

# CHECKLISTS OF FOREIGN COUNTRIES SUBJECT TO SANCTIONS

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## COUNTRIES SUBJECT TO VARIOUS RESTRICTIONS BY THE U.S., EU, UK, AND UN

The following are checklists of countries that are subject to a variety of U.S., UK, 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 some overlap between the U.S. and EU and more overlap between EU and UK restrictions, 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.*

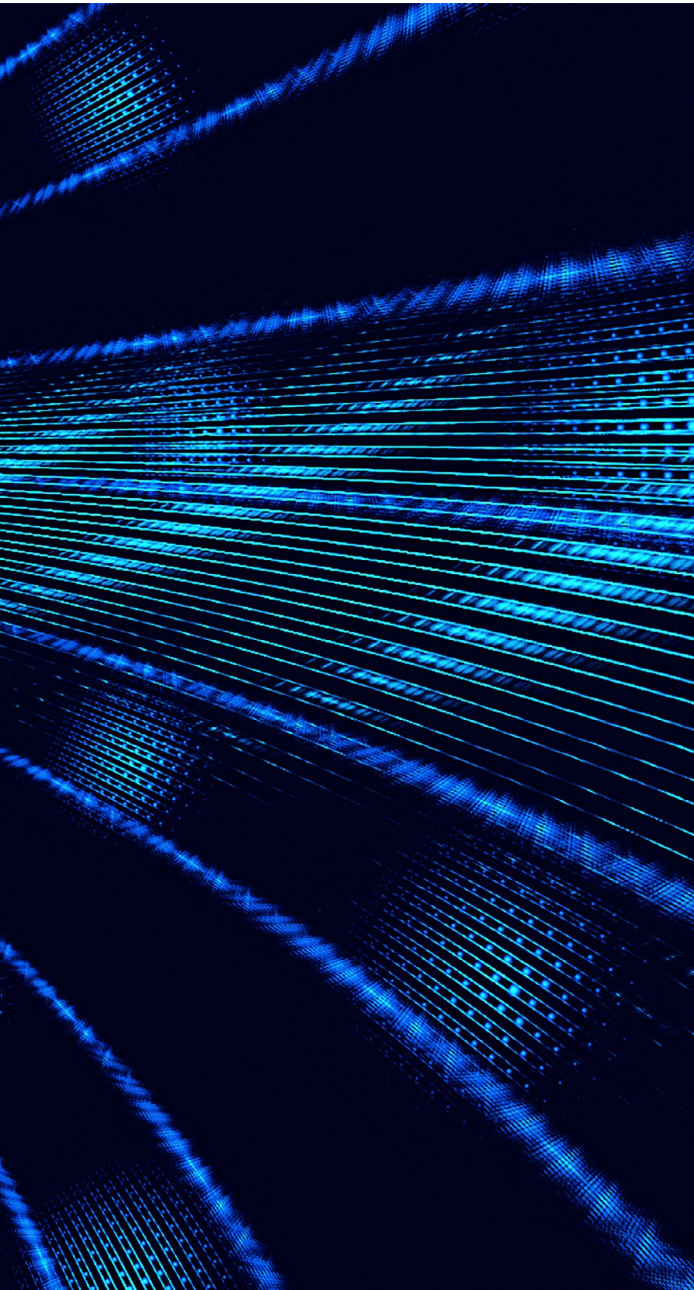
## U.S. CHECKLIST: TRADE AND OTHER RESTRICTIONS AFFECTING FOREIGN COUNTRIES

**Please note:** This list is intended to alert users to possible issues involving transactions with the named countries (or regions i.e., Crimea). It is not intended to constitute, or substitute for, legal advice.

