

Navigating sanctions regimes

The US's greater use of sanctions to achieve foreign policy goals, and the complexity of US, EU and other countries' sanctions regimes, is causing organisations to reconsider their governance of and approach to sanctions. Our extensive experience in political risk, compliance, due diligence, data analytics and forensic investigations gives us a unique blend of skills to support our clients and their legal counsel as they consider sanctions compliance. We help you with:

Deliver growth and new opportunities

- ▶ Country-level assessments of the focus, breadth and enforcement history of sanctions, and advice on how to do business in countries where sanctions regimes are changing
- ▶ Pre-relationship or pre-investment due diligence into the ownership and control of specific entities, including assessments of the vulnerability of an entity or individual to being sanctioned in the future
- ▶ Mapping of sanctioned entities' and individuals' business interests in a given sector or country so you can proactively control your exposure to them
- ▶ Books and records checks, and data analytics, to evaluate an acquisition target's or distributor's exposure to sanctioned countries and entities

Investigate and resolve problems and crises

- ▶ Investigations into sanctions breaches, including:
 - ▶ Data collection, hosting, review and analytics
 - ▶ Forensic accounting
 - ▶ Employee interviews
 - ▶ Business intelligence and due diligence

- ▶ Assessments of the implications of existing third parties being sanctioned and advice about how to react
- ▶ Remedial steps to improve sanctions compliance after an investigation

Improve governance and compliance processes

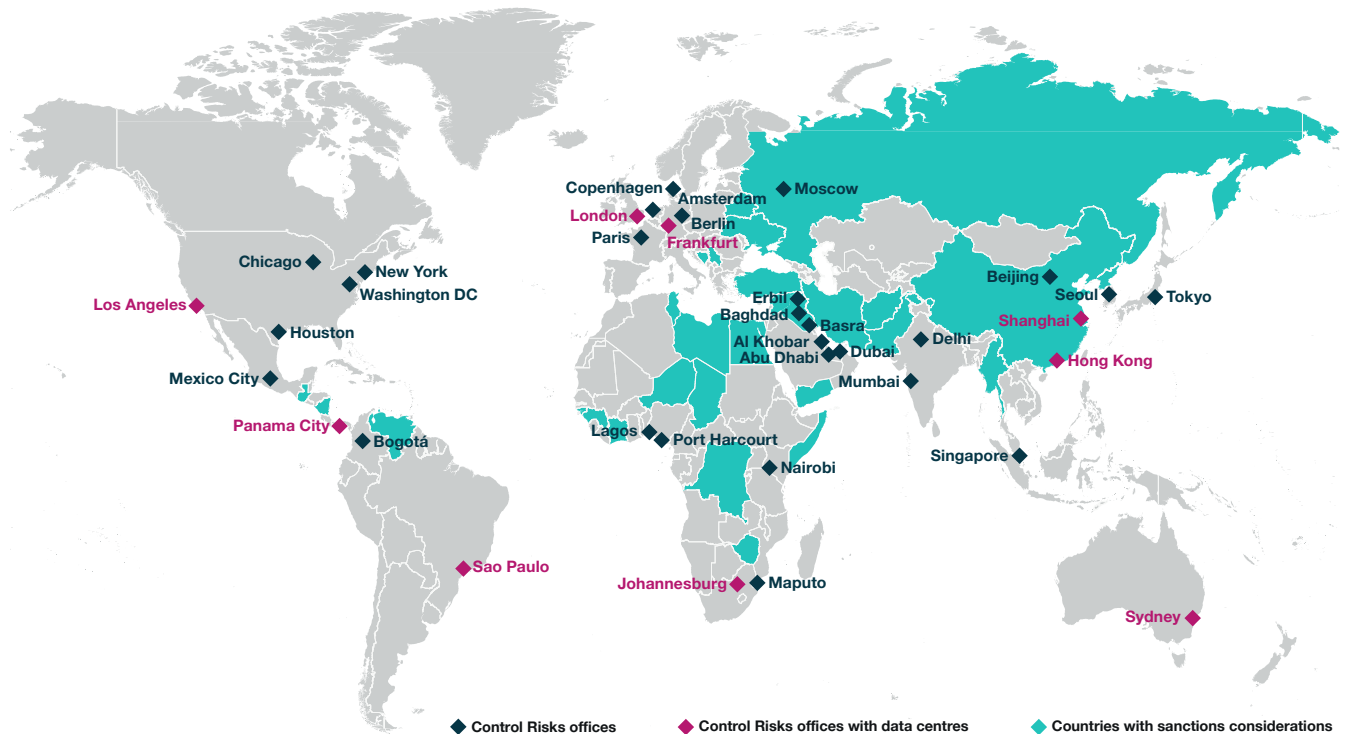
- ▶ Developing and implementing sanctions compliance programmes that build on guidance from governments and the lessons learnt from enforcement cases relevant to your industry, including:
 - ▶ Management tone
 - ▶ Risk assessments of countries and relationships
 - ▶ Internal control development
 - ▶ Auditing and testing existing processes
 - ▶ Training for employees and third parties
- ▶ Monitoring of changes to the focus, breadth and enforcement of sanctions across a portfolio of countries
- ▶ Developing third-party due diligence programmes suited to identifying ownership and control structures
- ▶ Proactive monitoring of third-party data to identify connections to sanctioned entities or countries

Control Risks exists to make our clients succeed. We are a specialist risk consultancy that helps to create secure, compliant and resilient organisations in an age of ever-changing risk.

Control Risks' 3,000 employees work out of 36 offices around the world with experience in 178 countries and 18 sectors. With experts strategically placed around the world, we have a unique blend of skills and local insights to support our clients and their legal counsel as they consider sanctions globally.

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Our experience with sanctions



- ▶ Advised a chemical company on their exposure to the shareholders of a **Russian** partner; the nuances of entities part-owned by sanctioned individuals; and the risks of secondary sanctions for similar companies.
- ▶ Delivered a country risk assessment and multiple enhanced due diligences for a multinational bank considering whether to finance a multi-billion-dollar transaction with **Iran** under an OFAC licence.
- ▶ Investigated the sale of electronics in **North Korea** on behalf of a Japanese client. Advised on potential sanctions considerations and provided recommendations for export controls enhancements.
- ▶ Mapped the business interests of major sanctioned entities in **Iran's** consumer goods sector, enabling a client to place informed restrictions on marketing and sales activities of distributors.
- ▶ Advised an international oil company on the likely future sanctions the US and the international community will implement against **Venezuela**.
- ▶ Advised a multinational engineering company on the possible reputational risks of partnering with sanctioned companies in **Myanmar**.
- ▶ Developed a bespoke database that detailed key **global (UN, EU and US) and third country sanctions** regimes on dozens of countries of commercial interest to a multinational chemical company. Delivered information at regular risk-based intervals, with supplementary consulting and monitoring of significant political or legal developments which could impact the client's exposure.
- ▶ Conducted an assessment of the oil output implosion in **Venezuela** and how oil production is expected to be impacted by tighter US sanctions in the future.
- ▶ Provided a nuanced assessment of sanctions, their applicability and political motivations for a Japanese conglomerate. The client then formulated a strategy that serves as the foundation of a sanctions-related policy in **Russia**.
- ▶ Conducted a scenario planning exercise for a manufacturing multinational that included a view of how tighter international sanctions could affect their business with **Iran** and how to mitigate the associated sanctions risk.



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