International Iran Sanctions Database

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Introduction

The U.S. is not the only country to institute sanctions against Iran. The 15-member United Nations Security Council adopted four rounds of sanctions against Iran between 2006 and 2010, underlining the multilateral nature of pressure on the Islamic Republic.

The European Union (EU), South Korea, Japan, Canada, and Australia followed suit with their own individual sets of robust sanctions. These sanctions primarily target energy-related investments in Iran, further inhibiting the country's foreign investment–starved oil and gas projects. The United Kingdom, following Brexit, has maintained much of the European Union's sanctions architecture as many were levied pursuant to U.N. Security Council resolutions.

However, the four rounds of U.N. Security Council sanctions adopted between 2006 and 2010 were conditionally terminated in January 2016 as a result of the JCPOA, and remain terminated to this day despite Iran's current significant non-performance of its Joint Comprehensive Plan of Action (JCPOA) obligations. Likewise, the EU, South Korea, Japan, Canada, and Australia terminated their nuclear-related sanctions in 2016 and have yet to reinstitute them. Given the current geopolitical divisions in the U.N. Security Council, it will be difficult to reconstruct support for sanctions resolutions against the Islamic Republic. This is why Washington and its allies should support invoking the snapback sanctions mechanism under U.N. Security Council Resolution 2231, which endorsed the JCPOA.

Here is a UANI database of international sanctions against Iran.





United States

U.S. sanctions against Iran come in three forms: legislation by Congress, executive orders by the president, and other regulations by the executive branch.

- 15 April 2021: Executive Order 14024 (presently in force) is issued to block property with respect to specified harmful foreign activities of the government of the Russian Federation. Among other things, the order targets persons determined to be responsible for or complicit in "activities that undermine the peace, security, political stability, or territorial integrity of the United States, its allies, or its partners." The U.S. government has issued sanctions against Iran under this authority for its support for Russia's war in Ukraine.
- 21 September 2020: Executive Order 13949 (presently in force) is issued, instituting sanctions targeting conventional arms activities in Iran. All property in the U.S. belonging to any person who the Secretary of the Treasury and the Secretary of State determine to have engaged in any of the following activities is blocked:
 - The "supply, sale, or transfer...of arms and related materials, including spare parts" to the benefit of Iran;
 - The provision "to Iran of any technical training, financial resources, or services...related to the supply, sale, transfer, manufacture, maintenance, or use of arms and related material."
- 10 January 2020: Executive Order 13902 (presently in force) is issued, instituting sanctions targeting Iran's construction, mining, manufacturing, and textile sectors. Sanctions include asset freezes and denial of entry into the U.S. for those operating in or providing support for these sectors. The EO also authorizes the Secretary of the Treasury to sanction financial institutions that knowingly conduct or facilitate transactions for or on behalf of any of the aforementioned sanctioned persons. Those sanctions include a ban on opening, or strict conditions on maintaining, of correspondent and pass-through accounts.
- 24 June 2019: <u>Executive Order 13876</u> (presently in force) is issued, instituting sanctions, including seizure of property and



denial of entry into the U.S., against Iranian Supreme Leader Ali Khamenei and his network. Those sanctioned include the following:

- Supreme Leader Khamenei;
- Khamenei's office;
- state officials appointed by Khamenei or his office;
- state officials appointed by state officials who themselves are appointed by him or his office;
- heads of Iranian entities in Iran, or heads of Irancontrolled entities outside Iran, who are appointed by persons who themselves are appointed by him or his office;
- providers of support for any of the aforementioned sanctioned persons;
- recipients of contributions from any of the aforementioned sanctioned persons;
- those who own, control, or serve as agents for any of the aforementioned sanctioned persons; and
- board members or senior executive officers of any of the aforementioned sanctioned persons.

The EO also authorizes the Secretary of the Treasury to sanction financial institutions that knowingly conduct or facilitate transactions for or on behalf of any of the aforementioned sanctioned persons. Those sanctions include a ban on opening, or strict conditions on maintaining, of correspondent and pass-through accounts.

- 8 May 2019: Executive Order 13871 (presently in force) is issued, instituting sanctions against Iran's minerals and metals sectors. The property of any person determined by the Secretary of the Treasury and the Secretary of State to be conducting business operations in the "iron, steel, aluminum, or copper sector of Iran" is blocked. Additionally, the Secretary of the Treasury is authorized to bar any foreign financial institution determined to have knowingly conducted a financial transaction "for the sale, supply, or transfer to Iran of significant goods or services used in connection with the iron, steel, aluminum, or copper sectors of Iran."
- 23 October 2018: The <u>Hizballah International Financing</u>

 Prevention Amendments Act of 2018 (presently in force) is enacted, authorizing freezing of property and financial transactions, banning entry into the U.S., and revoking visas of any foreign person who "knowingly provides significant financial, material, or technological support" to Hezbollah or its



agents or affiliates. The legislation also authorizes freezing property and financial transactions of any "agency or instrumentality of a foreign state" (i.e., Iran) that "conducted significant joint combat operations with, or significantly supported combat operations of" Hezbollah or "provided significant financial support for or to, or significant arms or related materiel to" Hezbollah.

- 6 August 2018: Executive Order 13846 (presently in force) is issued after the U.S. withdrawal from the Joint Comprehensive Plan of Action (JCPOA) (also known as the Iran nuclear deal). This EO reimposes sanctions that the Obama administration had revoked pursuant to the JCPOA. The sanctions in question were instituted in EOs 13574, 13590, 13622, and 13645, all of which had been revoked in 2016 by EO 13716. This EO also continues in effect sanctions authorities created in EOs 13628 and 13716.
- 20 December 2017: Under the authority vested in the
 President of the United States by the Global Magnitsky Human
 Rights Accountability Act, and other U.S. legislation, <u>Executive</u>
 Order 13818 is issued, blocking the property in the U.S. of any
 foreign person determined to be:
 - "Responsible for or complicit in, or to have directly or indirectly engaged in, serious human rights abuses";
 - "A current or former government official, or a person acting for or on behalf of such an official...responsible for or complicit in, or directly or indirectly engaged in corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources or bribery."

The Global Magnitsky Human Rights Accountability Act (passed in 2016) authorizes the President to levy sanctions against such persons regardless of their geographical location. Executive Order 13818, which implements the act, represented a **departure** from previous sanctions regimes, which targeted individuals and entities from specific countries.