Country / Region	Afghanistan	Balkans (Western) (relating to former Yugoslavia)	Belarus	Burma (Myanmar) <sup>a</sup>	Cambodia	Central African Republic	China (PRC) <sup>c</sup>	Cuba	Cyprus	Democratic Republic of the Congo	Eritrea	Ethiopia	Haiti	Iran	Iraq	Kuwait	Lebanon	Libya	Mali	Nicaragua	North Korea	Qatar	Russia <sup>b</sup>	Saudi Arabia	Somalia	South Sudan	Sudan <sup>e</sup>	Syria	Ukraine <sup>b</sup>	Sanctioned Regions of Ukraine – Luhansk, Donetsk, Crimea <sup>b</sup>	United Arab Emirates	Venezuela <sup>f</sup>	Yemen	Zimbabwe		
Comprehensive Economic and Trade Sanctions <sup>1</sup>							x							x						x							x		x							
Limited Country Sanctions <sup>2</sup>	x		x	x			x															x										x				
Sectoral Sanctions <sup>3</sup>			x	x			x															x										x				
Debt & Equity Sanctions or Targeted Investment Restrictions <sup>4</sup>			x			x	x	x															x										x			
Specially Designated Nationals (Individuals and Organizations) <sup>5</sup>	x	x	x	x		x	x	x		x		x		x	x		x	x	x	x	x		x		x	x	x	x	x	x		x	x			
Restricted Trade in Defense Articles/Weapons (ITAR) <sup>6</sup>	x		x	x	x	x	x	x	x	x	x	x	x	x	x		x	x			x	x		x	x	x	x		x		x		x		x	
Military End Users/Use Restrictions (EAR) <sup>7</sup>			x	x	x		x	x						x							x		x							x			x			
Anti-Boycott Concerns <sup>8</sup>															x	x	x	x				x		x			x						x			

U.S. Checklist endnotes and category summaries on pages 4-9.

# U.S. CHECKLIST – FURTHER INFORMATION



## Summary of U.S. Restriction Categories:

<sup>1/</sup> **Comprehensive Economic and Trade Sanctions:** These countries (or regions) are subject to far-reaching economic sanctions implemented by the Department of the Treasury's Office of Foreign Assets Control ("OFAC"). The restrictions potentially prohibit nearly all dealings by U.S. persons in property of the listed countries, including limitations on imports, exports and financial transactions.

These countries are also subject to broad trade restrictions on the provision of U.S. goods or services, including by non-U.S. persons. These restrictions are not limited to strategic, dual-use or defense items but generally extend to nearly all goods and services. Further information can be found at <http://www.treasury.gov/resource-center/sanctions>

<sup>2/</sup> **Limited Country Sanctions:** These are countries that, while not comprehensively sanctioned, are subject to sanctions targeting the regime in power or certain elements thereof and which involve restrictions in addition to SDN list entries. Although Zimbabwe and Nicaragua are not included because sanctions are limited to SDN designations, these countries pose an elevated sanctions risk because significant government actors or those who support them are sanctions targets and their property interests may include commercially significant government and civil entities or projects.

<sup>3/</sup> **Sectoral Sanctions:** This refers to sanctions that are not comprehensive but target certain economic sectors of countries subject to regime-focused sanctions. These may include restrictions against dealing in certain debt or equity of sanctions targets, target specific activity in an economic sector (such as oil production), or threaten sanctions on persons for operating in particular economic sectors in a country.

<sup>4/</sup> **Debt & Equity Restrictions:** Beginning with Russia in 2014, the U.S. began imposing sanctions on debt or equity issued by sanctions targets. Although these have been aimed at government-owned entities in certain sectors, and a type of sectoral sanction, they have also targeted some or all sovereign debt, and investments in certain companies (Chinese Military)

<sup>5/</sup> **Specially 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 individual, 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>.

<sup>6/</sup> **Restricted 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. 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. [Country Policies - DDTC Public Portal \(state.gov\)](#)

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.

#### <sup>7/</sup> **Military End Use/End User Rules under the EAR**

For companies exporting goods to Cambodia, Burma, Russia, or Venezuela, an important change took place with respect to products with military end uses or users on June 29, 2020. Military end use included direct uses, such as parts or components of weapons, as well as indirect uses, like those for maintenance or repair. After the June 29 changes, the definition of military end use was expanded to include "any item that supports or contributes to the operation, installation, maintenance, repair, overhaul, refurbishing, 'development' or 'production' of military items." The new definition could now capture any item tangentially related to military uses. See [Military End User List](#).

