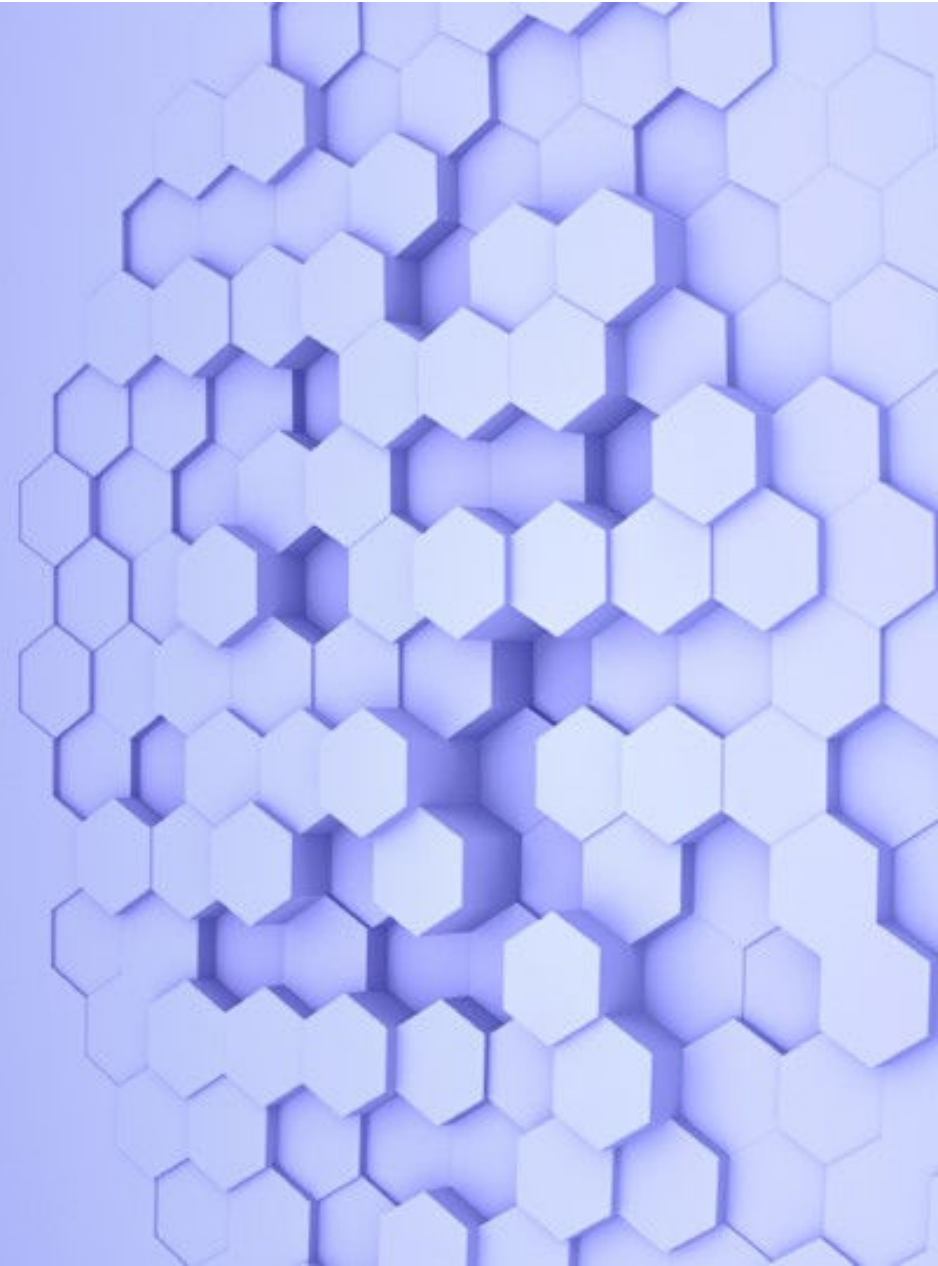


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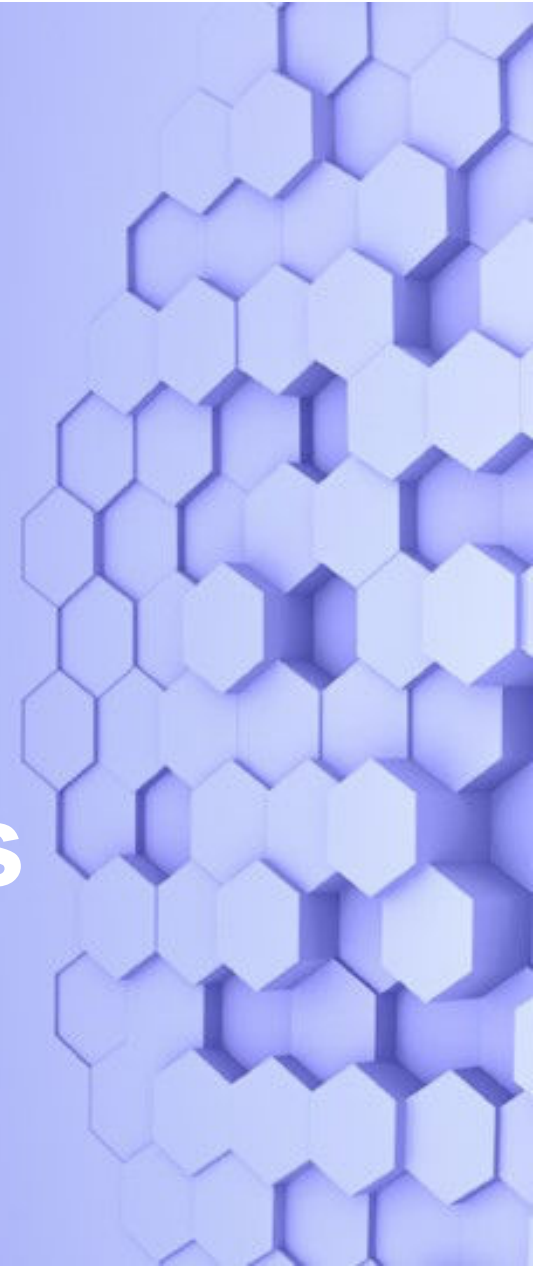
**Annual Compliance
Conference 2024**



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Sanctions and export controls

7 – 9 May 2024





Annual Compliance Conference 2024

01 Antitrust compliance
30 April – 1 May 2024

02 Sanctions and export controls
7 – 9 May 2024

03 Customs and key compliance developments
14 – 16 May 2024

04 Anti-bribery and corruption and economic crime
22 – 23 May 2024

05 ESG, supply chain and product compliance
3, 5 and 6 June 2024



Global strategies for handling sanctions regulators and enforcement

Wednesday 8 May 2024





Speakers



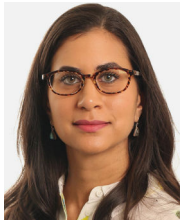
Sven Bates
Of Counsel (Chair)
London



Terry Gilroy
Partner
New York



Olof Konig
Partner
Stockholm



Meera Rolaz
Senior Associate
Zurich



Courtney Mackness
Associate
London





Discussion Topics

01 Introductions

02 Dialogues with Sanctions Authorities

03 Licensing

04 Investigations and Enforcement

05 Other Engagement Considerations





Dialogues with Sanctions Authorities

Enquiry

Licences

Responding to RFI

Disclosure

Reporting

Industry forums /
lobbying

Licensing & Notifications

Professional Services & Software



- Mapping business activities to identify relevant authorities
- Engagement with authorities to understand approach to licensing:
 - Entity level licences
