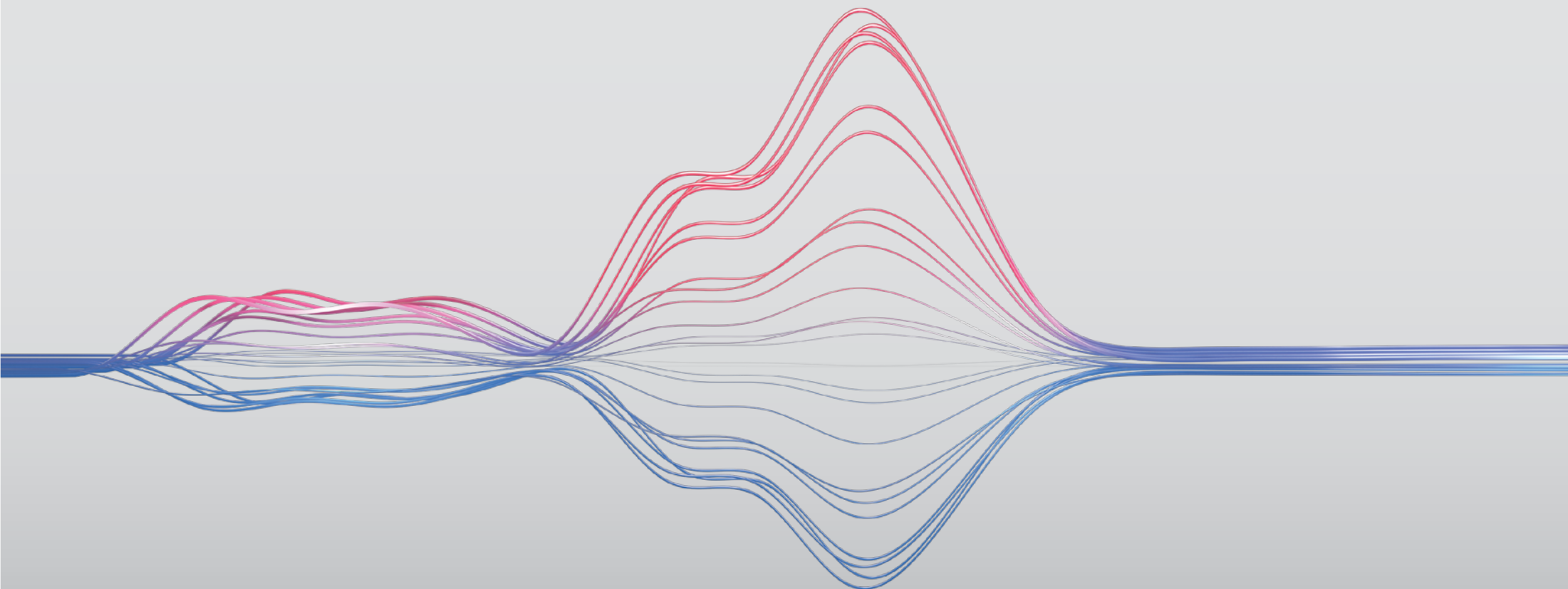
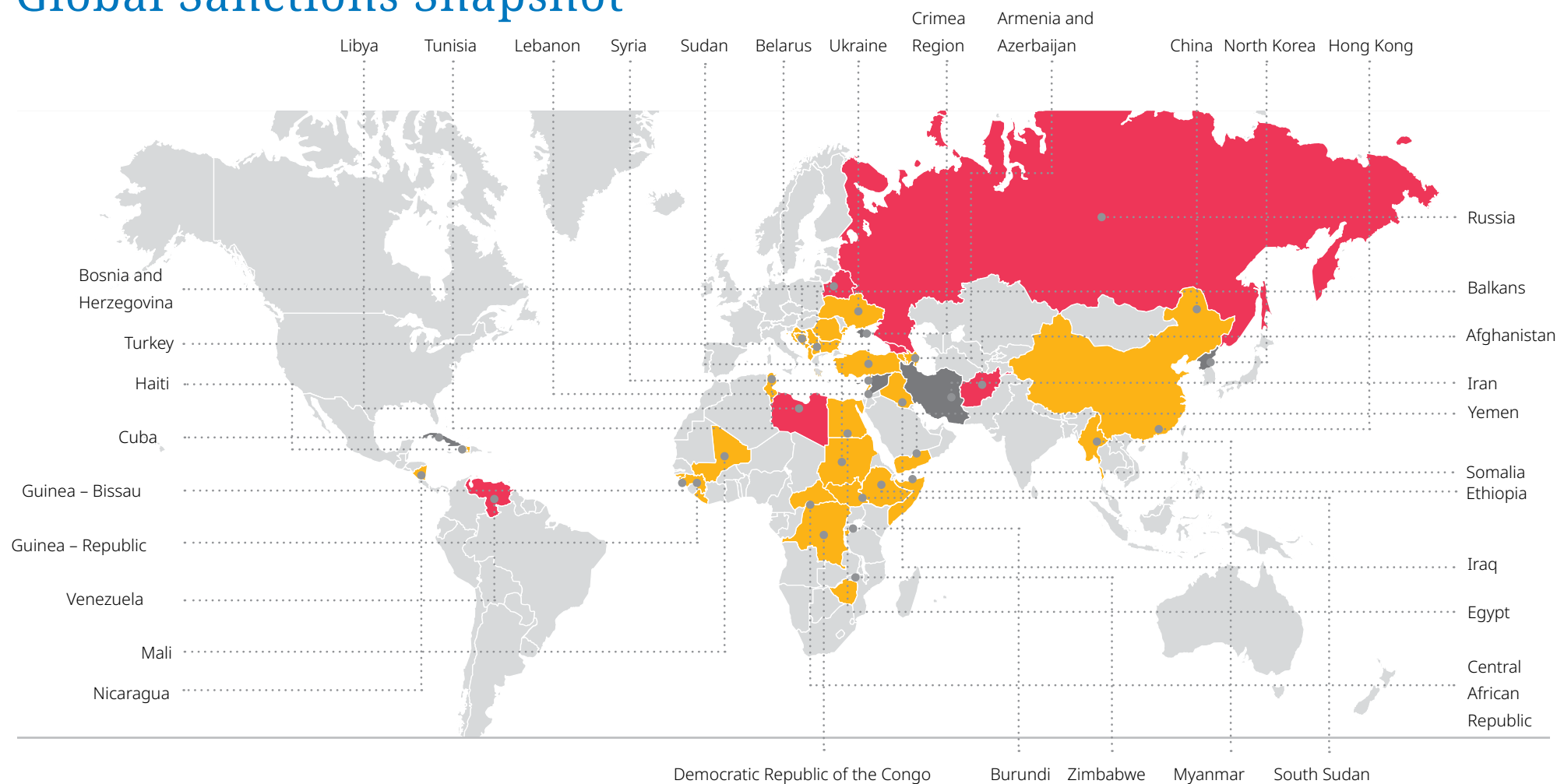


