UN Sanctions on Iran

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Effective implementation of UN Sanctions on Iran

• Domestic Coordination

• International Cooperation

• Reporting Requirements

• Working with the private sector
Provisions of UN Sanctions

• Commercial activities covered by sanctions:
  • Manufacturing and Export
  • Banking and Finance
  • Shipping and Transport
  • Technical teaching and training
• Global reach of Iran’s circumvention attempts put companies at risk
• Relevant companies include: manufacturers, freight forwarders, shipping lines, express freight services, banks, insurance companies, lawyers, etc
What companies may need

• Clear legislation and regulation
  – Export Licensing requirements
  – ICPs
• Speedy response to queries
  – Technical advice
• Scope for consultation
• Support over financial transactions
What companies should do

• Obey the rules
• Implement Internal Compliance Procedures
  – Identify and handle high-risk transactions
  – Front companies
  – Internal databases
  – Policies for subsidiaries and distributors overseas
  – Encourage good practices with commercial partners
• Share relevant information with government
  ➢ Outreach to private sector companies is vital for effective implementation of sanctions
Some indicators of possibly suspicious enquiries

- Reluctance by the customer to share information on end-use and end-user
- Inconsistency between enquiries and the customer’s business activities
- Inconsistency between the technical properties of the items of interest and the technical capability of their country of destination
- Potential purchasers with little or no relevant business background
- Offers of abnormally favourable terms of payment
Some indicators of possibly suspicious enquiries (cont.)

- Purchasers’ eagerness to acquire products despite unfamiliarity with the products’ properties
- Purchasers’ refusal to accept standard post-sales services, such as installation, maintenance or training
- Enquiries which lack specific dates by when delivery is necessary
- Trading or transportation companies named as consignees
- Unusual transportation routes for export, or unusually remote destination
- Use of postal address by purchaser
Thank You

• For information on UN Sanctions on Iran see:

• To contact UN Panel on Iran:
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Enhancing effectiveness of UN resolutions

• Implementation of all measures by all Member States

• Reporting by Member States to UN, as required or requested under the resolutions, about
  – Implementation of resolutions;
  – Inspections of shipments
  – Incidents of non-compliance