

To avoid the risk of engaging in trade business with a company or person who is sanctioned by the USA or any other entity, you can take several steps to ensure compliance with sanctions regulations. Here is a checklist to guide you through the process:

1. Understand the Sanctions

• Research Sanctions Lists:

- United Nations Security Council Sanctions
- US Department of the Treasury's Office of Foreign Assets Control (OFAC)
 - <https://sanctionssearch.ofac.treas.gov/>
- European Union Restrictive Measures (Sanctions)
 - <https://www.un.org/securitycouncil/sanctions/information>
 - Al-Shabaab
 - ISIL (Da'esh)& AlQaida
 - 1518 (Iraq)
 - The Democratic Republic of Congo
 - The Sudan
 - 1636 (Lebanon)
 - 1718 (DPRK)
 - Libya
 - 1988 (Afghanistan Taliban)
 - Guinea-Bissau
 - 2127 (Central African Republic)
 - 2140 (Yemen)
 - South Sudan
 - 2653 (Haiti)
- Country-specific sanctions lists

• Stay Informed:

- Subscribe to official sanctions list updates.
- Attend seminars and webinars on sanctions compliance.
- Consult with legal advisors specialized in international trade law.

2. Establish a Compliance Program

• Internal Policies:

- Draft a comprehensive sanctions compliance policy.
- Train employees on regulations and internal procedures.

• Due Diligence:

- Perform Know Your Customer (KYC) checks.
- Conduct Enhanced Due Diligence (EDD) for higher-risk clients.

• Screening:

- Implement a routine screening process against sanctions lists.
- Use software tools to assist with screening and record keeping.

3. Regular Screening and Monitoring

• Software Solutions:

- Invest in compliance and screening software.
- Regularly update the software to ensure it includes the latest sanctions lists.

- **Continuous Monitoring:**
 - Monitor existing clients and business partners regularly.
 - Respond promptly to sanctions list updates by re-screening as necessary.

4. Know the Products and Services

- **End-Use and End-User:**
 - Understand the potential end-use of your products and who the end-users are.
 - Ensure that your products are not used in a manner that violates sanctions.
- **Export Controls:**
 - Comply with relevant export control laws and regulations.
 - Classify your products correctly under the appropriate export control classification codes.

5. Reporting and Record Keeping

- **Documentation:**
 - Keep detailed records of all business transactions.
 - Maintain records of compliance efforts and due diligence performed.
- **Reporting Obligations:**
 - Be aware of any reporting obligations in the event of a potential sanctions breach.
 - Report any suspicious activities to the relevant authorities.

6. Legal Consultation and Review

- **Regular Audits:**
 - Conduct regular internal or third-party audits of your compliance program.
- **Legal Consultation:**
 - Consult regularly with legal experts to ensure your compliance program is up-to-date.
 - Seek legal advice if you identify any potential sanctions concerns.

7. Responding to Potential Violations

- **Incident Response Plan:**
 - Develop a plan for responding to potential sanctions violations.
 - Take immediate action if a potential violation is identified, including ceasing transactions and conducting an internal investigation.

8. Keep Abreast of Changes

- **Monitor Changes:**
 - Keep up-to-date with changes in sanctions regimes and adjust your compliance program accordingly.

By following this checklist, you can minimize the risk of engaging in trade with sanctioned entities and ensure that your business operations comply with international sanctions regulations. Always consult with legal experts specializing in sanctions and international trade law for the most accurate and current advice.

Risky Countries

- Afghanistan

- Belarus
- Central African Republic
- Democratic Republic of Congo
- Guinea-Bissau
- Iran
- Iraq
- Lebanon
- Libya
- Mali
- Myanmar
- North Korea
- Somalia
- Republic of the Sudan
- Russian Federation
- South Sudan
- Syria
- Ukraine
- Venezuela
- Yemen
- Zimbabwe