

Navigating Economic Sanctions

Delivering critical insight, analysis, and guidance to help you stay ahead of risk and effectively manage challenges presented by complex economic sanctions regimes. Our team of sanctions experts have extensive experience addressing compliance, due diligence, political risk, and many other aspects of sanctions across many different industries. Our services include:

Due Diligence and Managing Risk

Country or Sector Sanctions Risk Reports. Country or market sector-specific assessments of sanctions risk, including:

- ⇒ Scope of current sanctions
- ⇒ Analysis of relevant sanctions enforcement activity
- ⇒ Potential future sanctions implications
- ⇒ Guidance on permissible business activities and reducing sanctions risk exposure

Sanctions Due Diligence Reports. Pre-engagement or pre-investment due diligence reports covering:

- ⇒ Comprehensive review of ownership and control of target entities
- ⇒ Intelligence-based analysis of target entities' direct and indirect ties exposure to sanctioned countries or parties
- ⇒ Assessment of sanctions vulnerability
- ⇒ Overall sanctions risk profile of the target entities

Sanctions Vulnerability Report. Identifying and delineating sanctioned parties' assets, interests, and general influence within a specific industry sector or jurisdiction, in order to help clients isolate risk and manage exposure.

Sanctions Exposure Report. Analysis of acquisition target's or third party's direct and indirect exposure to sanctioned countries and parties.

OFAC Regulatory and Licensing Guidance. Guidance on OFAC regulations and OFAC's licensing process, as well as preparation of **OFAC license applications, mandatory reporting, and disclosures.**

High-Risk Jurisdictions. Guidance on controlling sanctions risk exposure and conducting permissible business in jurisdictions with higher sanctions risk.

Sanctions Risk Monitoring. Ongoing monitoring of portfolio company or third party data to identify evolving sanctions risks

Compliance Program Development and Enhancement

Compliance Program Development. Developing sanctions compliance programs that meet or exceed industry standards and regulatory expectations without being unnecessarily restrictive, including:

- ⇒ Management posture
- ⇒ Internal controls
- ⇒ Policies and procedures
- ⇒ Auditing and testing
- ⇒ Training

Compliance Program Assessment. Detailed assessment of existing compliance program, including guidance on enhancing controls, and remediating technical and non-technical compliance issues.

Regulatory Change Management. Provide updates, analysis, and guidance concerning business-relevant regulatory developments including the imposition of new sanctions, issuance of general licenses, or changes to existing regulations.

Sanctions Training. Practical and customized sanctions training for compliance and legal teams, researchers, analysts, executives officers, and boards.

Investigating and Resolving Challenges

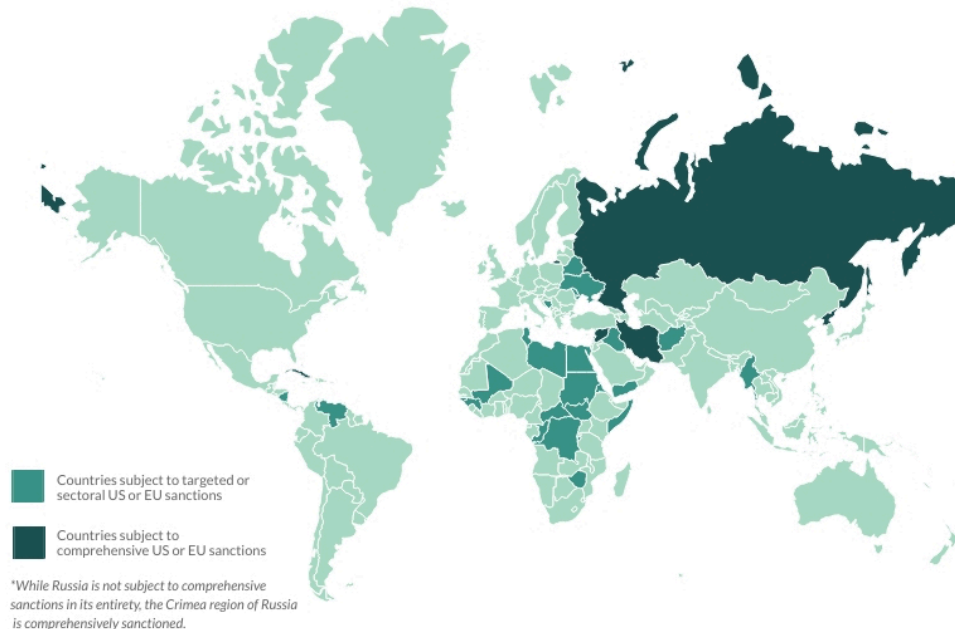
Investigations. Investigations of potential sanctions breaches, conducted through:

- ⇒ Business intelligence and due diligence
- ⇒ Staff interviews
- ⇒ Data review and analytics
- ⇒ Auditing

Potential Violations. Guidance on addressing potential breaches of sanctions regulations, implementing remedial measures, and assistance in preparing **OFAC voluntary self-disclosures.**

Our Prior Engagements

We work across many different industries and locations around the world. Our clients include banks, corporations, non-profits, start-ups, tech companies, medical organizations, law firms, trade associations, and individuals. Some of our past projects are listed detailed below.



- ⇒ Advised technology company on its exposure and possible financial and reputational risks of entering a partnership with Russian company already partnered with another company owned by an OFAC SDN.
- ⇒ Performed comprehensive sanctions risk analysis and due diligence for PE firm evaluating an acquisition target with mining activities in Russia and parts of Africa.
- ⇒ Advised NGO on providing relief aid to Syria. Conducted an investigation of past activities, prepared OFAC license application, helped develop a full compliance program, and designed and delivered sanctions training to key personnel.
- ⇒ Prepared a comprehensive summary of sanctions regulations and their applicability to various business activities for a Brazilian multinational company.
- ⇒ Designed and delivered a rigorous 2-month training program for the newly established LATAM-region sanctions compliance team of a large international bank.
- ⇒ Developed comprehensive sanctions compliance program for tech start-up. Retained to advise on sanctions developments and prepare formal requests for OFAC guidance.
- ⇒ Assisted large U.S. financial institution with conducting remedial review of 200+ clients presenting heightened sanctions risk. Prepared OFAC Voluntary Self Disclosures concerning potential sanctions breaches uncovered during review.
- ⇒ Delivered Sanctions Exposure Reports and ongoing sanctions risk monitoring of portfolio companies and their primary relationships to PE firm. Provided timely notice of new sanctions risk developments and supplementary consulting on managing evolving sanctions risks.
- ⇒ Developed and maintained a sanctions regulations reference guide for a financial services company summarizing all U.S. and E.U. sanctions programs and countermeasures
- ⇒ Retained by regional southeast-Asian bank to advise in-house compliance team on all U.S. sanctions-related matters on an ongoing basis. Managed OFAC communications and prepared OFAC Applications for Licenses to Unblock Funds on behalf of the bank.
- ⇒ Advised cryptocurrency exchange on sanctions regulations and risk exposure, and helped design comprehensive controls to mitigate risk.