

Overview of current sanctions measures concerning Iran

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1. United States (US) sanctions concerning Iran

ARMS EMBARGO

Policy of denial for defense articles and defense services to Iran.

FINANCIAL RESTRICTIONS

- With limited exceptions, “US Persons” and their owned or controlled non-US entities (together “ITSR Parties”) are generally prohibited from engaging directly or indirectly in virtually all transactions involving Iran, the Government of Iran (including entities owned or controlled by or acting for the Government of Iran), Iranian financial institutions, and any Iranian Specially Designated National (“SDN,” including any entity 50% or more owned by one or more SDNs).
- 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States person, including any foreign branch, of listed persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in.
- All property and interests in property of the Government of Iran, including the Central Bank of Iran, 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of any United States person, including any foreign branch, are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in.
- All property and interests in property of any Iranian financial institution, including the Central Bank of Iran, 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of any United States person, including any foreign branch, are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in.

- Any dealing in any security (or evidence thereof) held within the possession or control of a U.S. person and either registered or inscribed in the name of, or known to be held for the benefit of, or issued by, the Government of Iran, an Iranian financial institution, or any other person whose property and interests in property are blocked pursuant to this section is prohibited.
- An entity that is owned or controlled by a United States person and established or maintained outside the United States is prohibited from knowingly engaging in any transaction, directly or indirectly, with the Government of Iran or any person subject to the jurisdiction of the Government of Iran that would be prohibited pursuant to this part if engaged in by a United States person or in the United States.
- No property subject to the jurisdiction of the United States or which is in the possession of or control of persons subject to the jurisdiction of the United States in which on or after the effective date Iran has any interest of any nature whatsoever may be transferred, paid, exported, withdrawn or otherwise dealt in except as authorized.
- The acquisition, transfer (including the transfer on the books of any issuer or agent thereof), disposition, transportation, importation, exportation, or withdrawal of, or the endorsement or guaranty of signatures on or otherwise dealing in any security (or evidence thereof) registered or inscribed in the name of any Iranian entity is prohibited.
- No United States person, wherever located, may engage in any transaction or dealing in or related to goods or services of Iranian origin or owned or controlled by the Government of Iran; or goods, technology, or services for exportation, reexportation, sale or supply, directly or indirectly, to Iran or the Government of Iran.
- No United States person, wherever located, may approve, finance, facilitate, or guarantee any transaction by a foreign person where the transaction by that foreign person would be prohibited by this part if performed by a United States person or within the United States.
- Any new investment by a United States person in Iran or in property (including entities) owned or controlled by the Government of Iran is prohibited.
- No United States person, wherever located, may perform:
 - A contract that includes overall supervision and management responsibility for the development of petroleum resources located in Iran, or
 - A guaranty of another person's performance under such contract; or
 - A contract for the financing of the development of petroleum resources located in Iran, or
 - A guaranty of another person's performance under such a contract.
- Prohibition for a U.S. financial institution from opening or maintaining a correspondent account or a payable-through account in the United States for a listed foreign financial institution.
- Any person that is owned or controlled by a U.S. financial institution is prohibited from knowingly engaging in any transaction with or benefitting Iran's Islamic Revolutionary Guard Corps or any of its agents or affiliates whose property and interests in property are blocked.
- Prohibition of any significant financial transaction conducted or facilitated by a foreign financial institution on or after June 28, 2012, for the purchase of petroleum or petroleum products from

Iran only if the President determines, that there is a sufficient supply of petroleum and petroleum products from countries other than Iran to permit a significant reduction in petroleum and petroleum products purchased from Iran by or through foreign financial institutions.

- Sanctionable activities by foreign financial institutions:
- Engaging in any significant financial transaction:
- Facilitating the efforts of the Government of Iran (including efforts of Iran's Islamic Revolutionary Guard Corps or any of its agents or affiliates to acquire or develop weapons of mass destruction or delivery systems for weapons of mass destruction; or to provide support for organizations designated as foreign terrorist organizations.
- With the National Iranian Oil Company ("NIOC"), the Naftiran Intertrade Company ("NICO"), or any entity owned or controlled by, or operating for or on behalf of, NIOC or NICO,
- 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;
- For the purchase, acquisition, sale, transport, or marketing of iron, iron products, aluminum, aluminum products, steel, steel products, copper, or copper products from Iran; or
- For or on behalf of any person whose property and interests in property are blocked

