



Representative Legal Matters

Borys Y. Dackiw

Compliance Advisory and Risk Assessment

- Advising a major Gulf-based national oil company on undertaking a group wide compliance risk assessment and designing and implementing a monitoring and reporting tool to be undertaken as part of an on-going assessment of the effectiveness of the compliance program.
- Advising the marketing arm of a major Gulf state-owned petrochemicals and steel trading company in developing a compliance protocol for the Chinese market, and undertaken a legal, compliance and tax audit on their operations in Europe and India.
- Advising the distribution arm of a major Gulf-based national oil company on a full-scale review of their compliance related policies and procedures (P&P) to accommodate the requirements or approach followed under Saudi law and enforcement practice, in relation to the client's entry in the Saudi market.
- Advising a Saudi government procurement entity on the structuring of a full scale compliance program including drafting their Code of Ethics, Anti-Bribery & Corruption and Conflicts of Interest policies.
- Advising a multi-billion family-owned conglomerate on a compliance risk assessment across 15 group companies in the Middle East and Africa. The assessment focuses on anti-bribery & corruption, anti-money laundering and trade sanctions, including the drafting of a full suite of compliance policies and delivery of training.
- Delivered an anti-bribery & corruption and compliance training for the Middle East and Africa senior leadership team of a leading provider of international diagnostic services.
- Delivered an anti-bribery & corruption training to the Middle East leadership team of a US headquartered private military company, including on the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and Saudi anti-bribery laws.

- Advising a global software solutions company and undertaking a risk assessment on its regional business structure, management reporting lines and client support functions relating to the Israeli market from an Israeli boycott perspective; and on the provision of software services and payment channels to customers in Qatar in light of the Qatar embargo.
- Advising a global energy company and undertaking a risk assessment and the development of a white paper for the restructuring of supply chains and service lines for Qatar-related products and businesses; and the monitoring of the Qatar embargo and the impact on its supply chain including operational risks.
- Advising a global consumer goods manufacturer and undertaking a risk assessment on the sale of products to Iran under an OFAC AgMed General License and alternative payment channels, including through the UAE financial system, following the full re-imposition of US sanctions after the unilateral withdrawal of the US from the JCPOA in November 2018.

Investigations, Ethics and Regulatory

- Advised a European headquartered wealth management and banking group in an internal investigation into allegations of fraud and embezzlement by the former employee of the client's representative office in Dubai and on criminal proceedings and various reporting obligations to regulatory authorities.
- Advising a Swiss pharma group in an ongoing investigation involving allegations of fraud, bribery and other misconduct by their third party distributors and other business partners in Saudi Arabia and the UAE.
- Advising a multinational consumer electronics company in an ongoing investigation into allegations of fraud, bid-rigging and other misconduct by senior managers responsible for their Morocco and Libyan operations.
- Advising a leading provider of international diagnostic services on an internal investigation into allegations raised by a whistle-blower into financial and compliance irregularities and fraud in the UAE, including advice on strategy, preservation of evidence and data protection as well as carrying out the primary interview with the whistle-blower.
- Advising a large joint venture company operating in the UAE and Qatar in auditing and monitoring compliance with local and international standards in recruitment, human rights and labour practice across UAE and Qatar together with recruitment source countries including in Asia and Africa.
- Supported a global technology and telecoms services company in defending an investigation by the US Office of Foreign Assets Control (OFAC) in respect of alleged violations of US sanctions laws, covering conduct relating to parties subject to US sanctions in the Middle East.

- Acting for the world's largest distributor for a U.S.-based fast moving consumer goods group in relation to an internal investigation (culminating in a voluntary self-disclosure to OFAC) of alleged breaches of US trade sanctions against Iran, and advising on and drafting a sanctions policy and compliance training program.
- Advised a global industrials company on an investigation into embezzlement claims and compliance issues, following its global acquisition of another major player in this sector and its rapid expansion across the MENA region. This included filing claims with the UAE civil and criminal courts against the individuals involved and identifying remedial measures for the client to assist with their compliance programs and processes.
- Advised a European-headquartered corporate and investment bank in connection with its disclosure and other legal obligations in relation to breaches of trade sanctions laws, in the context of the appointment of a monitor to enforce obligations imposed by US regulatory authorities under a cease and desist and deferred prosecution agreement.
- Advised a global insurance company on its potential notification obligations to local regulators in light of extensive breaches of sensitive personal data by one of its employees.

Trade Sanctions and Export Controls

- Advising one of the largest commodities trading groups in the MENA region, in relation to UN, US, UK and EU sanctions relating to Iran, Iraq and Belarus.
- Advising a Saudi Arabian telecoms services company on Iran sanctions related matters.
- Advising a global consumer goods manufacturer on trade sanctions matters, including the application of the UAE's Targeted Financial Sanctions regime to commercial arrangements in Yemen.
- Advising a global technology company on the UAE's Anti-Money Laundering / Counter Terrorist Financing and Targeted Financial Sanctions regime.
- Advising an international energy company on Russian sanctions in relation to services provided to a Russian refining facility and tax and other payments to the Russian government.
- Advising multinational luxury goods company on the sale of luxury goods items to Russian sanctioned parties.
- Advising the shipping and logistics arm of a major Gulf-based national oil company on trade sanctions risk mitigation measures in connection with the shipment of product on the company's vessels.
- Advising a global management consultancy company on various aspects of the Arab League Boycott of Israel.

- Advising major multinationals operating in the Middle East on the impact of the Qatar diplomatic crisis and how to adapt their business operations and manage supply chain disruption in compliance with the embargo imposed on Qatar by four Gulf states, including Saudi Arabia and the UAE.
- Advising numerous global clients on navigating regional trade sanctions and embargos (relating to Qatar and the Arab League Boycott of Israel) and structuring supply chains to mitigate the risk of breaching regional sanctions regimes and the U.S. anti-boycott laws.

Foreign Direct Investments and M&A

- Advised Leemar Investments FZE on the USD100 million investment in and acquisition of a 50% stake in SUSHISAMBA, a global restaurant business known for its unique fusion of Japanese and South American cuisine, including the formation of a joint venture and global tax structuring for its expansion into new markets.
- Advised Palfinger AG (Austria) on the acquisition of three Megarme Group companies in the UAE and Qatar.
- Advised National Metal Manufacturing and Casting Co (Maadaniyah), the Saudi-listed firm, on its acquisition of a UAE firm specialized in manufacturing and marketing of drawn wire and related products.