

European political and business leaders participating in the 3rd Banking and Business Forum Iran Europe on November 16-17, 2016 in Frankfurt, Germany, must not lose sight of the profound moral and business risks associated with engaging with the world's leading state-sponsor of terrorism.

Until Tehran changes its behavior, Europe should not reward the Ayatollah's regime with investment and stronger economic ties.

European political leaders and companies should also be mindful of the shifting political winds in the United States—legal and regulatory uncertainty loom large.

### REVOCATION OF JCPOA RISK

Iran may violate the agreement or the incoming Trump administration may pursue a different Iran policy, resulting in the abandonment of the nuclear deal and the return of sanctions ("Snap-Back" Sanctions)

# IRGC FRONT COMPANY RISK

Firms that go into Iran will likely do business with Islamic Revolutionary Guards Corps (IRGC) front companies

### KIDNAP & ARREST RISK

Firms cannot guarantee that their employees—especially dual-nationals—will not be subject to arbitrary arrest and detention

Siamaki Namazi, an Iranian-American businessman, was recently sentenced to 10 years in prison in Tehran on unsubstantiated charges of espionage

### "BLOOD ON HANDS"/TERROR RISKS

Firms run the high risk of inadvertently providing tools to Iran's human rights abusers Iran also remains the leading state sponsor of terror, supporting Hezbollah, Hamas, and Houthi rebels

### SANCTIONS & MONEY LAUNDERING RISK

Companies that go into Iran will still be subject to extraterritorial secondary U.S. sanctions (\$14 billion in fines since 2009 for violating U.S. sanctions on Iran)

Iran remains designated as a jurisdiction of primary money laundering concern under Section 311 of U.S.A. PATRIOT Act

### **VIOLATIONS OF INT'L LAWS & TREATIES RISK**

Iran continues to violate international law and U.N. Security Council resolutions enshrining the nuclear deal, including the testing of a ballistic missile capable of reaching Israel

### HACKING & CYBERSECURITY RISK

Businesses face the threat of hacking by Iranian operatives including the disclosure of proprietary information and confidential employee and corporate information, personal information (friends and family), and client information

### REPUTATIONAL RISK

Business in Iran poses myriad reputational risks due to the regime's egregious record of human rights violations and international sponsorship of terrorism

### INSURANCE RISK

Due to compounded risks associated with Iran, business is risky both for companies and their insurance providers, who cannot guarantee normal and successful operations in Iran

## COUNTRY & CORRUPTION RISK

Iran still rates highly in terms of political risk, exchange rate risk, sovereign risk, and transfer risk due to its sponsorship of terror groups, human rights violations, and blatant disregard for international law

The **RISKS** of doing business with the Ayatollah are simply **TOO HIGH**.