EXPORT RESTRICTIONS

- The exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a United States person, wherever located, of any goods, technology, or services to Iran or the Government of Iran is prohibited, including the exportation, reexportation, sale, or supply of any goods, technology, or services to a person in a third country undertaken with knowledge or reason to know that: such goods, technology, or services are intended specifically for supply, transshipment, or reexportation, directly or indirectly, to Iran or the Government of Iran; or such goods, technology, or services are intended specifically for use in the production of, for commingling with, or for incorporation into goods, technology, or services to be directly or indirectly supplied, transshipped, or reexported exclusively or predominantly to Iran or the Government of Iran.
- The reexportation from a third country, directly or indirectly, by a person other than a United States person, of any goods, technology, or services that have been exported from the United States is prohibited if undertaken with knowledge or reason to know that the reexportation is intended specifically for Iran or the Government of Iran; and the exportation of such goods, technology, or services from the United States to Iran was subject to export license application requirements.

TRAVEL BAN

The unrestricted immigrant and nonimmigrant entry into the United States of listed aliens would be detrimental to the interests of the United States, and the entry of such persons into the United States, as immigrants or nonimmigrants is therefore hereby suspended.

IMPORT RESTRICTIONS

The importation into the United States of any goods or services of Iranian origin or owned or controlled by the Government of Iran, other than information and informational materials, is prohibited.

EXPORT CONTROLS

Iran is subject to a US comprehensive export/reexport ban under the Export Administration Regulations, 15 C.F.R. Part 730 et seq. ("EAR"), with respect to items (i.e., goods, software, technology) "subject to the EAR." With regard to Iran, an item is "subject to the EAR" if it is (i) of US-origin (i.e., manufactured or created in the United States), (ii) exported from the United States, (iii) a non-US-made item that incorporates more than de minimis US content (which is 10% or more controlled (i.e., non-EAR99) US content by value for Iran), or (iv) certain foreign direct products of US technology controlled for national security reasons.

Source: <https://ofac.treasury.gov/sanctions-programs-and-country-information/iran-sanctions> & <https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M/part-126/section-126.1>

2. European Union (EU) sanctions concerning Iran

ARMS EMBARGO

Prohibition on the direct or indirect supply, sale or transfer of arms and related materiel of all types, including weapons and ammunition, military vehicles and equipment, paramilitary equipment and spare parts for such arms and related materiel, including software, to, or for the use in, or benefit of, Iran, by nationals of Member States, or through the territories of Member States, or using their flag vessels or aircraft, including technical assistance or training, investment, or brokering services, provide financing or financial assistance, or participate, knowingly or intentionally, in activities the object or effect of which is to circumvent the prohibition.

TRAVEL BAN

Member States shall take the necessary measures to prevent the entry into, or transit through, their territories of persons listed.

ASSETS FREEZE

- All funds and economic resources belonging to, owned, held or controlled by listed persons, entities or bodies shall be frozen.
- No funds or economic resources shall be made available, directly or indirectly, to or for the benefit of listed persons, entities or bodies.

EXPORT RESTRICTIONS

Prohibition to sell, supply, transfer or export, directly or indirectly, goods and technology which might contribute to Iran's capability to manufacture

Unmanned Aerial Vehicles (UAVs) to any natural or legal person, entity or body in Iran or for use in Iran, including technical assistance, brokering services, financing or financial assistance, and other related services, as well as to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to those goods and technology and to the provision, manufacture, maintenance and use of those goods and technology, directly or indirectly to any natural or legal person, entity or body in Iran or for use in Iran.

