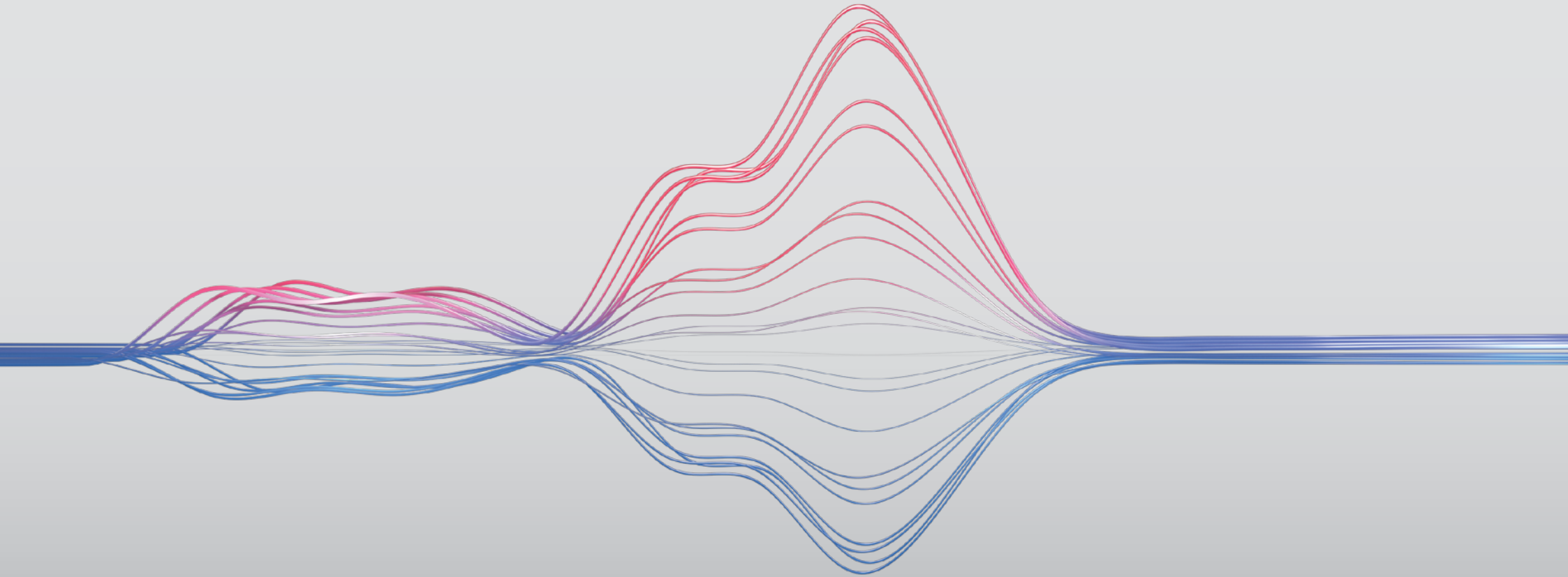
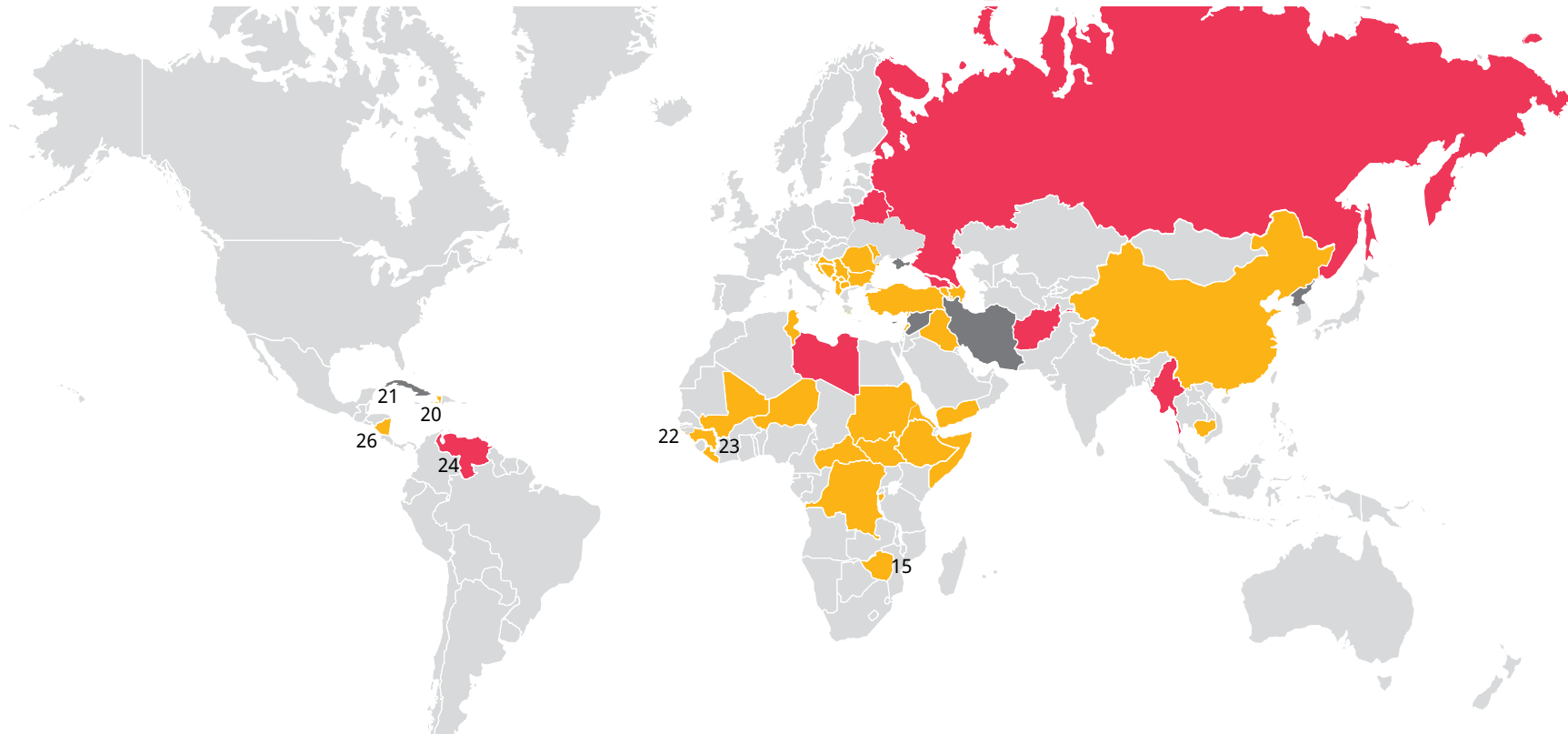