<sup>8/</sup> **Anti-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. See <https://www.bis.doc.gov/index.php/enforcement/oac>



### **U.S. Checklist Notes:**

<sup>a/</sup> **Burma (Myanmar).** The U.S. has imposed new sanctions on Burma by issuing EO 14014 (February 10, 2021), following a military coup and violence against protesters in the country. The EO blocks all property in the possession of U.S. persons that belongs to certain listed persons operating in the Burmese defense sector, responsible for the coup or unrest in Burma, who are members of the Burmese government or security forces, or other persons materially assisting the foregoing. These individuals must be explicitly designated (i.e., listed by OFAC) in order to become blocked. The Department of Commerce has also tightened export controls pertaining to Burma, moving it to Country Group D:1 as of March 8, 2021. 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 also remains prohibited. An interim final rule published on April 8, 2021 added Burma to the list of countries with military-intelligence-related controls. An exporter, reexporter, or transferor requires a license if there is knowledge the item is destined for a military-intelligence end use or user in Burma.

<sup>b/</sup> **Russia/Crimea.** Following the issuance of Executive Orders 13660 (March 6, 2014), 13661 (March 17, 2014), and 13662 (March 24, 2014), the U.S. has gradually strengthened sanctions against Russia because of its annexation of Crimea and subsequent invasion of Ukraine in February 2022, resulting in a series of new Executive Orders (14065, 14066, 14068, 14071) and Directives that imposed major new sanctions on Russia for its malign activities. The expanded sanctions include the designations of SDNs in both Russia and Ukraine, targeted export restrictions against the Russian defense, and energy industries, broad commodity restrictions on many EAR99 goods, the targeting of government-controlled entities in its defense, banking, and energy sectors with prohibitions on new debt and equity. Separate sanction prohibit the provision of goods, technology, and non-financial services for deepwater, Arctic offshore, or shale projects in any location where a listed entity has a 33% or greater ownership interest. Executive Order 13685 (December 19, 2014) implements broad-based sanctions against the Crimea region of Ukraine, and EO 14065 imposed similar restrictions on the more limited territories of the Dontetsk and Luhansk People's Republics. While we recognize that these territories are not a "country," their inclusion 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. On March 2, 2021, the Department of State added Russia to the "Section 126.1" list, changing the license policy for most ITAR articles and services to a "presumption of denial". Exports, reexports, or transfers of goods subject to the EAR involving Russian military end uses or end users, or involving goods included in the relevant supplements to EAR Part 746, are also subject to additional restrictions. Although Russia is not subject to comprehensive sanctions, heavy list-based, geographic, and export/import sanctions are being imposed on Russia. Future revisions will provide additional detail.

<sup>d/</sup> **Iran.** On May 8, 2018, the U.S. withdrew the U. from the The Joint Comprehensive Plan of Action ("JCPOA") and to reimpose U.S. nuclear-related sanctions lifted in 2016 to implement the accord. 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. 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. The Biden Administration has been unable to reengage all parties in the JCPOA framework, but no major changes to U.S. sanctions reimposed by the Trump Administration have taken place as of the date of this publication.

<sup>e/</sup> **Sudan.** 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. On June 28, 2018, OFAC announced the removal of the Sudanese Sanctions Regulations. Sudan was removed from the list of State Sponsors of Terrorism on December 14, 2020. 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.

<sup>f/</sup> **Venezuela.** On August 5, 2019, the U.S. issued Executive Order 13884 blocking property of the Government of Venezuela for U.S. persons. The new prohibition is a steep escalation of consequences on the Maduro regime's government, preventing U.S. companies and individuals from doing business with any government of Venezuela entity, official, or any entity owned by or controlled the government. Executive Order 13850 (November 1, 2018) imposed prohibitions on U.S. persons' abilities to engage in certain sectors of the Venezuelan economy, such as the gold, oil, and banking sectors. Exports, reexports, or transfers of goods subject to the EAR involving Venezuelan military end uses or end users are also subject to additional restrictions.

<sup>g/</sup> **Israel-Palestine.** Since October 7, 2023, the U.S. has implemented more sanctions in response to the aggression taking place during the Israel-Hamas war. Sanctions have been issued against Hamas, Yemeni Houthi Leaders, and Israeli settlers due to the continued violence. Sanctions will remain updated on OFAC's website.



## **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 <https://www.bis.doc.gov/index.php/policy-guidance/deemed-exports/deemed-exports-faqs/fag/148-what-is-the-relationship-of-the-entity-list-to-other-lists-maintained-by-the-u-s-government>

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.

For exports of EAR99 goods involving Russia and Belarus, or any of the comprehensively sanctioned countries, special controls exist in EAR Part 746 that capture many previously unregulated items.