2 August 2017: The <u>Countering America's Adversaries</u>
 <u>through Sanctions Act</u> (CAATSA) (presently in force) is
 enacted, requiring sanctions under <u>Executive Order 13324</u> to
 be applied to Iran's Islamic Revolutionary Guard Corps (IRGC)
 and IRGC officials, agents, and affiliated entities. EO 13224
 authorizes freezing the assets of persons and entities that:



- "Pose a significant risk of committing, acts of terrorism that threaten the security of U.S. nationals or the national security, foreign policy, or economy of the United States":
- "Are owned or controlled by, or to act for or on behalf of those persons...";
- "Assist in, sponsor, or provide financial, material, or technological support for, or financial or other services to or in support of, such acts of terrorism" or persons sanctioned under this EO; or
- "Are otherwise associated with" those sanctioned under this EO.
- 16 January 2016: Executive Order 13716 (parts of which remain in force) is issued to implement U.S. commitments made in the Joint Comprehensive Plan of Action (JCPOA) (also known as the Iran nuclear deal). Among other things, this EO:
 - Revokes EOs <u>13574</u>, <u>13590</u>, <u>13622</u>, and <u>13645</u>, and consequently terminates the sanctions in those documents;
 - Amends EO <u>13628</u> to remove sanctions related to sales of, purchases of, support to, and other activities regarding Iranian refined petroleum products and infrastructure:
 - Authorizes implementation of existing sanctions outside the scope of the JCPOA, including certain provisions of the Iran Freedom and Counter-Proliferation Act that institute sanctions on persons involved in Iran's energy, shipping, or shipbuilding sectors, or on Iranians on the U.S. Treasury Department's Specially Designated Nationals and Blocked Persons list;
 - Authorizes new sanctions outside the scope of the ICPOA, including:
 - banning loans from U.S. financial institutions to;
 - banning foreign-exchange transactions falling under U.S. jurisdiction involving;
 - banning payments and credit transfers falling under U.S. jurisdiction involving;
 - freezing property and property interests of;
 - prohibiting U.S. persons from investing in or buying significant amounts of equity or debt instruments from;



- restricting or banning imports into the U.S. from; and
- banning entry into the U.S. by sanctioned persons under the Iran Freedom and Counter-Proliferation Act; and
- Authorizes the new sanctions above on persons involved in or providing support for corruption or other activities involved in diverting goods intended for the Iranian people.
- 18 December 2015: The <u>Hizballah International Financing</u>
 <u>Prevention Act</u> (presently in force) is enacted, keeping financial institutions that conduct transactions with Hezbollah or its subsidiaries or agents out of the U.S. financial system. Among other things, the measure:
 - Requires the president to block property transactions, bar entry into the U.S., and revoke visas of any foreign individual or entity that provides significant support to some Hezbollah affiliates or that raises funds for Hezbollah;
 - Requires the president to seize the property of any agent or foreign state instrumentality that has supported or engaged in combat operations with Hezbollah; or given significant financial or military support for Hezbollah;
 - Requires the president to seize the property of Hezbollah-affiliated networks, including those involved in significant transnational crime; and
 - Authorizes the President to create "enhanced due diligence policies" for foreign financial institutions regarding correspondent or payable-accounts.
- 3 June 2013: Executive Order 13645 (presently in force) is issued, authorizing sanctions that include:
 - Banning the opening and banning or strictly conditioning the maintenance of payable-through or correspondent accounts by, or freezing all property or property interests of, foreign financial institutions that knowingly conducted or facilitated significant transactions regarding the purchase or sale of Iranian rials or contracts whose value are based on the rial's exchange rate, or maintained significant funds or accounts outside Iran that were denominated in the rial;



- Freezing the property and property interests of any person found to have "materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, any Iranian person included on the [U.S. State Department's] list of Specially Designated Nationals and Blocked Persons";
- Banning the opening, and banning or strictly conditioning the maintenance, of payable-through or correspondent accounts by foreign financial institutions that knowingly conduct or facilitated significant transactions for any Iranian person included on the [U.S. State Department's] list of Specially Designated Nationals and Blocked Persons or for the sale, supply, or transfer to Iran of significant goods or services used in connection with Iran's automotive sector;
- Denying Export-Import Bank guarantees, insurance, extension of credit, or participation in such an extension for export of any goods or services to the sanctioned person;
- Denying any specific license or other specific permission or authority required to export or re-export goods or technology to the sanctioned person;
- Taking "such actions as they deem appropriate" by the Federal Reserve's chairman and the president of the New York Federal Reserve Bank, including denying or terminating designation of the sanctioned person "as a primary dealer in U.S. government (USG) debt instruments";
- Barring the sanctioned person from serving as a USG agent or a repository for USG funds;
- Barring agencies from procurement or contracting for procurement from the sanctioned person; and
- Denying a visa and excluding from the U.S. "a corporate officer or principal of, or a shareholder with a controlling interest in, a sanctioned person."

The EO also may apply the following sanctions to persons sanctioned pursuant to section 1244(d)(1)(A), 1245(a)(1), or 1246(a)(1) of the Iran Freedom and Counter-Proliferation Act:

 "Prohibit[ing] any United States financial institution from making loans or providing credits to the sanctioned person totaling more than \$10,000,000 in



- any 12-month period, unless such person is engaged in activities to relieve human suffering and the loans or credits are provided for such activities";
- "Prohibit[ing] any transactions in foreign exchange that are subject to the jurisdiction of the United States and in which the sanctioned person has any interest";
- "Prohibit[ing] any transfers of credit or payments between financial institutions or by, through, or to any financial institution, to the extent that such transfers or payments are subject to the jurisdiction of the United States and involve any interest of the sanctioned person";
- Freezing "all property and interests in property that are
 in the United States, that hereafter come within the
 United States, or that are or hereafter come within the
 possession or control of any United States person
 (including any foreign branch) of the sanctioned
 person, and provide that such property and interests
 in property may not be transferred, paid, exported,
 withdrawn, or otherwise dealt in";
- "Prohibit[ing] any United States person from investing in or purchasing significant amounts of equity or debt instruments of a sanctioned person";
- "Restrict[ing] or prohibit[ing] imports of goods, technology, or services, directly or indirectly, into the United States from the sanctioned person"; or
- "Impos[ing] on the principal executive officer or officers, or persons performing similar functions and with similar authorities, of a sanctioned person [the aforementioned sanctions pursuant to section 1244(d)(1)(A), 1245(a)(1), or 1246(a)(1) of the Iran Freedom and Counter-Proliferation Actl."

The EO also seizes the property and property interests, within U.S. jurisdiction, of persons who are found:

- To have engaged, on or after January 2, 2013, in corruption or other activities relating to the diversion of goods, including agricultural commodities, food, medicine, and medical devices, intended for the people of Iran;
- To have engaged, on or after January 2, 2013, in corruption or other activities relating to the misappropriation of proceeds from the sale or resale of goods described in subsection (a)(i) of this section;



- To have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the activities described in subsection (a)(i) or (a)(ii) of this section or any person whose property and interests in property are blocked pursuant to this section; or
- To be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to this section.
- 2 January 2013: The <u>Iran Freedom and Counter-Proliferation Act of 2012</u> (IFCA) (presently in force) is enacted as part of the National Defense Authorization Act for fiscal year 2013. Among other provisions, the legislation:
 - Designates port operators in Iran and entities in Iran's energy, shipping, and shipbuilding sectors, including the National Iranian Oil Company (NIOC), the National Iranian Tanker Company (NITC), the Islamic Republic of Iran Shipping Lines (IRISL), and the affiliates thereof, as entities of proliferation concern;
 - Requires the president to freeze, and ban transactions in, the property of any person who is a port operator in Iran; is part of Iran's energy, shipping, and shipbuilding sectors; or "knowingly provides significant financial, material, technological, or other support to, or goods or services in support of any activity or transaction on behalf of or for the benefit of" the sanctioned persons mentioned immediately above;
 - Requires the president to impose at least five out of a menu of sanctions, and permits him to also impose the following sanctions, on a person who "sells, supplies, or transfers to or from Iran... significant goods or services used in connection with the energy, shipping, or shipbuilding sectors of Iran, including [NIOC, NITC, and IRISL]": "prohibit[ing] any United States financial institution from making loans or providing credits to the sanctioned person totaling more than \$10,000,000 in any 12-month period, unless such person is engaged in activities to relieve human suffering and the loans or credits are provided for such activities"; "prohibit[ing] any transactions in foreign exchange that are subject to the jurisdiction of the United States and in which the sanctioned person has any interest"; "prohibit[ing] any



