukraine: Canada has adopted sanctions against Russia that closely mirror those adopted by the U.S. and the EU.

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UN Checklist – Security Council Mandated Sanctions

The UN Security Council can impose mandatory non-military sanctions under Chapter VII of the UN Charter in furtherance of its mission to maintain or restore international peace and security. While the substance of the relevant Security Council resolutions varies, all of the following countries and groups, except Lebanon, are currently subject to at least some restrictions on the supply of arms and related material; additional restrictions, including travel restrictions and asset freezes applicable to named individuals, may also apply.

Central African Republic
Congo (Democratic Republic of the Congo)
Guinea-Bissau
Iraq
Lebanon*
Libya
Mali
North Korea
Somalia
South Sudan
Sudan
Yemen
Terrorists (includes ISIL, Al-Qaeda and the Taliban)

*/Restrictions on individuals involved in the killing of former Prime Minister Rafiq Hariri.

Resource for UN sanctions: www.un.org/sc/committees

Asian Countries: Our research has found little information on country-based export control regimes currently available online, at least in English, from official Chinese or Japanese sources. By contrast, Hong Kong, a special administrative region of China, maintains an easily accessed list of restrictions it enforces against countries that are subject to UN sanctions. Hong Kong's list mirrors the UN checklist set forth above.

Resource for Hong Kong restrictions: www.tid.gov.hk/english/import_export/uns/uns_countrylist.html

Singapore also publishes helpful information online. It sets forth the specific restrictions on various countries and persons it implements in accordance with UN sanctions. Singapore also supplies links to information on U.S., EU and Japanese restrictions under the title, "Unilateral Sanctioned Lists or Embargoes."

Resource for Singapore restrictions and links: www.customs.gov.sg/stgc/leftNav/san

South Africa: Although most of South Africa's official online governmental materials appear to be published in English, we have not found any specific discussion of economic sanctions. As a long-standing UN member, however, South Africa presumably implements mandatory economic sanctions adopted by the UN Security Council. It should be noted that Zimbabwe—which is not currently subject to UN sanctions—raises special issues for South Africa, a neighboring country that has received numerous refugees from Zimbabwe. South Africa's current President, Jacob Zuma, has called for the lifting of sanctions imposed against Zimbabwe. The U.S., EU and Canada are among those imposing the sanctions.

A considerable amount of trade-related information (although not currently covering economic sanctions or similar trade restrictions) can be found at the web site of the International Trade Administration Commission of South Africa: www.itac.org.za.

Australia: www.dfat.gov.au/un/unsc_sanctions/index.html

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