**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.

## **Trade with China**

**Growing Tension between the U.S. and China has become a top national security priority.**

Tensions between the U.S. and China have grown over recent years, with China becoming a top national security priority. The U.S. has tightened export control restrictions involving China and Chinese entities and imposed blocking sanctions on certain Chinese entities and persons, heightened restrictions on financial investment in the country, and taken a number of steps to respond to human rights abuses occurring in certain portions of China, particularly the Xinjiang Autonomous Region. The Uyghur Forced Labor Prevention Act went into effect in June 2022, prohibiting the import of goods made *wholly* or in part from the Xinjiang Region. Documented due diligence and supply chain tracing are essential to combat forced labor in supply chains. Also in 2022, the CHIPS and Science Act imposes export controls on items that will be used in the "development" or "production" of integrated circuits at semiconductor manufacturing facilities located in China. This Act requires a three-part analysis, and exporters must consider: (1) the classification of the exported item, (2) the knowledge the exporter has about the end-use facility and its production capabilities, and (3) the role of the exported items and whether



they support the development or production of integrated circuits. An additional CHIPS-related rule, effective November of 2023, placed “national security guardrails” designed to limit the extent to which companies receiving CHIPS Act incentives could expand semiconductor investments in “countries of concern,” like China and Russia. Prior to that point, in August of 2023, President Biden issued an executive order establishing a new Outbound Investment Program to complement existing U.S. export controls and prohibit certain U.S. outbound investments to China in technology sectors related to military, intelligence, surveillance, and cyber-enabled capabilities. These actions, taken together, have

significant ramifications for U.S. companies doing business in China.

In addition, the U.S. has broad restrictions on exports to the Chinese military, and implements investment restrictions on designated Communist Chinese Military Companies. These rules were expanded to include military end users not limited to China, in addition to military end uses. The definition of “military end user” encompasses not only the military and government organizations supporting the military, but also “any person or entity whose actions or functions are intended to support ‘military end uses.’” [15 C.F.R. § 744.21\(g\)](#). On top of these revisions, BIS changed

the license review policy to a “presumption of denial” for most transactions involving military end use/end users in affected countries, making it more difficult to obtain a license if needed. [15 C.F.R. § 744.21\(e\)](#). These actions, taken together, have significant ramifications for U.S. companies doing business in China, with more changes to come. In December of 2023, the U.S. House select committee on China released its first set of economic policy recommendations, which ranged from dramatic shifts in U.S. policy to technical revisions of regulations, like reducing the \$800 de minimis threshold for duty-free imports from China.



## EU & UK CHECKLIST: TRADE AND OTHER RESTRICTIONS AFFECTING FOREIGN COUNTRIES

**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.

	Country	Afghanistan	Belarus	Bosnia and Herzegovina	Burma (Myanmar)	Burundi	Central African Republic	Crimea and occupied regions of Ukraine	Democratic Republic of the Congo	Guatemala	Guinea (Republic of Guinea-Conakry)	Guinea-Bissau	Haiti	Iran	Iraq	Lebanon	Libya	Mali	Moldova	Nicaragua	North Korea	People's Republic of China (PRC)	Russia	Somalia	South Sudan	Sudan	Syria	Tunisia	Turkey	Ukraine	Venezuela	Yemen	Zimbabwe	
Broad Sanctions <sup>1</sup>			x					x													x		x											
Trade/Investment Restrictions <sup>2</sup>		x	x		x		x	x	x						x	x	x	x				x		x	x					x	x		x	
Commodity Export/Import Restrictions <sup>2</sup>			x					x															x											
Asset Freeze/Travel Restrictions <sup>4</sup>		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x		x	x	x	x	x	x	x	x	x	x	x	x
Arms & Related Materiel Embargo <sup>5</sup>		x	x		x		x	x	x				x	x	x	x	x					x	x	x	x	x					x	x	x	

EU & UK Checklist endnotes and category summaries on pages 11-14.