JANUARY 2022

EU/US/UK Sanctions Matrix



Global Sanctions Snapshot



- Sanctions regimes with wide ranging asset freezing provisions and extensive prohibitions on carrying out a range of cross border activity.
- Sanctions regimes which implement both targeted asset freezing provisions and targeted trade embargos covering specific sectors of the economy.
- Sanctions regimes which implement both targeted asset freezing provisions and/or limited trade restrictions.

Restrictive measures (economic sanctions, trade embargos) currently in force in the European Union, United States & United Kingdom

KEY

The traffic light ratings used below are subjective and will need to be tailored to the specific risk profile of your company's activities or the specific fact pattern of any potential transaction, including factors such as:

- Jurisdictions and nationalities;
- Immediate counter-parties and third parties;
- Product profile or specific services to be provided; and
- Payment transactions.

However, for reference, in general terms those sanctions regimes highlighted in:

BLACK – Include those sanctions regimes which implement both wide ranging asset freezing or blocking provisions and extensive prohibitions and wider restrictions on carrying out a range of cross border activities e.g. physical exports, provision of services, investment activity, financial transfers, etc. For these regimes, specific derogations or licencing exemptions may be available. However, DLA Piper would strongly advise seeking legal counsel before conducting any activity which may implicate these regimes. Note, some sanctions regimes may merit this classification under one or two sanctions regimes, but not the other(s).

RED – Include those sanctions regimes which implement both targeted asset freezing or blocking provisions and targeted trade embargos or restrictions covering specific sectors of the economy e.g. military/defence, oil and gas, telecommunications, petroleum and petrochemical etc. For these regimes, appropriate enhanced due diligence and counterparty checks will need to be undertaken before considering any activity. It is possible that specific derogations or licencing exemptions may be available. Note, some sanctions regimes may merit this classification under one or two sanctions regimes, but not the other(s).

AMBER – Include those sanctions regimes which implement targeted asset freezing or blocking provisions and/or very limited trade restrictions e.g. arms embargos or restrictions on specific equipment which may be used for internal repression. For these regimes, appropriate enhanced due diligence and counterparty checks are vital to ensure that: (a) There is no involvement of any individual or entity specifically designated under the regime; and, (b) the activity does not include or relate to wider prohibited or restricted goods. Note, some sanctions regimes may merit this classification under one or two sanctions regimes, but not the other(s).

IMPACT OF BREXIT:

As of the end of the Brexit transition period on 31 December 2020, sanctions implemented by the EU no longer apply to the UK (although a snapshot was retained as at that date).

This Sanctions Matrix reflects these changes and the new autonomous UK regime. Businesses must now review UK and EU sanctions measures separately and, where relevant, screen counterparties against both the UK Consolidated List and the EU Consolidated List of asset freezing targets.

Note: No legal advice is intended by this document. These informational materials are not intended, and should not be taken, as legal advice on any particular set of facts or circumstances.