

## Economic and Trade Sanctions

*The challenge in the Middle East*



### The sanctions challenge

The risks posed by economic sanctions should not be underestimated; establishing which regime(s) apply to which customer and which transaction can be complicated. Sanctions can apply to:

- Individuals
- Entities and Groups
- Ports
- Vessels
- Countries

The **responsibility for interpreting and implementing sanctions regimes rests with businesses**. As the regimes and lists are continually evolving, including the creation of new sanctions and the lifting of old ones, it is important for businesses to stay on top of the latest developments.

**Our sanctions experts are here to help you.**

### A key geographical location

Sanctions pose a **particular risk in the Middle East**, which occupies a key geographical location; numerous sea routes and ports cross through the region and it is close to countries subject to current sanctions restrictions (e.g. Iran and the Republic of Sudan). Many clients therefore face sanctions challenges regularly.

### The cost of non-compliance

Sanctions breaches carry **significant costs** both in the Middle East and globally, from the **people effort required** and **fees** related to investigating breaches to the effort of **improving systems and controls**. If a breach does occur, **enforcement actions** can be onerous (including **fines** in the hundreds of millions of dollars), and often result in **reputational damage** and increased **regulatory scrutiny**.

### Sanctions compliance strategy

The strategy for sanctions compliance should ideally operate on a **risk-based continual loop**. This means that information obtained from the results of sanctions screening, regulators, industry peers, internal audit, compliance reviews, and any other relevant sources, should feed back into the consideration of the sanctions risk assessment and the strategy for the organisation.

### Our experience

We help our clients to **react quickly and confidently** in a crisis, investigation or dispute. We have assisted a range of organisations, both in the Middle East and globally, to enhance their economic and trade sanctions programs and we are committed to providing you with targeted advice and support.

### Our services

#### Implementation and governance

- Sanctions risk assessment
- Policies, procedures & controls design and review
- Sanctions training & awareness
- Filter selection, customisation & implementation

#### Investigations

- Retrospective reviews
- Internal / targeted investigations
- Reviews of specialised transactions

#### Optimisations

- Sanctions program health checks
- Sanctions benchmarking
- Policies, procedures, and controls gap analysis

#### Due Diligence (DD)

- Sanctions risk assessments and investigative DD
- Evaluation of sanctions compliance & controls
- Transaction and/or filter testing
- Identification of potential issues, remedial actions and risk factors affecting deal pricing

### We are here to help. Get in touch.

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