# EU & UK CHECKLIST NOTES – FURTHER INFORMATION



## **Summary of Categories:**

<sup>1/</sup> **Broad Sanctions:** This category generally does not encompass the same kind of comprehensive sanctions programs typically imposed by the U.S., which prohibit nearly all activities involving the sanctioned country. Inclusion of a country here does indicate, however, that the EU or UK has imposed a variety of restrictions on trade (including, but extending beyond, an arms embargo), and certain financial services and or (re)insurance coverage, dealings with certain named individuals or entities, and, sometimes, diplomatic sanctions.

<sup>2/</sup> **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. These restrictions may be quite limited. Refer to the applicable EU or UK guidance.

[B]**Debt & Equity Restrictions:**[B] The EU imposed sanctions targeting debt and equity of Russian financial, energy and defense sectors in 2014 and the UK has continued those. The UK imposed sanctions on Dealing with transferable security/money-market instruments of any Belarusian authority or majority-owned credit or financial institution with maturity greater than 90 days or making a loan with more than a 90-day maturity to the same.

<sup>3/</sup>**Commodity Export/Import Restrictions on Non-Military Goods:** The EU and UK have placed restrictions on non-military, non-dual use commodity goods based on their HS (tariff) classifications rather than an export control alphanumeric designation. These controls limit exports of a broad range of machinery, electrical appliances, and other goods used in the commercial and industrial sectors. Importation of certain goods from Belarus and Russia are also prohibited, also defined by HS tariff code.

<sup>4/</sup> **Asset Freeze/Travel Restrictions:** The EU and UK typically imposes a freeze of assets or restrictions on travel (admission) to the EU or UK only with respect to specified individuals or entities (and entities they own or control) rather than broader country sanctions.

<sup>5/</sup> **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:** The EU provides a sanctions map at <https://www.sanctionsmap.eu/#/main>, and the consolidated list of persons, groups and entities subject to EU financial sanctions can be downloaded from Financial Sanctions Database (login required) at <https://webgate.ec.europa.eu/fsd/fsf>

**Resources for UK Restrictions:** <https://tinyurl.com/3h7k3cny>; <https://tinyurl.com/2phmd3rh>



**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 | Iran | Israel | Libya       | Pakistan |
| India   | Iraq | Jordan | North Korea | Syria    |

**Resource for German Restrictions:**

<https://cutt.ly/8r0lo2A>.

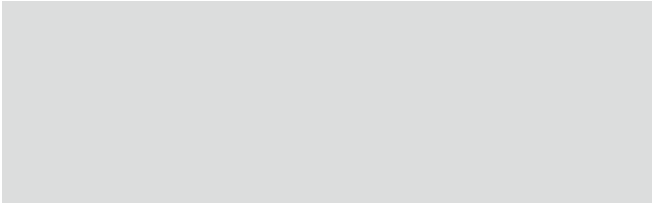
**Note regarding Canada:**

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

**Resource for Canadian restrictions:**

<https://cutt.ly/br0lhzO>.

**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.





## **UK and “Brexit” from EU Sanctions**

Following the end of the transition period for the UK’s exit from the EU, as of January 1, 2021, the UK implements its own sanctions programs, although they remain broadly harmonious with the EU’s scope. UK sanctions authorities have slowly been implemented, beginning with the regulations in force under the Sanctions and Anti-Money Laundering Act of 2018, but more recently the proliferation of Russia and Belarus sanctions programs have resulted in an expanded domestic sanctions apparatus. The UK has defined sanctions program groups for numerous thematic categories (e.g., chemical weapons, terrorism, cyber activity, financial misappropriation, human rights, etc.) and dozens of programs based on geographic territories. The UK also maintains arms embargo, export controls, and other trade restrictions programs. For example, it requires specific authorization for the export of certain commodity, dual-use, and military end-use items. The Export Control Joint Unit (ECJU) administers the UK’s export control and licensing system, while the Office of Financial Sanctions Implementation (OFSI) implements and enforces the UK’s financial sanctions.

**Note on UK – Russia/Belarus Sanctions.** UK’s independent sanctions on Russia went into effect on December 31, 2020, and were amended seventeen times in 2022 following Russia’s invasion of Ukraine. These sweeping restrictions include (1) financial sanctions and asset freezes on entities and individuals; (2) export controls on military and dual-use goods, critical-industry goods, and commodity goods defined by HS classification; (3) import prohibitions on revenue-generating goods originating in Russia; (4) certain services provided to Russia; (5) sectoral and transport sanctions, and (6) limited restrictions on certain occupied regions of Ukraine. As with the U.S. and EU sanctions programs, a detailed and fact-specific analysis of business ownership can be required to identify assets subject to freezes.