transfers of credit or payments between financial institutions or by, through, or to any financial institution, to the extent that such transfers or payments are subject to the jurisdiction of the United States and involve any interest of the sanctioned person"; "[freezing] all property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person (including any foreign branch) of the sanctioned person, and provide that such property and interests in property may not be transferred, paid, exported, withdrawn, or otherwise dealt in"; "prohibit[ing] any United States person from investing in or purchasing significant amounts of equity or debt instruments of a sanctioned person"; "restrict[ing] or prohibit[ing] imports of goods, technology, or services, directly or indirectly, into the United States from the sanctioned person"; or "imposing on the principal executive officer or officers, or persons performing similar functions and with similar authorities, of a sanctioned person [the aforementioned sanctions]..."

- Authorizes imposition of at least five out of the aforementioned menu of sanctions on the buying of petroleum or petroleum products from Iran;
- Authorizes sanctions on a person who "conducts or facilitates a financial transaction for the sale, supply, or transfer to or from Iran of natural gas";
- Authorizes imposition of at least five out of the aforementioned menu of sanctions on a person who sells, supplies, or transfers to or from Iran precious metals and certain other materials—including "graphite, raw or semi-finished metals such as aluminum and steel, coal, and software for integrating industrial processes"—that can "be used in connection with the energy, shipping, or shipbuilding sectors of Iran or any sector of the economy of Iran determined... to be controlled directly or indirectly by Iran's Revolutionary Guard Corps... [be] sold, supplied, or transferred to or from an Iranian person included on the list of specially designated nationals and blocked persons maintained by the Office of Foreign Assets Control of the Department of the Treasury... [or can]



- be used in connection with the nuclear, military, or ballistic missile programs of Iran";
- Authorizes imposition of at least five out of the aforementioned menu of sanctions on a person who knowingly provides insurance or reinsurance or underwriting services for any sanctioned activity regarding Iran or for any person who is sanctioned or is engaged in sanctioned activities;
- Requires the president to ban the opening, and ban or strictly condition the maintenance, in the U.S. of a payable-through or correspondent account by a foreign bank that knowingly facilitated a significant transaction for any Iranian person on the Treasury Department's Specially Designated Nationals and blocked-persons list;
- Requires the president to sanction Islamic Republic of Iran Broadcasting and its president; and
- Requires the president to sanction persons found to be engaged in "the diversion of goods, including agricultural commodities, food, medicine, and medical devices, intended for the people of Iran, or the misappropriation of proceeds from the sale or resale of such goods."
- 9 October 2012: Executive Order 13628 (presently in force) is issued. The measure requires the Secretary of State or the Secretary of the Treasury, as appropriate, to impose the following sanctions on a person who has already been sanctioned pursuant to the Iran Sanctions Act (ISA); the Comprehensive Iran Sanctions, Accountability, and Divestment Act (CISADA); or the Iran Threat Reduction and Syria Human Rights Act (ITRSHRA):
 - Bar U.S. financial institutions from making loans or providing credits to persons sanctioned under section 6(a)(3) of ISA;
 - Ban any foreign-exchange transactions subject to U.S. jurisdiction in which a person sanctioned under section 6(a)(6) of ISA has any interest;
 - Ban any credit transfers or payments between banks or by, through, or to any bank, if such transactions are subject to U.S. jurisdiction and involve any interest of a person sanctioned under section 6(a)(7) of ISA;
 - Seize all property and property interests of persons sanctioned under section 6(a)(8) of ISA;



- Bar any U.S. person from investing in or buying significant amounts of equity or debt instruments of a person sanctioned under section 6(a)(9) of ISA;
- Impose, on principal executive officers sanctioned under section 6(a)(11), the sanctions described in the sanctions described in sections 6(a)(3), 6(a)(6), (6)(a)(7), 6(a)(8), 6(a)(9), or 6(a)(12) of ISA.
- Restrict or ban direct or indirect imports of goods, services, or technology into the U.S. by a person sanctioned under section 6(a)(12) of ISA.

The EO also freezes the property and property interests of any person found by the Secretary of the Treasury:

- To have knowingly transferred or facilitated the transfer of to the Iranian government and related entities, or Iranian nationals, goods or technology likely to be to commit serious human rights abuses against the Iranian people;
- To have knowingly provided to Iran services for the goods or technology above;
- To have provided support to the aforementioned activities or to any persons whose property or property interests are seized due to sanctions for the aforementioned activities; or
- To be owned or controlled by, or acting on or purportedly acting on behalf of, the aforementioned person.

The EO also freezes the property and property interests of any person found by the Secretary of the Treasury:

- To have engaged in censorship or activities banning, limiting, or penalizing Iranians' freedom of expression or assembly or limiting their access to media;
- To have provided support to the aforementioned activities or to any persons whose property or property interests are seized due to sanctions for the aforementioned activities;
- 10 August 2012: The <u>Iran Threat Reduction and Syria</u>
 <u>Human Rights Act</u> (ITRSHRA) (presently in force) is enacted.
 Among other provisions, the legislation:
 - Amends the <u>Iran Sanctions Act</u> (ISA) to require the president to impose at least five out of a menu of sanctions (up from three) for ISA violations regarding development of Iranian petroleum resources; exportation of refined petroleum products to Iran and



- production of them; and development of weapons of mass destruction (WMD);
- Requires the President to impose at least five out of a menu of sanctions on persons who knowingly involve themselves in joint petroleum-development ventures outside of Iran in which "the Government of Iran is a substantial partner or investor" or "Iran could, through a direct operational role in the joint venture or by other means, receive technological knowledge or equipment not previously available to Iran that could directly and significantly contribute to the enhancement of Iran's ability to develop petroleum resources in Iran";
- Requires the President to impose at least five out of a menu of sanctions on persons who knowingly "sells, leases, or provides to Iran goods, services, technology, or support that could directly and significantly contribute to the maintenance or enhancement of Iran's (i) ability to develop petroleum resources located in Iran; or (ii) domestic production of refined petroleum products, including any direct and significant assistance with respect to the construction, modernization, or repair of petroleum refineries or directly associated infrastructure, including construction of port facilities, railways, and roads" whose the primary use is "to support the delivery of refined petroleum products."
- Requires the President to impose at least five out of a menu of sanctions on a person who "is a controlling beneficial owner of, or otherwise owns, operates, or controls, or insures, a vessel that, on or after the date that is 90 days after the date of the enactment of the <u>Iran Threat Reduction and Syria Human Rights</u> <u>Act</u> of 2012, was used to transport crude oil from Iran to another country";
- Requires the President to impose at least five out of a menu of sanctions on a person involved in "concealing Iranian origin of crude oil and refined petroleum products";
- Requires the President to impose at least five out of a menu of sanctions on a person involved in "facilitat[ing] the transshipment of, any goods, services, technology, or other items to any other person" and



