Baker McKenzie.

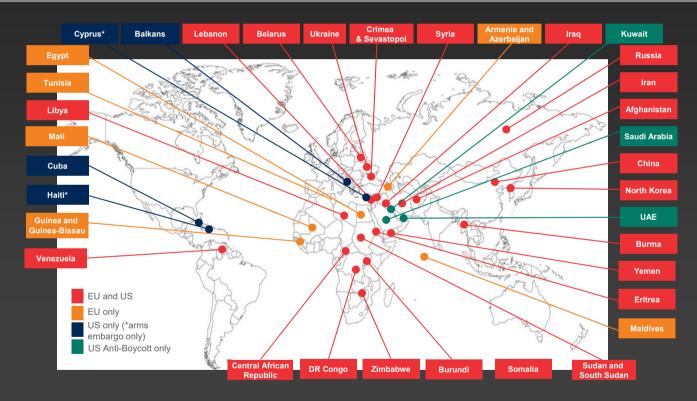
US and EU Sanction Update

Kerry Contini and Olof König

10:15-10:45



Current EU and US Sanctions Targets



UN, EU and US Designated Persons Programmes and TI Rankings

Country	U.N.	E.U.	US	TI 2017 CPI Ranking (total 180 countries)
Afghanistan				177
Belarus				=68
Bosnia		*		=91
Burma/Myanmar				=130
Burundi				=157
DR Congo				=161
Central African Republic				156
Cuba				=62
Egypt				=117
Eritrea		*		=165
Republic of Guinea				=148
Guinea-Bissau				=171
Iran				=130
Iraq				=169
Lebanon		*		=143
Libya				=171
Maldives		*		=112
Mali		*		=122
North Korea				=171
Russia				=135
Somalia				180
South Sudan				179
Sudan				=175
Syria				178
Tunisia				=74
Ukraine (incl. Crimea and Sevastopol)				=130
Venezuela				=169
Yemen				=175
Zimbabwe				=157
Balkans and ICT of Yugoslavia				N/A
Al-Qaida, ISIS and Terrorists				N/A



US Sanctions Target Groupings

>	Comprehensively Sanctioned Territories	Crimea, Cuba, Iran, North Korea, Syria	
>	Significant Sanctions	Russia, Venezuela	
>	Limited Sanctions	W. Balkans, Belarus, Burundi, Central African Republic, DR Congo, Iraq, Lebanon, Libya, Somalia, Sudan, South Sudan, Ukraine, Yemen, Zimbabwe	
>	Restricted Persons	 Specially Designated Nationals ("SDNs") Terrorists, WMD proliferators, human rights violators, malicious cyber-related activities, transnational criminal organizations, narcotics traffickers, Magnitsky, rough diamonds, etc. Foreign Sanctions Evaders, Sectoral Sanctions Entities 	



Russia Sanctions - Recap

- Complete US embargo of Crimea (since December 2014)
- Sanctioned (blocked) parties (SDNs)
 - Includes non-listed entities 50% or more owned by one or more SDNs
 - Targets prominent oligarchs, banks, and military companies, among others
- Sectoral Sanctions finance, defense, energy
- Export restrictions on items subject to US jurisdiction
 - Certain energy projects
 - Entity List
 - Military end-user/end-use restrictions
- CAATSA Secondary Sanctions



Russia Sanctions – Recent Developments

- April 6 SDN designations and corresponding wind-down general licenses
- Chemical and Biological Weapons Act Sanctions
 - Round 1 imposed already, Round 2 due in November export or import ban?
- CAATSA seconday sanctions developments
 - Issuance of Executive Order
 - Secondary sanctions imposed on Chinese entity, Equipment Development Department, and its director for significant transactions with Rosoboronexport; 33 persons added to Russian defense and intelligence sector list