The UK placed additional sanctions on Belarus in July of 2022 following Belarusian assistance to Russia. Additional sanctions include restrictions on the import/export of military, dual-use and critical-industry goods and technology, financial restrictions, a prohibition on (re)insurance for Belarus government and state owned entities, and prohibitions on certain services.

**UK Guidance on Russia Sanctions:** <https://www.gov.uk/government/collections/uk-sanctions-on-russia>

**UK Guidance on Belarus Sanctions:** <https://www.gov.uk/government/publications/republic-of-belarus-sanctions-guidance/the-republic-of-belarus-sanctions-guidance>

**Note on EU – Russia/Belarus Sanctions.** The EU has also implemented significant sanctions in response to Russia’s actions in Ukraine, similar to those imposed by the UK discussed above. EU sanctions began in 2014 in response to the illegal annexation of Crimea and were strengthened after the events of 2022 involving Ukraine and the annexation of Ukraine’s Donetsk, Luhansk, Zaporizhzhia and Kherson regions. Restrictive measures include (1) individual and entity asset freezes and financial sanctions on specific economic sectors; (2) bans on media outlets; (3) export restrictions on military, dual-use, and luxury



goods, as well as industry-specific goods; (4) import restrictions on revenue-generating goods including crude oil and refined petroleum products, coal, steel, cement, and seafood; (5) services such as accounting and auditing; (6) transaction restrictions involving certain Russian state-owned entities; (7) sectoral and transport sanctions; and (7) limited restrictions on certain occupied regions of Ukraine. The list of banned products related to trade with Russia is “designed to maximise the negative impact of the sanctions for the Russian economy while limiting the consequences for EU businesses and citizens.” EU’s trade restrictions largely exclude products related to health, pharma, food and agriculture, to protect the citizens of Russia.

The EU has also adopted sanctions against Belarus in response to its involvement in the invasion of Ukraine. Restrictions on Belarus include individual and economic sanctions, restrictions on trade, a SWIFT ban for five Belarusian banks, a prohibition on (re)insurance for Belarus government and state owned entities, and limits on financial interactions between EU-based businesses and Belarus.

**EU Guidance on Russia Sanctions:** <https://www.consilium.europa.eu/en/policies/sanctions/restrictive-measures-against-russia-over-ukraine/sanctions-against-russia-explained/#sanctions>

**EU Guidance on Belarus Sanctions:** <https://www.consilium.europa.eu/en/policies/sanctions/restrictive-measures-against-belarus/>

# 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](http://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: <https://cutt.ly/Mr0lzEd>.

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:** <https://cutt.ly/Or0ljLk>.

**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](http://www.itac.org.za).

**Australia:** Australia implements the UN Security Council sanctions regimes, as well as "Australian autonomous sanctions regimes" under Australian sanctions laws. Australia has implemented many restrictions similar to the EU in response to Russia's invasion of Ukraine. <https://www.dfat.gov.au/search?keys=sanctions>

**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.







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Robert advises clients on compliance with the international trade regulations under the ITAR, the EAR, U.S. economic sanctions programs, customs law, anti-corruption laws, and the review of foreign investment in the United States. Robert regularly represents clients before OFAC, BIS, CBP, DDTC, CFIUS and other administrative, legislative, and judicial agencies. Robert is the Chair of the International Trade practice area.



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Tyler is an experienced international trade and regulatory attorney who provides comprehensive guidance to clients regarding the impact of federal law and regulations on domestic and international business. He provides comprehensive trade compliance advice on sanctions, import, export control, and related laws that affect a variety of sectors, including insurance and reinsurance, financial services, manufacturing, telecommunications, aviation, and unmanned aircraft systems. Tyler analyzes clients' ongoing multi-agency and multi-jurisdictional responsibilities, meeting emergent needs or conducting long term regulatory planning, such as compliance audits or drafting policies and procedures. He tracks business-critical legal developments throughout the rulemaking and implementation process, keeping clients informed and freeing compliance departments to focus on their day-to-day responsibilities.



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# ABOUT THE FIRM

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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 400 attorneys and 50 practice areas, we continue to serve clients throughout the United States and abroad.

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