1 JANUARY 2024

EU/US/UK Sanctions Matrix



Global Sanctions Snapshot



KEY

The traffic light ratings used are of a general nature. Any assessment of sanctions risk should be tailored to your company's specific activities, taking into account factors such as:

- all jurisdictions and nationalities of persons and entities involved;
- identity of counter-parties and third parties;
- business activity, sector, product profile or specific services to be provided; and
- transaction structure, including payment flow.

THEMATIC SANCTIONS REGIMES:

Not all sanctions regimes are implemented on the basis of geography. So-called "Magnitsky sanctions", for example, can be imposed on persons who commit serious human rights violations, regardless of nationality. This Sanctions Matrix below covers these regimes but the nationalities of persons sanctioned under these regimes is not reflected in the Snapshot map.

BLACK – Countries which are subject to comprehensive US sanctions. In these jurisdictions, the US implements both wide ranging asset freezing or blocking provisions and extensive prohibitions and wider restrictions on carrying out a range of cross border activities eg physical exports, provision of services, investment activity, financial transfers, etc. The UK and EU do not have an exact equivalent to 'comprehensive' sanctions and their approach to the comprehensively sanctioned US countries varies from country to country.

RED – Countries targeted by both asset freezing or blocking sanctions and trade embargos or restrictions covering specific sectors of the economy eg military/ defence, oil and gas, telecommunications, petroleum and petrochemical etc. The extent of sanctions implemented varies from country to country and may differ across the US, UK and EU.

AMBER – Countries targeted by sanctions regimes which implement targeted asset freezing or blocking provisions and/or limited trade restrictions eg arms embargos or restrictions on specific equipment which may be used for internal repression. The extent of sanctions implemented varies from country to country and may differ across the US, UK and EU.

Note: This document represents a summary of the law as at the date of publication. The framework of sanctions adopted by the US, UK and EU remains under constant review and, therefore, is subject to regular change. In addition to the programmes summarised herein, there may be additional sanctions and non-sanctions regimes applicable to particular transactions or activities.

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. This publication is intended as a general overview and discussion of the subjects dealt with, and does not create a lawyer-client relationship. DLA Piper will accept no responsibility for any actions taken or not taken on the basis of this publication.