"knew or should have known" that such activities (1) "would likely result" in someone else providing the goods, services, technology, or other items to Iran, and (2) "would contribute materially" to Iran's ability to get WMD or related technologies or "acquire or develop destabilizing numbers and types of advanced conventional weapons";

- Requires the President to impose at least five out of a menu of sanctions on a person involved in "joint ventures relating to the mining, production, or transportation of uranium," through which "uranium is transferred directly to Iran or indirectly to Iran through a third country; the Government of Iran receives significant revenue; or Iran could... receive technological knowledge or equipment not previously available to Iran that could contribute materially to [its ability]... to develop nuclear weapons or related technologies";
- Expands the menu of sanctions under ISA to include banning a U.S. person from "investing in or purchasing significant amounts of equity or debt instruments of a sanctioned person," exclusion from the U.S. of corporate officers, principals, principal executive officers, or shareholders with controlling interests in a sanctioned person";
- Authorizes the President to freeze the property and block property transactions of personals involved in providing "vessels or shipping services to transport certain goods related to proliferation or terrorism activities to Iran";
- Requires the President to impose at least five out of a menu of sanctions on a person involved in providing underwriting services, insurance, or reinsurance to the National Iranian Oil Company (NIOC) or National Iranian Tanker Company (NITC);
- Requires the President to impose at least five out of a menu of sanctions on a person involved in purchasing, subscribing to, facilitating the issuance of Iranian sovereign debt;
- Holds U.S. parent companies liable for Iran sanctions violations by their foreign subsidiaries;



- Requiring firms obligated to file regular reports with the Securities and Exchange Commission to disclose involvement in sanctionable activities regarding Iran;
- Excluding from the U.S. senior Iranian government officials—and their family members—involved in WMD activities, support for terrorism, or human rights abuses:
- Freezing the property of and blocking transactions by IRGC officials, agents, or affiliates;
- Requires the President to impose at least five out of a menu of sanctions on a person involved in supporting or engaging certain transactions with the IRGC or other sanctioned persons; and
- Expanding sanctions on Iranian officials involved in human rights abuses.
- 30 July 2012: <u>Executive Order 13622</u> (presently in force) is issued, authorizing several new sanctions, including:
 - Sanctions on foreign banks that knowingly conducted or facilitated significant transactions with the National Iranian Oil Company (NIOC) or Naftiran Intertade Company (NICO);
 - Sanctions on foreign banks that knowingly conducted or facilitated significant transactions to buy or acquire petroleum, petroleum products, petrochemical products from Iran;
 - Freezing the property and interests therein of any person found to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of NIOC, NICO, or the Central Bank of Iran (CBI), or the purchase or acquisition of U.S. bank notes or precious metals by the Iranian government;
 - Sanctions on individuals or entities found to knowingly engage in significant transactions to buy or acquire petroleum, petroleum products, or petrochemical products from Iran.
 - Freezing the property of entities found to have assisted or provided goods or services to NIOC, NICO, or CBI;
 - Freezing the property of entities found to have helped the government of Iran to buy U.S. bank notes, jewels, precious metals, or precious stones.
- 22 April 2012: Executive Order 13606 (presently in force) is issued, blocking the property and suspending the entry into



- the United States of certain persons with respect to grave human rights abuses by the government of Iran and Syria via information technology.
- 5 February 2012: Executive Order 13599 (presently in force) is issued, mandating that U.S. banks freeze U.S.-based assets of entities "owned or controlled by the Iranian government."
 Those entities include the Central Bank of Iran. Previously, U.S. banks had been required to reject transactions with these entities but to return the funds to Iran. This order implements section 1245 of the National Defense Authorization Act for fiscal year 2012.
- 21 November 2011: Executive Order 13590 (presently in force) is issued, authorizing imposition of certain sanctions on persons engaged in "selling, leasing, or providing to Iran goods, services, technology, or support that... could directly and significantly contribute to the maintenance or enhancement of Iran's ability to develop petroleum resources located in Iran" or "the maintenance or expansion of Iran's domestic production of petrochemical products." The available sanctions include:
 - Denying Export-Import Bank guarantees, insurance, extension of credit, or participation in such an extension for export of any goods or services to the sanctioned person;
 - Denying any specific license or other specific permission or authority required to export or reexport goods or technology to the sanctioned person;
 - Taking "such actions as they deem appropriate" by the Federal Reserve's chairman and the president of the New York Federal Reserve Bank, including denying or terminating designation of the sanctioned person "as a primary dealer in U.S. government (USG) debt instruments";
 - Barring the sanctioned person from serving as a USG agent or a repository for USG funds;
 - Barring agencies from procurement or contracting for procurement from the sanctioned person;
 - Barring U.S. financial institutions from making loans or providing credits above \$10 million in any 12-month period to the sanctioned person;
 - Banning any foreign-exchange transactions under U.S. jurisdiction that involve the sanctioned person;



- Banning any credit transfers or payments involving the sanctioned person that are subject to U.S. jurisdiction;
- Freezing all property or property interests of the sanctioned person; and
- Restricting or banning direct or indirect imports of goods, services, or technology into the U.S. from the sanctioned person.
- 31 December 2011: <u>Sanctions</u> against the Central Bank of Iran are enacted in section 1245 of the <u>National Defense</u> <u>Authorization Act for Fiscal Year 2012</u>. Specifically, "the sanctions target foreign financial institutions that conduct petroleum and non-petroleum transactions with Iran's central bank or other blacklisted Iranian financial entities."
 - "For non-petroleum transactions, from February 29 [2012] the law requires the president to punish private banks that 'knowingly conducted or facilitated any significant financial transaction with the Central Bank of Iran' or other blacklisted entities."
 - "For oil-related transactions, from June 28 [2012] the law allows the president to sanction foreign banks that carry out financial transactions 'for the purchase of petroleum or petroleum products from Iran' provided several conditions are met."
 - The law gives the president an explicit exemption under which he can choose not to apply sanctions if he determines that the country with primary jurisdiction over the bank has 'significantly reduced' its volume of crude oil purchases.
 - "The law provides broad 'waiver' authority under which
 the president may waive sanctions for up to 120 days,
 and every 120 days thereafter, if he determines that it
 'is in the national security interest of the United States.'
 If he does so, he must also submit a report to Congress
 'providing a justification for the waiver' and describing
 any concrete cooperation he has received, or expects
 to receive, as a result of the waiver."
- 23 May 2011: Executive Order 13574 (presently in force) is issued, authorizing the implementation of sections of the <u>Iran</u> <u>Sanctions Act</u> (ISA) by the Secretary of the Treasury, including by:
 - Banning any U.S. bank from loaning money or providing credits to any ISA-sanctioned person;