 - Individual employee licences
- Different approaches across jurisdictions

Divestment



- Diverging approach re controlled goods in context of share sale
- Exit tax approvals
- Timing of completing divestment

Investigations & Enforcement



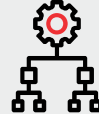
Seeds of Investigations

- Voluntary self-disclosures
- SARs
- Bank reporting
- Seizures of goods
- Journalist pieces



Russia: Learnings from First Wave

- Pushing boundaries of jurisdiction
- Increase in investigations
- Manpower increase
- Approach to level of fines



Cascading Investigations

- Cross-border collaboration
- Cross-governmental collaboration
- Investigations from other regulatory authorities



Process Considerations

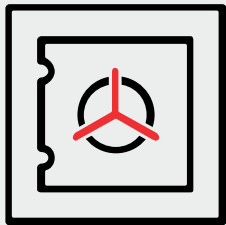
- Privilege
- Data custody
- Staffing
- Co-operation with authorities
- Data protection
- Employment



Penalties & Remediation

- Civil / criminal Liability
- DPAs
- Compliance Program Uplifts
- Termination of contracts

Other Engagement Points with Regulators



- Product classification enquiries
- Determinations of ownership & control
- Frozen asset reporting
- Exhausting licensing avenues (including to preserve litigation position)
- Wind down of business and settlement of disputes

Questions





Tomorrow's session

Global sanctions and export controls update

Thursday 9 May, 3.00 - 4.30 pm BST | 4.00 - 5.30 pm CEST | 10.00 - 11.30 am EDT



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