TRADE RESTRICTIONS

- The direct or indirect supply, sale or transfer to, or for use in, or the benefit of, Iran, by nationals of Member States or through the territories of Member States, or using vessels or aircraft under their jurisdiction, of the following items, materials, equipment, goods and technology, whether or not originating in their territories, shall be subject to approval on a case-by-case basis by the Security Council: (a) all items, materials, equipment, goods and technology contained in the Nuclear Suppliers Group list; (b) any further item if the Member State determines that it could contribute to reprocessing- or enrichment-related or heavy water-related activities inconsistent with the JCPOA.
- The direct or indirect supply, sale or transfer to, or for use in, or the benefit of, Iran, by nationals of Member States or through the territories of Member States, or using vessels or aircraft under their jurisdiction, of items, materials, equipment, goods and technology that could contribute to reprocessing- or enrichment-related, heavy water-related or other activities inconsistent with the JCPOA shall be subject to an authorisation on a case-by-case basis by the competent authorities of the exporting Member State, whether or not originating in their territories.
- Prohibition on the direct or indirect supply, sale or transfer to, or for use in, or the benefit of, Iran, by nationals of Member States, or through the territories of Member States, or using vessels or aircraft under their jurisdiction, of items, materials, equipment, goods and technology contained in the Missile Technology Control Regime list or any additional item that could contribute to the development of nuclear weapon delivery systems, whether or not originating in their territories, including technical assistance or training, investment or brokering services, provide financing or financial assistance, participate, knowingly or intentionally, in activities the object or effect of which is to circumvent the prohibition, and make an investment in the territories under the jurisdiction of Member States by Iran, its nationals, or entities incorporated in Iran or subject to its jurisdiction, or by persons or entities acting on their behalf or at their direction, or by entities owned or controlled by them in any commercial activity involving technologies, as well as the procurement by nationals of Member States, or using their flagged vessels or aircraft, of these items, materials, equipment, goods and technology from Iran.

- The supply, sale or transfer to Iran, by nationals of Member States, or from the territories of Member States, or using vessels or aircraft under their jurisdiction, of graphite, and raw or semi-finished metals, such as aluminium and steel, shall be subject to an authorisation by the competent authority of the exporting Member State whether or not originating in their territories, including technical assistance, training, financing or financial assistance, and other related services.
- The supply, sale or transfer to Iran, by nationals of Member States, or from the territories of Member States, or using vessels or aircraft under their jurisdiction, of software for integrating industrial processes shall be subject to an authorisation by the competent authority of the exporting Member State, whether or not originating in their territories, including technical assistance, training, financing or financial assistance, and other related services.

OTHER RESTRICTIONS OR REQUIREMENTS

- Member States shall inspect, in accordance with their national authorities and legislation and consistent with international law, in particular the law of the sea and relevant international civil aviation agreements, all cargo to and from Iran in their territories, including seaports and airports, if they have information that provides reasonable grounds to believe that the cargo contains items the supply, sale, transfer or export of which is being undertaken contrary to this Decision.
- Member States, consistent with international law, in particular the law of the sea, may request inspections of vessels on the high seas with the consent of the flag State, if they have information that provides reasonable grounds to believe that the vessels carry items the supply, sale, transfer or export of which is being undertaken contrary to this Decision.
- Prohibition on the provision by nationals of Member States, or from the territories of Member States, of engineering and maintenance services to Iranian cargo aircraft if they have information that provides reasonable grounds to believe that the cargo aircraft carry items the supply, sale, transfer or export of which is being undertaken contrary to the restrictions unless the provision of such services is necessary for humanitarian and safety purposes or until the cargo has been inspected, and seized and disposed of if necessary.
- Prohibition on the sale, supply, transfer or export of equipment or software intended primarily for use in the monitoring or interception by the Iranian regime, or on its behalf, of the Internet and of telephone communications on mobile or fixed networks in Iran and the provision of assistance to install, operate or update such equipment or software.
- Prohibition on the sale, supply, transfer or export of equipment which might be used for internal repression to Iran by nationals of Member States or from the territories of Member States or using their flag vessels or aircraft, shall be prohibited, whether or not originating in their territories, including technical assistance, brokering services, financing or financial assistance, and other related services.

CIRCUMVENTION & FACILITATION

Prohibition to participate, knowingly and intentionally, in activities the object or effect of which is to circumvent the measures.

CLAIMS

Prohibition to satisfy certain claims made by certain persons, entities or bodies.

SOURCE: <https://www.sanctionsmap.eu/#/main/details/17,18,56/?search=%7B%22value%22:%22%22,%22searchType%22:%7B%7D%7D>

3. United Kingdom (UK) sanctions concerning Iran

The Iran (Sanctions) (Nuclear) (EU Exit) Regulations 2019 and the Iran (Sanctions) Regulations 2023 put in place sanctions measures.