- Banning any U.S. bank from conducting any foreignexchange transactions involving any ISA-sanctioned person;
- Banning any credit transfers between banks or by, through, or to any bank, in which the U.S. has jurisdiction and which involve any ISA-sanctioned person;
- Freezing all property and property interests of any ISAsanctioned person that come under U.S. jurisdiction;
- Restricting or banning direct or indirect imports of goods, services, or technology into the U.S. from any ISA-sanctioned person.
- 28 September 2010: Executive Order 13553 (presently in force) is issued, "blocking property of certain persons with respect to serious human rights abuses by the government of Iran...." The order targets individuals within the IRGC, intelligence, and police communities. It marked the first time a U.S. president levied sanctions against Iran for human rights abuses.
- 1 July 2010: The Comprehensive Iran Sanctions,
 Accountability, and Divestment Act (CISADA) (presently in force) is enacted, instituting the toughest sanctions ever on Iran. The legislation makes it more difficult for Iran to procure "refined petroleum as well as the goods and services to modernize its oil and natural gas sector, the mainstay of its economy." Among other provisions, the bill:
 - Amends the <u>Iran Sanctions Act</u> (ISA) to direct the President to impose three or more specified ISA sanctions if a person has made an investment of \$20 million total or more in Iran's petroleum industry, or has assisted Iranian oil production;
 - Sanctions sales to Iran of refined petroleum and of services and equipment and services that could help Iran make or import gasoline.
 - Codifies the U.S. trade ban instituted in Executive Order **12959**:
 - Authorizes state and local governments to adopt and enforce measures divesting assets from Iran;
 - Authorizes the President to designate a given country as a "Destination of Diversion Concern" to prevent black-market proliferation networks and U.S.-origin technology from reaching Iranian end-users;



- Reinstates a complete ban on U.S. imports from Iran, including carpets, caviar, pistachios, and fruit products; and
- Requires the Director of National Intelligence to report to the President; the Secretaries of Defense, Commerce, State, Treasury; and Congress to identify countries that permit the diversion through the country of dual-use and banned goods and services to "Iranian end-users or Iranian intermediaries."
- 6 November 2008: The U.S. Treasury Department <u>revokes</u> <u>Iran's "U-turn" license</u>, (revocation presently in force), "further restricting Iran's access to the U.S. financial system."
 - Prior to this action, "U.S. financial institutions were authorized to process certain funds transfers for the direct or indirect benefit of Iranian banks, other persons in Iran or the Government of Iran, provided such payments were initiated offshore by a non-Iranian, non-U.S. financial institution and only passed through the U.S. financial system en route to another offshore, non-Iranian, non-U.S. financial institution. As a result of today's action, U.S. financial institutions are no longer allowed to process these U-turn transfers."
 - "The Treasury Department previously designated Iranian state-owned banks Melli, Mellat, Sepah, Future Bank and the Export Development Bank of Iran for their roles in Iran's weapons proliferation activities, as well as Bank Saderat for providing support to terrorism. While these banks are already prohibited from taking advantage of the U-turn authorization, today's action ends this exception for all remaining Iranian banks, both state-owned and private, including the Central Bank of Iran."
- 30 September 2006: The <u>Iran Freedom Support</u>
 Act (presently in force) is enacted, which, among other provisions:
 - Codifies the prohibition on U.S. investment in Iran instituted by Executive Order <u>12959</u>; and
 - Sanctions firms or persons who sell Iran "chemical, biological, or nuclear weapons or related technologies" or "destabilizing numbers and types" of advanced conventional weapons.
- **28 June 2005:** Executive Order 13382 (presently in force) is issued, blocking the property of specially designated weapons



of mass destruction (WMD) proliferators and members of their support network. This EO "takes additional steps to deal with the national emergency declared in **Executive Order 12938**." Many Iran sanctions designations have been levied under this authority, including **sanctions** against individuals and entities involved in Iran's UAV program.

- 23 September 2001: Executive Order 13224 (presently in force) is issued, blocking the property in the U.S. of all persons determined by the Secretary of the Treasury in consultation with the Secretary of State and the Attorney General to:
 - "Have committed, or to pose a significant risk of committing, acts of terrorism that threaten the security of U.S. nationals or the national security, foreign policy, or economy of the United States";
 - "Be owned or controlled by, or to act for or on behalf of those persons listed in the Annex of [Executive Order 13224]";
 - Be owned or controlled by, or to act for or on behalf of those persons determined to pose a terrorist threat to the U.S. or to assist such acts of terrorism by providing financial, material, or technological support.
- 14 March 2000: The <u>Iran Nonproliferation Act</u> (later renamed the Iran, North Korea, Syria Nonproliferation Act, or INKSNA) (presently in force) is enacted, which, among other provisions:
 - Authorizes "the United States government to impose sanctions on foreign individuals, private entities, and governments that engage in...the transfer to or acquisition from Iran...of equipment and technology controlled under multilateral control lists," such as the Missile Technology Control Regime;
 - "Provides for sanctions for the transfer of equipment or technology having the potential to make a material contribution to the development of weapons of mass destruction or cruise or ballistic missile systems."
- 19 August 1997: Executive Order 13059 (presently in force) is issued, banning American companies from knowingly exporting goods to another country to be incorporated into products whose ultimate destination is Iran.
- **5 August 1996:** The <u>Iran Sanctions Act</u> (ISA) (presently in force) is enacted. It serves as the foundational Iran sanctions law. Iran sanctions legislation enacted afterward has usually included amendments to ISA. The law's focus is sanctioning



foreign companies who invest in, or provide goods or services for, Iran's energy sector.

• **6 May 1995:** Executive Order 12959 (presently in force) is issued, prohibiting U.S. trade with and investment in Iran.



United Nations

Since 2006, the U.N. has passed a series of four sanctions measures against the Iranian regime for its illegal nuclear program.

- 20 July 2015: The U.N. Security Council adopts <u>Resolution</u>
 2231 (presently in force), which endorses the Iran nuclear deal (formally the "Joint Comprehensive Plan of Action," or JCPOA).
 - Pursuant to the deal, Resolution 2231 conditionally terminates the provisions—including sanctions—of Resolutions 1696, 1737, 1747, 1803, and 1929. The provisions of two other Iran-focused Council resolutions, 1835 and 2224, were also conditionally terminated.
 - If one of the JCPOA participants (China, the European Union, France, Germany, the U.K., and the U.S.) notified the Council of a matter that constitutes "significant non-performance of commitments under the JCPOA" by Iran, the Council would have to vote within 30 days on whether to affirmatively continue the termination of the aforementioned provisions. If a resolution continuing that termination did not pass, all the terminated provisions—including sanctions—would be reinstated. This is also called the "snapback sanctions mechanism."
 - However, if the terminated provisions are not reinstated by October 18, 2025 (ten years from the date when the JCPOA came into effect), all of the provisions of Resolution 2231 are terminated and the Council's consideration of the issue of Iran's nuclear program would end. The ability of the P5+1 to snapback sanctions on Iran would also end.
 - The arms embargo under U.N. Security Council Resolution 2231 expired in October 2020 as did the



travel ban on Iranian officials on the 2231 List. Their assets are subject to a freeze until October 2023 and the restrictions on Iran's missile program are also scheduled to lapse in October 2023.