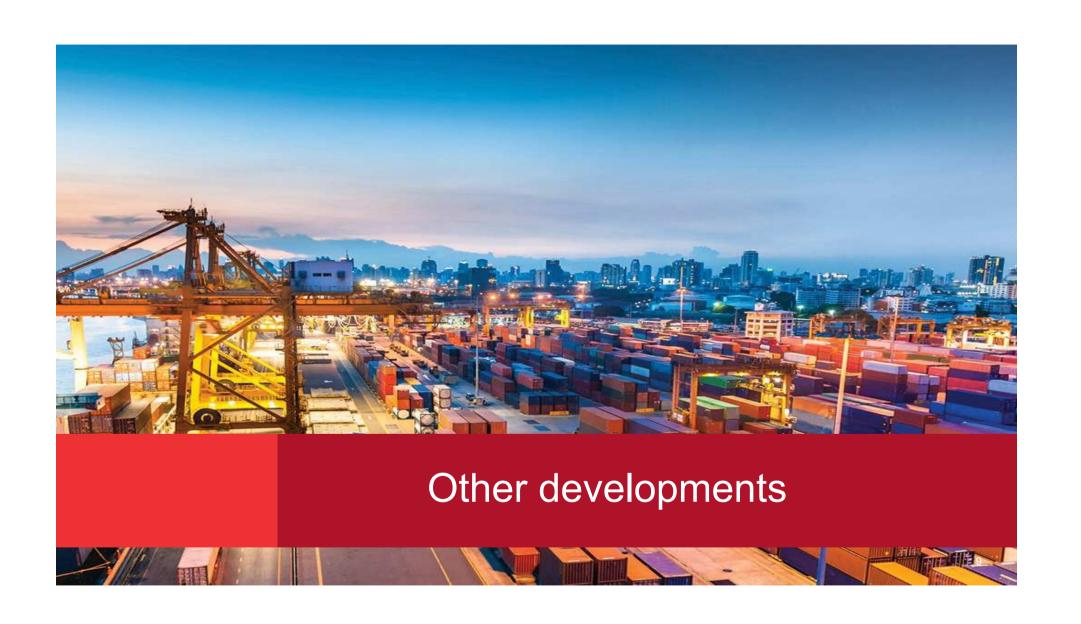
EU Sanctions

Recent Developments

Further DP listings

- Individuals involved in organisation of Russian presidential elections in Crimea and Sevastopol (May 2018)
- Six entities involved in construction of Kerch Bridge (July 2018)





Other Notable EU Updates

North Korea

- Expansion of investment ban to cover all EU investments in North Korea, in all sectors
- Numerous DP listings
- Other significant measures

Venezuela

- DP listings
- Arms embargo and sanctions product controls

Myanmar

- Strengthening of arms embargo
- DP listings in relation to serious human rights violations



Other Notable US Updates (1)

General

- New Executive Order imposing sanctions in the event of foreign interference in a United States election (no designations thus far)
- US Government to include digital currency addresses on SDN List
- Global Magnitsky Designations

North Korea

- US Government warns about North Korea links in supply chains and related sanctions risks
- Feb. 2018 sanctions targeting North Korea's shipping industry



Other Notable US Updates (2)

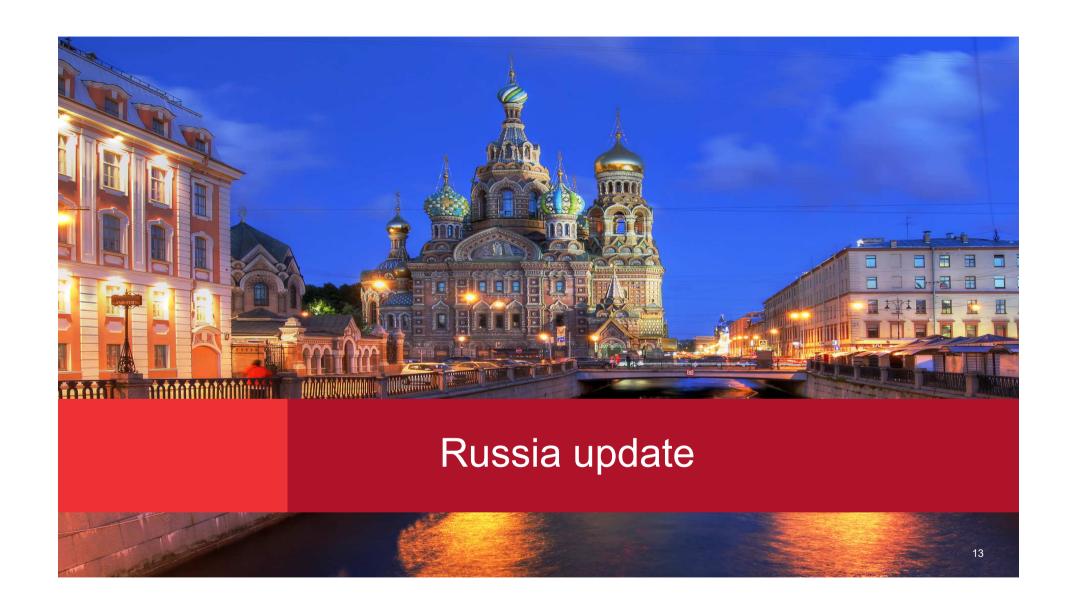
Venezuela

- Executive Order "Prohibiting Certain Additional Transactions with Respect to Venezuela," intended to prevent the Maduro regime from liquidating Venezuela's critical assets
- Executive Order "Taking Additional Steps to Address the Situation in Venezuela," specifically targeting the use of cryptocurrency

Enforcement

Foreign companies engaged in USD transactions





Russian Countermeasures

1. Federal Law No. 127-FZ "On Measures (Countermeasures) in Response to Unfriendly Actions of the USA and (or) other Foreign States" ("Law")

2. Draft Bill No. 464757-7 "Complying with Sanctions" or "Contributing to Sanctions"



Qatar update

Baker McKenzie.



Mathias Hansson
Partner
Baker McKenzie Stockholm
Mathias.hansson@bakermckenzie.com



Olof König Senior Associate Baker McKenzie Stockholm olof.konig@bakermckenzie.com



Sven Bates
Senior Associate
Baker McKenzie London
Sven.bates@bakermckenzie.com



Mattias Hedwall
Partner
Baker McKenzie Stockholm
mattias.hedwall@bakermckenzie.com



Kerry B. Contini
Partner
Baker McKenzie Washington DC.
Kerry.contini@bakermckenzie.com



Cindy Owens
Senior Associate
Baker McKenzie Singapore
Cindy.owens@bakermckenzie.com



Olof Johanesson Associate Baker McKenzie olof.johanesson@bakermckenzie.com

Baker McKenzie.

www.bakermckenzie.com

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