PROHIBITIONS ON FINANCE

- Asset freeze in relation to designated persons
- Prohibition to make funds available to, or for the benefit of, designated persons
- Prohibition to make economic resources available to, or for the benefit of, designated persons
- Prohibition to make Financial Messaging Services available to designated persons
- Prohibition on circumventing

DIRECTOR DISQUALIFICATION SANCTIONS

PROHIBITIONS ON IMMIGRATION

- Refusal of leave to enter and/or remain in the United Kingdom
- Cancelling a persons leave to enter or remain in the United Kingdom

PROHIBITIONS ON TRADE

Definitions

- Export restricted goods and restricted technology - military goods and technology, missile-list goods and technology, nuclear-list goods and technology, graphite and relevant metals, other restricted goods and technology, relevant enterprise resource planning software, internal repression goods and technology, interception and monitoring goods and technology, interception and monitoring services
- Import designated goods and designated technology - arms and related materiel, missile-list goods, nuclear-list goods, other restricted goods

- Prohibition on export (or for use in), supply, delivery, making available, transfer, technical assistance, financial services, brokering services in relation to export restricted goods and restricted technology
- Prohibition on export (or for use in), supply, delivery, making available, transfer, technical assistance, financial services, brokering services in relation to export unmanned aerial vehicle goods
- Prohibition on import, supply and delivery, acquisition, transfer in relation to import designated goods and designated technology
- Prohibition on the provision of interception and monitoring services
- Prohibition on arrangements relating to uranium mining and certain restricted goods and technology
- Prohibition on services in relation to certain ships and aircraft
- Prohibition on circumventing

PROHIBITIONS IN RELATION TO SHIPS

- Prohibition on port entry
- Prohibition on registration in the United Kingdom

SOURCE: <https://www.gov.uk/government/publications/financial-sanctions-iran> & <https://www.gov.uk/government/publications/financial-sanctions-iran-nuclear-proliferation>

4. Canada sanctions concerning Iran

Sanctions related to Iran were enacted under the United Nations Act and the Special Economic Measures Act in response to Iran's nuclear and weapons of mass destruction (WMD) programs, as well as gross and systematic human rights violations that have been committed in Iran. Subject to certain exceptions, the measures imposed against Iran include:

FINANCIAL RESTRICTIONS

Asset freeze against individuals and entities who were listed by the Security Council or the Committee established pursuant to Resolution 1737 (2006) as of July 20, 2015 whose names were not removed by Resolution 2231, or any other persons who may be listed by the Security Council under Resolution 2231; and

- Prohibition against claims by Iran or designated persons in relation to any transactions prevented by reason of the sanctions imposed against Iran.

- Prohibition on the provision to any person in Iran of technical assistance, financial or related services related to the supply, sale, transfer, manufacture or use of the products subject to the export prohibitions;
- Prohibition on making available to any person in Iran any property, financial assistance or investment, related to the supply, sale, transfer, manufacture or use of the products subject to the export prohibitions.
- Prohibition on making property or financial services available to Iran for the purpose of investing in specified nuclear-related activities in Canada.
- Prohibition on transactions involving property with the listed individuals and entities subject to asset freezes.

EXPORT RESTRICTIONS

Prohibitions on the export to Iran of:

- items, materials, equipment, goods and technology related to uranium enrichment, reprocessing or heavy water-related activities, or to the development of nuclear weapon delivery systems (products listed in the International Atomic Energy Agency's Information Circulars INFCIRC/254/Rev.12/Part 1 and INFCIRC/254/Rev.9/Part 2 and UN Security Council document S/2015/254, as well as to a number of goods listed in Group 1 (Dual-Use List) and Group 2 (Munitions List) in A Guide to Canada's Export Controls;
- items, material, equipment, goods and technology related to goods listed in the Missile Technology Control Regime;
- battle tanks, armored combat vehicles, large caliber artillery systems, combat aircrafts, attack helicopters, warships, missiles or missile systems as defined in the United Nations Registry of Conventional Weapons.
- Prohibition on providing any technology to Iran in respect of any activity related to ballistic missiles capable of delivering nuclear weapons;
- Prohibition on the export, sale, supply or shipment of any listed goods, to Iran, to any person in Iran, or to a person for the purpose of a business carried on in or operated from Iran; and
- Prohibition on transferring, providing or disclosing to Iran or any person in Iran any technical data related to the listed goods.
- Restrictions on the export to Iran of a wide range of sensitive products listed on the Export Control List (ECL), under the Export and Import Permits Act (EIPA).

IMPORT RESTRICTIONS

Prohibition on the acquisition and import from Iran of arms and related material;

TRAVEL BAN

Travel ban against persons listed by the UN Security Council, which are implemented in Canada via the Immigration and Refugee Protection Act.

SOURCE:

https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/iran.aspx?lang=eng