- 9 June 2010: The U.N. Security Council adopts <u>Resolution</u>
 1929 (whose provisions are conditionally terminated at present), its <u>fourth round of sanctions</u> against Iran. The Obama administration <u>notes</u> that the sanctions include "financial curbs, an expanded arms embargo and warnings to UN member states to be vigilant about a range of Iranian activities," as well as the following:
 - "Iran is prohibited from investing in sensitive nuclear activities abroad, like uranium enrichment and reprocessing activities, where it could acquire nuclear technology and know-how, as well as activities involving ballistic missiles capable of delivering nuclear weapons. The ban also applies to investment in uranium mining";
 - "States are prohibited from selling or in any way transferring to Iran eight broad categories of heavy weapons (battle tanks, armored combat vehicles, large caliber artillery systems, combat aircraft, attack helicopters, warships, missiles or missile systems)";
 - "Iran is subject to a new regime for inspection of suspicious cargo to detect and stop Iran's smuggling. States should inspect any vessel on their territory suspected of carrying prohibited cargo";
 - "States must require their nationals to exercise vigilance over IRISL, a known sanctions violator... States are requested to report any information on activities by IRISL and Iran's Air's cargo division to evade sanctions, including by renaming vessels." States are also required to exercise vigilance when doing business with "any Iranian firm," including the IRGC;
 - "States are called upon to prevent any financial service
 -- including insurance or reinsurance -- and freeze any
 asset that could contribute to Iran's proliferation...
 States are called upon to prohibit on their territories
 new banking relationships with Iran, including the
 opening of any new branches of Iranian banks, joint
 ventures and correspondent banking relationships, if
 there is a suspected link to proliferation;" and



- "A UN 'Panel of Experts' will be established to monitor states' implementation of the sanctions, report on sanctions violations and recommend ways to continually improve enforcement."
- 3 March 2008: The U.N. Security Council adopts Resolution 1803 (whose provisions are conditionally terminated at present), its third round of sanctions against Iran to ban the trade of dual-use technology. The measure authorizes inspections of air and sea shipments to Iran that are suspected of containing banned items. Additionally:
 - The sanctions require financial monitoring of Bank Melli and Bank Saderat, both of which have suspected ties to Iranian proliferation; and
 - The sanctions order countries to "freeze the assets of 12 additional companies and 13 individuals with links to Iran's nuclear or ballistic missile programmes – and require countries to 'exercise vigilance' and report the travel or transit of those Iranians. It imposes a travel ban on five individuals linked to Iran's nuclear effort."
- 24 March 2007: The UN Security Council unanimously passes Resolution 1747 (whose provisions are conditionally terminated at present), its second round of sanctions against Iran, placing an embargo on Iranian weapons exports to prevent its support of terrorist organizations. The resolution also prevents nations and international banks from making new loans to Iran. The sanctions primarily target Bank Sepah and the Revolutionary Guard in addition to 15 Iranian citizens and 13 organizations, whose assets were frozen.
- 23 December 2006: After Iran turns down an economic and civilian nuclear technology package offered by the five permanent members of the United Security Council and Germany—and endorsed by the Council in Resolution 1696—the Council unanimously adopts Resolution 1737 (whose provisions are conditionally terminated at present), its first round of sanctions against the Islamic Republic. The resolution bans the supply of nuclear-related technology and materials to Iran. It also freezes the assets of "key" individuals and companies linked to Iran's nuclear program.





European Union

- 7 December 2020: Magnitsky-style <u>Council Decision</u>
 2020/1999 is adopted, establishing a framework for targeted restrictive measures to address serious human rights violations and abuses worldwide. Individuals and entities determined to have engaged in genocide, crimes against humanity, and other human rights violations and abuses specified in the Decision shall be subject to asset freezes. Furthermore, making funds and economic resources available to the designated individuals or entities shall be prohibited.
- **16 January 2016:** Pursuant to the Iran nuclear deal (formally the "Joint Comprehensive Plan of Action," or JCPOA), the European Council **lifts** all nuclear-related economic and financial sanctions on Iran. Specifically, UN Security Council Resolution 2231 **requires** the EU to terminate the provisions of Council Regulation (EU) No 267/2012 and 2010/413/CFSP. Some sanctions remain in place, including "restrictions on the transfer of proliferation sensitive goods, the arms and ballistic missiles embargoes and the restrictive measures against some of the listed persons and entities." Per the JCPOA, the EU will lift the restrictions on **proliferation sensitive goods** by no later than October 18, 2023, and scrap the remaining aforementioned sanctions by no later than October 18, 2025, provided that the U.N. Security Council has not "snapped back" sanctions into effect in the event of Iranian noncompliance with its ICPOA commitments. EU sanctions on Iranian officials and entities for human rights violations will remain in force.
- 17 March 2014: Council Regulation 269/2014 (presently in force) is instituted, freezing all funds belonging to any natural persons or entities associated with those persons identified by the Council as being responsible for "actions which undermine or threaten the territorial integrity, sovereignty, and independence of Ukraine." The EU has levied sanctions against Iran under this authority for its support of Russia's war in Ukraine.
- 23 March 2012: <u>Council Regulation 267/2012</u> (conditionally terminated since) is instituted, amending the January 2012 oil embargo. Under the amendments,
 - The "sale, supply, transfer or export to Iran of certain key equipment or technology which could be used in



- the key sectors of the oil, natural gas, and petrochemical industries" remain prohibited;
- Trade restrictions against "crude oil and petroleum products, petrochemical products, gold, precious metals, and diamonds" also remain in place;
- The targeted sanctions against Iran's Central Bank from January 2012 should not prevent trade operations "including contracts relating to foodstuffs, healthcare, medical equipment or for humanitarian purposes."
- 23 January 2012: The EU approves an <u>oil embargo</u> ("Council Decision 2012/35/CFSP") against Iran and freezes the assets of the Central Bank of Iran within the EU.
 - "Imports of Iranian crude oil and petroleum products" are banned. "The prohibition concerns import, purchase and transport of such products as well as related finance and insurance. Already concluded contracts can still be executed until 1 July 2012."
 - "Imports of petrochemical products from Iran into the EU as well as the export of key equipment and technology for this sector to Iran" are outlawed. "New investment in petrochemical companies in Iran as well as joint ventures with such enterprises are also no more allowed."
 - "The assets of the Iranian central bank within the EU" are frozen, "while ensuring that legitimate trade can continue under strict conditions."
- 23 June 2011: Council Implementing Regulation (EU)
 611/2011 (presently in force) is adopted to implement
 Regulation 442/2011 concerning restrictive measures in view
 of the situation in Syria. The implementing regulation adds to
 442/2011's list of persons, entities, and bodies subject to
 restrictive measures for, among other things:
 - Selling, supplying, transferring, or exporting equipment which might be used for repression in Syria;
 - Providing technical assistance in the use in Syria of goods and technologies listed in the <u>EU's Common</u> <u>Military List</u>.
- 12 April 2011: The European Council adopts new <u>sanctions</u> (presently in force) that freeze assets of and ban travel to the EU by persons and entities "responsible for serious human rights violations in Iran." The Council has renewed the sanctions every year.



- **26 July 2010:** The EU passes new <u>sanctions</u> (conditionally terminated since) that ban investments in, technical assistance to, and technology transfers to Iran's oil and gas industry.
 - The sanctions ("Council Decision 2010/413/CFSP") <u>prohibit</u> the sale of any equipment or technology that can be used in refining, exploration, and the production of liquefied natural gas.
 - All trade supports, including export credit guarantees, are banned; insurance contracts covering a period of two years or longer are prohibited (those under two years are discouraged).
 - Transfers of more than €10,000 must be reported to national authorities, and transfers of more than €40,000 must receive prior authorization.
 - Banking relationships with Iranian financial entities are prohibited, as are the opening of Iranian banks and/or subsidiaries within the EU.
 - Finally, ships in EU ports (and at sea—with the permission of the ship's "flag state") suspected of carrying prohibited material will be inspected.
- 27 December 2001: Common Position 2001/931/CFSP (presently in force) is instituted, authorizing the Council to issue terrorist designations against any person, groups, and entities "on the basis of precise information or materiel in the relevant file which indicates that a decision has been taken by a 'competent authority' (i.e., a judicial authority, or where judicial authorities have no competence, an equivalent competent authority), irrespective of whether it concerns the instigation of investigations or prosecution for a terrorist act, an attempt to perpetrate, participate in or facilitate such an act based on serious and credible evidence." The European Community shall ensure that the funds and other financial assets or economic resources of any person, groups and entities thus implicated in "terrorist acts" as defined in the Common Position and thereby listed in the Annex are frozen.



United Kingdom

• The U.K. has implemented all EU sanctions on Iran. On December 31, 2020, at 11 PM, all exiting EU sanctions will



- be <u>transferred</u> into British law, pursuant to the <u>Sanctions</u> <u>and Anti-Money Laundering Act 2018</u>.
- 31 December 2020: The <u>Counter-Terrorism (International Sanctions)(EU Exit) Regulations 2019</u> (presently in force) comes into force, authorizing the U.K. government to impose asset freezes and travel bans against persons determined to have been involved in a terrorist activity. More specifically, persons involved in terrorism are defined for the purpose of this Regulation as those who are responsible for:
 - "Providing financial services, or making available funds or economic resources, for the purposes of terrorism";
 - "Facilitating, promoting, or encouraging terrorism";
 - "Carrying out recruitment activities for a person who is involved in terrorism";
 - The "sale, supply, or transfer of arms or material related to arms to a person who is involved in terrorism."
- 31 December 2020: The Russia (Sanctions) (EU Exit)
 Regulations 2019 (presently in force) come into force,
 authorizing "financial, trade, transport, and immigration
 sanctions to encourage Russia to cease actions which
 destabilize Ukraine, including actions undermining or
 threatening the territorial integrity, sovereignty, and
 independence of Ukraine." Among other things, the
 Regulations prohibit:
 - Dealing in "funds or economic resources owned, held, or controlled by a designated person";
 - "The export of military goods to, or for use in, Russia";
 - "The import of arms and related materiel which originate in Russia";
 - The supply or delivery of military goods from a third country to Russia;
 - "The export of dual-use goods for military use from a third country to Russia";
 - The export of energy-related goods to Russia;
 - The provision of technical assistance relating to energy-related goods to Russia.

The U.K. has levied <u>sanctions</u> against Iran under this authority for its support of Russia's war in Ukraine.

• 31 December 2020: The <u>Iran Human Rights (Sanctions) (EU Exit) Regulations 2019</u> (presently in force) come into force, authorizing financial, trade, and immigration sanctions <u>aimed</u> at encouraging the government of Iran to comply with



international human rights law and respect human rights. Among other things, the Regulation authorizes asset freezes of persons designated for being or having been involved "in the commission of a serious human rights violation or abuse in Iran." Designated individuals are also banned from entering or remaining in the U.K.

- 31 December 2020: The Iran (Sanctions)(Nuclear)(EU Exit)
 Regulations 2019 (presently in force) come into force, authorizing sanctions aimed at encouraging the Iranian government to comply with relevant UN obligations and abandon nuclear weapons programs. The sanctions are also intended to restrict Iran's ability to develop nuclear weapons and nuclear weapons delivery systems. Among other things, the Regulation authorizes asset freezes targeting persons designated for violating export and import restrictions on certain military, missile, and nuclear-related goods and technologies. Designated persons are also banned from entering or remaining in the U.K.
- 31 December 2020: The <u>Syria (Sanctions) (EU Exit)</u>
 <u>Regulations 2019</u> (presently in force) come into force,
 authorizing asset freezes and travel bans against persons
 designated for violating prohibitions on the export to or
 import from Syria of arms and related material. Furthermore,
 the import of crude oil and petroleum products from Syria is
 prohibited.



Japan

- 2016: Japan <u>lifts</u> sanctions on Iran as the Iran nuclear deal (formally the "Joint Comprehensive Plan of Action," or JCPOA) took effect.
- 3 September 2010: Japan imposes <u>new sanctions</u> that ban transactions with some Iranian banks and target energyrelated investments. The sanctions <u>target</u> Bank Mellat, the Islamic Republic of Iran Shipping Lines, and the Islamic Revolutionary Guard Corps (IRGC).





South Korea

- 2016: South Korea <u>lifts</u> sanctions on Iran as the Iran nuclear deal (formally the "Joint Comprehensive Plan of Action," or JCPOA) took effect.
- **8 September 2010:** South Korea announces <u>sanctions</u> (since terminated) to:
 - "Limit the foreign-exchange transactions of more than 100 people and Iranian entities."
 - "Step up inspections of suspicious cargo to and from Iran; put those blacklisted on a travel ban."
 - "Limit investments in Iran's gas and oil refinery industries."
 - "The sanctions target Bank Mellat, the Revolutionary Guard, and the Islamic Republic of Iran Shipping Lines, among other entities."



Canada

- 18 October 2017: The Justice for Victims of Corrupt Foreign Officials Act (also known as the Sergei Magnitsky Law) (presently in force) is enacted to provide for "restrictive measures in respect to foreign nationals responsible for gross violations of internationally recognized human rights." Among other things, the act authorizes the government of Canada to restrict or prohibit "the dealing by any person in Canada or Canadian outside Canada in any property, wherever situated, of foreign nationals" responsible for, or complicit in, extrajudicial killings, torture, or other gross violations of internationally recognized human rights. Furthermore, the act authorizes the government of Canada to prohibit "any financial transaction related to a dealing" in property of a foreign national responsible for, or complicit in, human rights violations.
- 24 February 2016: Following the adoption of the Iran nuclear deal (formally the "Joint Comprehensive Plan of Action" or JCPOA), the Canadian government makes <u>amendments</u> (presently in force) to Iran sanctions



regulations under the <u>Special Economic Measures</u> <u>Act</u> (SEMA) to:

- "Remove the blanket prohibitions on imports and exports to and from Iran";
- "Remove the prohibition on the transfer, provision or communication of certain technical data to Iran";
- "Remove broad prohibitions on providing or acquiring financial or other services to or from Iran";
- "Remove the prohibition on making investments in entities in Iran";
- "Remove the prohibitions related to the provision of services to vessels owned or operated by Islamic Republic of Iran Shipping Lines, or to Iranian oil takers or cargo vessels"; and
- "Modify the list of items prohibited for export to Iran...
 in order to continue prohibiting the export of
 potentially proliferation sensitive items to Iran by
 individuals in Canada or Canadians abroad, especially
 with respect to nuclear proliferation and ballistic
 missiles."
- **5 February 2016:** Following adoption of the JCPOA, the Canadian government makes <u>amendments</u> (parts of which remain in force) to the Regulations Implementing the United Nations Resolutions on Iran to:
 - Repeal the definitions of United Nations Security Council Resolutions 1747, 1803, and 1929;
 - Amend the definition of "designated person" to mean a person designated by the Council under paragraph 6(c) of Annex B of Resolution 2231 or whose name appeared, on July 20, 2015, on the list established under Resolution 1737, and whose name has not since been removed from that list;
 - Prohibit dealings with a designated person or a person acting on behalf of or at the direction of a designated person;
 - Prohibit the sale, supply or transfer of products listed in Paragraph 2 of Annex B of Resolution 2231, United Nations Register of Conventional Arms, Council document <u>S/2015/546</u> (the Missile Technology Control Regime), and "any technology in respect of any activity related to ballistic missiles capable of delivering nuclear weapons...that is consistent with the JCPOA."



- 29 May 2013: The Canadian government makes <u>amendments</u> (since terminated) to SEMA's Iran sanctions regulations to completely ban imports from and exports to Iran.
- 11 December 2012: The Canadian government makes <u>amendments</u> (some of which remain in force, and some of which have been terminated) to SEMA's Iran sanctions regulations to prohibit Canadian citizens or other persons in Canada from exporting, selling, supplying, or shipping to Iran:
 - "Equipment or machinery designed for the building, maintenance or refitting of ships";
 - "Vessels designed for the transport or storage of oil and petroleum or petrochemical products";
 - "Goods designed for drilling, surveying and mineral exploration, and specialized equipment used in the mining industry";
 - "Goods used to provide broadcasting, telecommunications or satellite services to Iran or to any entity acting on behalf of, or at the direction or order of Iran,"; and
 - "Goods used in the production of metals, and new goods of proliferation concern, as added to Schedule 2 of the Iran Regulations."

The amended regulations also prohibit Canadian citizens or other persons in Canada from:

- "Providing or acquiring insurance and reinsurance to, from or for the benefit of, or on the direction or order of, Iran or any entity in Iran";
- "Exporting to Iran any hard currency from any country and of any denomination that is greater in value than \$40,000";
- "Importing, purchasing, acquiring or shipping natural gas, oil, petroleum or petrochemical products from Iran"; and
- "Providing marketing services, or any financial or other related services in respect of prohibited goods."
- 7 September 2012: Order Establishing a List of Foreign State Supporters of Terrorism (presently in force) is enacted pursuant to subsection 6.1(2) of the State Immunity Act. The Islamic Republic of Iran is designated as a Foreign State Supporter of Terrorism. In concert with the Justice for Victims of Terrorism Act, this designation authorizes "victims to bring"



- civil action against Iran for losses or damages from an act of terrorism with links to Iran committed anywhere in the world."
- 21 November 2011: The Canadian government makes <u>amendments</u> (since terminated) to SEMA's Iran sanctions regulations to:
 - Prohibit most financial transactions with Iran;
 - Expand the list of prohibited goods to include all used in Iran's energy sector; and
 - Amend the list to include further items that could be utilized for Iran's nuclear program.
- 22 July 2010: The Canadian government makes <u>amendments</u> (some of which remain in force, and some of which have been terminated) to SEMA's Iran sanctions regulations to prohibit:
 - Dealing in the property of designated persons;
 - Exporting or otherwise providing to Iran arms and related material not already banned, items used in refining oil and gas and items that could contribute to Iran's proliferation activities;
 - Providing or acquiring financial services to allow an Iranian financial institution (or a branch, subsidiary or office) to be established in Canada, or vice versa;
 - Making any new investment in the Iranian oil and gas sector:
 - Establishing correspondent banking relationships with Iranian financial institutions, or purchasing any debt from the government of Iran;
 - And providing a vessel owned or controlled by, or operating on behalf of the Islamic Republic of Iran Shipping Lines (IRISL) with services for the vessel's operation or maintenance.
- 22 February 2007: The Regulations Implementing the
 United Nations Resolutions on Iran (parts of which remain
 in force) is enacted, prohibiting Canadians from dealing in
 property owned or controlled by a person designated as of
 December 23, 2006 (when the U.N. Security Council passes
 Resolution 1737), and selling, supplying or transferring certain
 material or equipment applicable to Iran's nuclear program,
 including, but not limited to:
 - Products that appear in section 2 to 7 of Annex B of Information Circular <u>INFCIRC/254/Rev.8/Part 1</u>, such as non-nuclear materials, and other equipment and technology used in nuclear reactors;



- Products that appear in section 1 of Annex A of that Information Circular, titled "Source and Special Fissionable Material";
- Products that appear in section 1 of Annex B of that Information Circular, titled "Nuclear Reactors...or equipment and components therefor";
- And all dual-use products listed in Information Circular INFCIRC/254/Rev.7/Part 1.
- 1 November 2001: The Immigration and Refugee
 Protection Act (presently in force) is enacted, authorizing the
 government of Canada to prohibit foreign persons engaged in
 terrorism or gross human rights violations, among other
 things, from entering Canada. Canada has banned senior
 members of the Iranian regime and many members of the
 IRGC from entering Canada under this authority.
- 1985: The <u>State Immunity Act</u> (presently in force) is enacted. The act states that "where a court of competent jurisdiction has determined that a foreign state...has supported terrorism, that state is also not immune from the jurisdiction of a court in proceedings against it that relate to terrorist activity by the state."



Australia

- 8 December 2021: The Magnitsky-style <u>Autonomous</u> <u>Sanctions Amendment Act 2021</u> becomes law, allowing the minister of foreign affairs to impose targeted financial sanctions and travel bans against a person or entity that, regardless of their geographical location, has:
 - Engaged in "serious violations or abuses of...rights to life; not to be subjected to torture or cruel, inhuman or degrading treatment or punishment; and to be free from slavery, servitude or forced or compulsory labor";
 - Engaged in "serious corruption, defined as bribery or misappropriation of property";
 - Caused a "cyber incident or an attempted cyber incident that is significant or which, had it occurred, would have been significant."
- 1 March 2016: Following the adoption of the Iran nuclear deal (formally the "Joint Comprehensive Plan of Action" or JCPOA),



the Australian government <u>amends</u> (presently in force) its sanctions laws, including by permitting businesses to engage in transactions of more than 20,000 Australian dollars involving entities from Iran without seeking preapproval. Sanctions remain in force regarding limits on the transfer of proliferation-sensitive goods and the embargo on arms and ballistic missiles transfers.

15 June 2010: Australia enacts <u>sanctions</u> (parts of which remain in force) against Bank Mellat, the Islamic Republic of Iran Shipping Line, and General Rostam Qasemi, the commander of Khatem ol-Anbiya Construction Organisation. In addition, the sanctions target an additional 98 entities and 12 individuals not listed under UNSCR 1929. They include a trade ban on all arms and dual-use technology.



Israel

- 26 June 2011: Israel <u>announces</u> economic sanctions that:
 - <u>Amend</u> the 'Prohibition on Money Laundering Law' to enable the expansion of oversight and control on entities trading with Iran;
 - Restrict contact between the State and companies that trade with Iran;
 - <u>Allow</u> for the confiscation of profits from "enemy trading"; and
 - <u>Declare</u> Iran and "bodies linked to it" as enemy elements.